US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
04/18/2022

OPDIV:
ACF

Name:

ACF Collaboration Portal

PIA Unique Identifier:
P-8052731-107215

The subject of this PIA is which of the following?
Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.
Operations and Maintenance

Is this a FISMA-Reportable system?
Yes

Does the system include a Website or online application available to and for the use of the general public?
No

Identify the operator.
Agency

Is this a new or existing system?
Existing

Does the system have Security Authorization (SA)?
Yes

Indicate the following reason(s) for updating this PIA.
ACF Collaboration is an existing Major application, not a GSS, undergoing "first time" initial PIA processing. There is no prior PIA for the system. The system received a six months ATO in 2020, (10/27/20 – 4/26/21). The re-ATO is under way.

Describe in further detail any changes to the system that have occurred since the last PIA.
While ACF Collaboration is an existing system, this is the first PIA processing for the system. It has no prior PIA.

Describe the purpose of the system.
ACF Collaboration Portal is built on Microsoft SharePoint. ACF Collaboration Portal is an enterprise management and collaboration platform that helps ACF manage archives, documents, reports and other content that is vital to the business process. Administration for Children and Families (ACF) Program Offices use ACF Collaboration Portal to create websites and to store, organize, share, and access information in a secure manner. ACF Collaboration Portal is configured using a web browser and provides most of its capabilities via a web User Interface (UI) and web applications. It can be used to manipulate content and site structure, create and delete sites, enable or disable product

features, and configure basic workflows.

ACF Collaboration Portal is a web-based application used by ACF for data storage, collaboration and for document management. It enables constant communication with staff by providing centralized location to store all information.

ACF leverages ACF Collaboration Portal as a ticketing system to manage service requests such as user support, network issues, user access issues, intra-net et cetera from different program offices within the agency. Program offices within ACF can customize ACF Collaboration Portal based on their needs. For example, ACF Collaboration Portal allows the ACF OCIO service desk to create extensive reports, including a visual display of ticket status, assignment, quantity, priority, and resolution time.

Describe the type of information the system will collect, maintain (store), or share.

Currently, ACF Collaboration Portal primarily stores information contained in various file types including Word documents, Excel Spreadsheets, Visio, PowerPoint Slide Decks, and Adobe PDFs.

The following information will be collected, maintained, or shared on the ACF Collaboration Portal Web servers:

System logs containing information on resource details (memory, disk space), operating system details, and network details; Security logs containing information on login attempts, errors, time stamps, and event types; and Application logs on location and service details. Also, the system maintains name, email address, phone numbers and mailing address.

ACF Collaboration Portal is internal to ACF with no public access. Approved users and administrators of ACF Collaboration Portal use Single Sign-On (SSO), which requires ACF Personal Identity Verification or Smart Card (PIV) and passcode/password. It also requires a Virtual Private Network (VPN) connection, Identity is confirmed using ACF's Active Directory (separate system with a dedicated assessment). Once identity is authenticated, this process gives the user access to necessary network resources without having to login or provide credentials again. There are no system specific authentication credentials housed in the system.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

ACF Collaboration Portal is used as an Intranet. ACF Collaboration Portal is the go-to place for users at ACF to access a variety of information, including announcements and scheduled tasks. Dashboards can be tailored for a program office and roles with different levels of access can be created to make sure everyone from interns to the CIO can get the information they need, based on their role and need to know principle.

ACF Collaboration Portal is used as a Document Collaboration Platform. ACF Collaboration Portal provides a common, shared space to store documents so they're not locked away on a user's local hard drive, thus creating a secure environment for storage. ACF Collaboration Portal also allows coworkers to work simultaneously on a single document, saving previous versions, and tracking updates, and ensuring accuracy of content by avoiding the existence of several redundant versions.

ACF Collaboration Portal sites are made up of lists and libraries. Libraries are like folders that contain documents and other content. Lists are the basic building blocks of ACF Collaboration Portal, and anything created in ACF Collaboration Portal is kept in a list. A list has headings and rows of data, similar to an Excel spreadsheet.

The information collected within ACF Collaboration Portal is used to provide a seamless

collaborative environment to its users. It assists users achieve ACF 's mission by providing a robust document management platform.

Also, the system maintains name, email address, phone numbers and mailing address.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Indicate the categories of individuals about whom PII is collected, maintained or shared.

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

PII stored in this system (name, email address and phone number) is used for communication and collaboration among Agency personnel for work related purposes.

Describe the secondary uses for which the PII will be used.

Not applicable. PII is not collected for any other secondary uses.

Identify legal authorities governing information use and disclosure specific to the system and program.

5 USC 301, Departmental regulations.

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Identify the OMB information collection approval number and expiration date

Not applicable. ACF Collaboration Portal is internal to ACF. Members of the public do not submit information to ACF Collaboration Portal. The public has no access to the ACF Collaboration Portal environment. The PII collected is not subject to the Paper Reduction Act (PRA). Programs do not use ACF Collaboration Portal to store data collected as part of a Paperwork Reduction Act (PRA) Information Collection subject to OMB approval.

Is the PII shared with other organizations?

No

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

There are no formal notices and consent procedures specific to this system. At the time of hire, permanent and Direct Contractor personnel are given notice orally and in writing (forms) during the on-boarding process regarding the Agency's collection, creation and use of PII about them in relation to their work for the Agency.

ACF users provide their contact information as a practical requirement to meet their job functions and responsibilities, as well as to communicate with ACF about submissions.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

Individuals may not opt out of providing PII that is official contact information (name, work phone number and work e-mail address as it is necessary to establish and control access to ACF's ACF Collaboration Portal ; however, individuals may opt not to include other PII (e.g., personal contact info, photo).

Official contact data is necessary for access control and communication purposes. The system functions involve internal team-based document collaboration and project related communications, networking between team members, and knowledge sharing, all of which rely on official contact information.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

No such changes are anticipated. If ACF changes its practices with regard to the collection or handling of PII related to the ACF Collaboration Portal system, the Agency will adopt measures to provide any required notice and obtain consent from individuals regarding the collection and/or use of PII. This may include e-mail to individuals, adding or updating online notices or forms, or other available means to inform the individual.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

ACF Collaboration is not a system of records nor the primary source of records; however, the system stores copies of "collections" provided by the primary collections owners. Individuals who suspect their PII has been inappropriately obtained, used or disclosed in any ACF system can reach out to the ACF incident response team at ACF_IRT@acf.hhs.gov. All ACF Collaboration users are required to complete the ACF Privacy 101 training which provides the necessary information and instructions on how to report incidents pertaining to PII and Privacy to the ACF incident response team.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

ACF Collaboration is not a system of records nor the primary source of records, the requirement to maintain period reviews for data integrity, accuracy and relevancy is not applicable to this system. Availability of ACF Collaboration is managed, maintained, and ensured by AFC's General Support System's (GSS) inherited controls. The system is part of ACF's General Support System (GSS).

Identify who will have access to the PII in the system and the reason why they require access.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

ACF users (personnel and direct contractors) with valid network accounts who require access to ACF Collaboration portal must have supervisory Federal approval before access is granted.

Each program office within ACF reviews the system access list monthly to adjust users' access roles and permissions and delete unneeded accounts from the system.

Administrators and direct contractors must have an approved administrator/privileged account to access PII. The Agency trains site administrators regarding the appropriate use of access controls.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

The relevant supervisor will indicate on the user account creation form the minimum access that is required for the user to complete his/her job. The scope of access is restricted based on role-based criteria.

ACF Collaboration Portal roles are separated into group structures and are in compliance with the system hardening guidelines which restricts access by role and uses "least privilege" . Organizations using ACF Collaboration Portal site(s) will identify one or more site owners or administrators who will assume responsibility for the proper maintenance of the site, including access permissions. No one will gain access to a site unless specifically granted access by the site administrator. Site administrators are trained regarding the appropriate use of access controls.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

All system users at ACF complete annual mandatory computer security and privacy awareness training. This training includes guidance on Federal laws, policies, and regulations relating to privacy and data confidentiality, integrity, and availability, as well as the handling of data.

Describe training system users receive (above and beyond general security and privacy awareness training).

Not Applicable. No secondary training is completed.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.
GRS 3.2, Item 30- Information Security Records (NARA Citation: DAA-GRS-2013-0006-0003).

Temporary records: Destroy when business use ceases.

GRS 3.2, Item 31- Information Security Records (NARA Citation: DAA-GRS-2013-0006-0004).

Temporary records: Destroy 6 years after password is altered or user account is terminated, but longer retention is authorized if required for business use.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.
Administrative safeguards include user training; system documentation that advises on proper use; implementation of Need to Know and Minimum Necessary principles when awarding access, and others.

Technical safeguards include role-based access settings, firewalls, passwords, and others.

Physical controls include that all system servers are located at Parklawn facility protected by guards, locked facility doors, and climate controls.