

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

04/18/2022

**OPDIV:**

ACF

**Name:**

Child Welfare Archive for Training and Technical Assistance C-WATT

**PIA Unique Identifier:**

P-4051194-654910

**The subject of this PIA is which of the following?**

Major Application

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Implementation

**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.**

Contractor

**Is this a new or existing system?**

New

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

Child Welfare Archive for Training and Technical Assistance (C-WATT) will be used as a knowledge management and staff training tool. This system will facilitate information and knowledge sharing. It will empower staff to find answers to questions by searching through a shared resource library.

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

C-WATT will be used to collect and store the following:

Account information, specifically user account information such as user name, work phone number, work email addresses and C-WATT passwords for account verification.

Guidance that has been released officially to states and tribes.

Guidance emails that we have received over the years.

Information gathered through the discussion board function. Staff be able to give information or can

ask questions to help solve issues.

Internal documents that have been created to train new analysts.

Links to example documents housed in SharePoint.

Policy, rules, and regulations that govern our processes.

May include name, work phone numbers, work mailing address, and work email address of state and federal employees associated with email guidance, questions, examples, and other directives.

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

System Overview:

In anticipation of planned staff retirements, the Division of State Systems (DSS) wants to document the institutional knowledge and expertise of both retiring and remaining staff. We have determined that a knowledge management solution would help DSS effectively manage this transition, support new staff in their roles, and provide all staff with the tools to locate and use resources to provide prompt technical assistance and ensure the consistent application of policy in various circumstances. C-WATT will be used internally by approximately 9 Children's Bureau staff members and 6 contract staff members.

Information it will collect, maintain (store):

Account information, specifically user account information such as user name, work phone number, work email addresses and C-WATT passwords for account verification.

Guidance that has been released officially to states and tribes.

Guidance emails that we have received over the years

Information gathered through the discussion board function. Staff be able to give information or can ask questions to help solve issues.

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**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?**

100-499

**For what primary purpose is the PII used?**

The PII is the contact information of persons sending/receiving official correspondence. The correspondence is included for knowledge management and training purposes.

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

Not applicable; there is no secondary use for the PII in the system.

**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**

OMB #0970-0417

**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.**

For C-WATT users: System user information (email and user-established password) is collected for purposes of system logon. System users receive an email describing how their information is being used.

For individuals with PII in stored content: C-WATT is not the primary source for the information collected. The primary sources' systems are responsible for notifying individuals that their personal information will be collected and the purpose of that collection. Individuals provide content to other ACF systems, which are responsible for notifying individuals. Copies of this content may be placed in C-WATT.

**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.**

There is not a process in place as C-WATT is not the system that receives and stores individual-provided content including PII. The content is provided to other ACF systems, which are responsible for managing opt-out procedures. Copies of the content may be placed in C-WATT. C-WATT is not the primary source for the information collected. The primary sources' systems are responsible for notifying individuals that their personal information will be collected and the purpose of that collection.

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

For C-WATT users: The system administrators notify the C-WATT users when major changes occur to the system and obtain their consent.

For individuals with PII in stored content: Individuals provide content to other ACF systems, which are responsible for notifying them of changes and obtaining consent. Copies of this content may be placed in C-WATT. C-WATT is not the primary source for the information collected. The primary sources' systems are responsible for notifying individuals that their personal information will be collected and the purpose of that collection.

**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.**

For C-WATT users: C-WATT users can modify their PII as desired. They must contact a system administrator if denied access.

For individuals with PII in stored content: Individuals provide content to other ACF systems, which are responsible for resolving issues concerning the accuracy and use of the content. Copies of this content may be placed in C-WATT. C-WATT is not the primary source for the information collected. The primary sources' systems are responsible for notifying individuals that their personal information will be collected and the purpose of that collection.

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

For system users: System administrators review accounts annually and purge inactive accounts. System administrators are alerted by ACF supervisors and managers of departing employees so the C-WATT account may be deleted.

For individuals with PII in stored content: Individuals provide content to other ACF systems, which are responsible for reviews to determine data integrity, availability, accuracy, and relevancy. Copies of this content may be placed in C-WATT. C-WATT is not the primary source for the information collected. The primary sources' systems are responsible for notifying individuals that their personal information will be collected and the purpose of that collection.

**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/ACYF/CB/DSS (Division of State System) assigns users and determines access levels. The system administrators implement the Division's decisions.

**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.**

All users have at least read access to view all stored documents, which includes the limited PII stored in the system. Higher level access is determined by DSS.

**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 personnel including both direct contractors and government personnel are required to participate

in the ACF annual security compliance training and privacy training.

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

All users receive training on using C-WATT.

**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.**

The process is described in General Records Schedule 4.2, Item 140, Disposition Authority: DAA-GRS-2013-0007-0013

**Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.**

Administrative Controls: The administrators are DSS-designated Federal and contract, all of whom take ACF-required training. These administrators manage the system in accordance with DSS policies.

Technical controls - All PII is encrypted at rest and in transit. Only the strongest types of generally accepted, non-proprietary encryption algorithms are allowed. Acceptable algorithms should be reevaluated as encryption technology changes. The Bloomfire platform also secures the transmission of data using the HTTPS security protocol, which provides an encrypted connection.

Backups are performed using Amazon Web Services (AWS) tools and Amazon provides monitoring of the backup process as a part of the AWS services for Relational Database Service (RDS) and S3. They are encrypted and secure.

Physical controls - This is an outsourced service to utilize AWS' infrastructure. We have reviewed their System and Organization Controls (SOC) 2 report and deemed it sufficient.