

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

04/18/2022

**OPDIV:**

ACF

**Name:**

ACF Main

**PIA Unique Identifier:**

P-3807434-069993

**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?**

Yes

**Identify the operator.**

Agency

**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.**

Administration for Children and Families (ACF) Main is an informational website to share content with the public but is primarily for prospective and existing grantees about ACF's administration of various programs, grants, and initiatives that impact the nation's vulnerable children, families, and communities. It provides policies, guidance, and training and technical assistance to support the administration of various mission-driven mandatory and discretionary grants. The website also serves as a communications tool to promote awareness and transparency in how ACF administers its programs and initiatives.

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

ACF Main stores back-end user credentials to control system access. The system stores/shares content (files, images, and text) like outreach materials, press releases, leadership/staff bios (no PII), blogs, testimony, speeches, and other resources like budget, training & technical assistance, and policy documents related to ACF programs, grants, and initiatives in a database for dynamic display on the site to help grantees and partners execute mission related work. The system includes content

that references names, e-mail addresses, and phone numbers.

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

ACF Main is the Drupal 8 content management software used to organize, facilitate, and display content (files, images, text) that support mission-driven grant administration and communications about ACF's portfolio of programs and initiatives. The system stores/shares content (files, images, and text) that follows a content management lifecycle which includes outreach materials, press releases, leadership/staff bios, blogs, testimony, speeches, and other resources like budget, training & technical assistance, and guidance documents related to ACF programs, grants, and initiatives in a database for dynamic display on the site. The system maintains content and back-end user credentials to allow authenticated access to manage site content. The system includes content that references names, e-mail addresses, and phone numbers.

**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

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

The PII is used to provide authentication for user credentials (employees & contractors).

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

Not applicable - there is no secondary use of the PII in ACF Main.

**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 Main is internal to ACF. Members of the public do not submit information to ACF Main. The public has no access to the ACF Main environment. The PII collected is not subject to the Paper Reduction Act (PRA). Programs do not use ACF Main 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 is no formal notices and consent procedures specific to ACF Main. 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 collection, creation, and use of PII about them in relation to their work for the Agency.

## **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 Main.

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 Main, 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.**

There is no formal process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed. PII is only used to authenticate access to the system.

ACF Main 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](mailto: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.**

Integrity: Creating system accounts and access to email addresses is limited to federal users with designated admin permission levels in the Drupal Content Management System (CMS). OC staff work with program liaisons to determine respective users' operational need for system access. Liaisons are required to notify OC digital team when users no longer require access to the system or the need-to-know status changes. Those accounts that are not necessary are disabled. Such action may include revoking access privileges to the Drupal CMS. In addition, users who do not log into the CMS after 60 days are blocked and must contact OC digital team to reactivate accounts.

Availability: The Amazon Web Services (AWS) Backup and Recovery process will be performed and managed by the OCIO Operations Team. Full back-up snapshots of the AWS server volumes are taken daily at 12:00am EST. Notifications alert the Database Administrator in the event of a failed back-up and remediation options are provided to the Database Administrator. If the system goes down, it is restored within 48 hours.

Accuracy: Any accuracy concerns can be emailed to the OC digital communications team.

Relevancy: Individuals with user accounts (PII) in the Drupal CMS have the ability to update their email addresses once they have logged into the system with their passwords.

**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.**

Users' systems access is limited to the functions and information which is essential to their job functions. Administrators tasked with website management and oversight create user accounts with names, emails, and phone numbers upon supervisory designation/request after users complete training. Names, phone numbers, email addresses, and users credentials are the only PII maintained in the system.

**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.**

A segmented display and administrator functions limited to a select number of federal staff are in place to ensure that the minimum amount of information is available to perform their jobs.

**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.**

CMS Admin users are required to take mandatory security awareness training including: Annual HHS Information Systems Security Awareness Training; Annual HHS Privacy Training; and Reading the Rules of Behavior for Use of HHS Information Resources and signing the accompanying acknowledgment

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

Drupal CMS training; 508 training; Shared best practices

**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.**

User accounts are created as part of the user identification and authorization process to gain access and enable content management via the CMS. User accounts (PII) are deleted when business use ceases and are covered under National Archives and Records Administration (NARA) records schedule DAA-GRS2013-0006-0003.

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

Administrative controls include policies and procedures around protection of PII including personnel screening, security awareness training, system procurement, separation of duties and least privilege, security planning, change control, auditing and periodicity of security assessments and reviews. They also include complying with concepts of only collecting the minimum PII necessary to access the CMS.

Technical controls include the numerous automated capabilities that enforce the following: access permissions to PII, encryption of PII in transit and at rest, password and multifactor authentication requirements, audit logging/monitoring/alerting, network intrusion and prevention, protection against malware, separation of duties and least privilege.

Physical controls include facility security procedures such as protecting against unauthorized access to, loss of, and theft of PII, as well as procedures to protect the people who work on the CMS. Physical access to the information is restricted to only those users who have been granted access. Servers and major information system components are located in access-controlled server rooms, which are secured by proximity card-controlled access and the servers are housed in locked cabinets.

**Identify the publicly-available URL:**

[www.acf.hhs.gov](http://www.acf.hhs.gov)

Note: web address is a hyperlink.

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

Yes

**Select the type of website measurement and customization technologies is in use and if it is used to collect PII.**

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

Yes

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

Yes