US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
09/29/2016

OPDIV:

ACF

Name:

Child and Family Services Reviews Information Portal

PIA Unique Identifier:
P-8353803-597863

The subject of this PIA is which of the following?
Minor Application (stand-alone)

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.
Contractor

Is this a new or existing system?
New

Does the system have Security Authorization (SA)?
No

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.
The purpose of the Child and Family Services Reviews (CFSR) Information Portal is to support the Children's Bureau (CB), within the Department of Health and Human Services (HHS), to review State child and family programs to ensure conformity with the requirements of titles IV-B and IV-E of the Social Security Act. On January 25, 2000, HHS published a final rule in the Federal Register to establish the new review system. The final rule became effective March 27, 2000. The goal of the CFSRs is to improve child welfare services and to achieve the outcomes of safety, permanency, and child and family well-being.

Describe the type of information the system will collect, maintain (store), or share.
The Portal provides information and resources about the CFSR process, as well as authorized access to other CFSR applications. Data elements include state review planning materials, training modules, and CFSR Round 2 and Round 3 resource documents. For authorized CB users, there is review availability information on agile staff. Agile staff are (non-direct) contractors who support the CB as reviewers and site leaders during onsite reviews.

Their information is maintained in the Participant Database. The full site is available only to approved users. The portal is not intended for the use of the general public. The only PII that is maintained in an active state is in the CFSR Information Portal and the Participant Database.

On the Portal we collect and store name, e-mail address, phone number, and organization name. The Participant Database, a contact database, is internal and for limited JBS personnel (must be on the internal network) on a "need to know" basis. We collect and store the same contact information as in the Portal, as well as mailing address, taxpayer ID if applicable, and review and training history for all CFSR participants, such as agile staff.

In order to control system access as administrators, we collect the user name, password, and credentials of all portal users. No contractors or HHS staff use their HHS credentials to log into the system.

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

On the Portal specifically we collect for all users (HHS employees, contractors and state agency employees) and store name, e-mail address, phone number, and organization name. This information is collected in order to create and maintain a portal user account.

The Participant Database, a contact database, is internal and for limited JBS personnel (must be on the internal network) on a "need to know" basis. For our agile staff (non-direct contractors) we collect and store the same contact information as in the Portal, as well as mailing address, taxpayer ID if applicable, and review and training history.

User credentials are required and collected by the system (these are not HHS credentials).

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

Yes

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

Name

E-Mail Address

Mailing Address

Phone Numbers

Taxpayer ID

User credentials

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

Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

Track former and current review team members and potential agile staff/consultants for the project.

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

None

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

42 U.S.C. 621 et seq., 42 U.S.C. 670 et seq., 42 U.S.C. 1302.

The 1994 Amendments to the Social Security Act (SSA) authorize the U.S. Department of Health and Human Services (HHS) to review State child and family service programs to ensure conformance with the requirements in titles IV-B and IV-E of the SSA. On January 25, 2000, HHS published a final rule in the Federal Register to establish a new approach to reviewing and monitoring State child welfare programs and services. Under the rule, which became effective March 27, 2000, States are reviewed for substantial conformity with certain Federal requirements for child protection, foster care, adoption, family preservation/family support, and independent living services. The Children's Bureau, part of the Administration for Children and Families (ACF) within HHS, administers the review system, which comprises two review components: (1) CFSRs; and (2) title IV-E foster care eligibility reviews.

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

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

Children's Bureau Child Welfare Reviews Project (CWRP) HHS/ACF/CB; System #: 09-80-xxxx

SORN is In Progress

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

Hardcopy

Email

Online

Government Sources

Within OpDiv

Non-Governmental Sources
Private Sector

Identify the OMB information collection approval number and expiration date
OMB Control Number: 0970-0214 Expiration Date: 2/28/2018

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.
Users of the portal agree to System Use Notification and Rules of Behavior, as well as a Privacy Policy specifying collection of user information. Individuals seeking to determine whether this system of records contains information about themselves should address written inquiries to the System Manager.

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 cannot opt out of the collection of their information because users must request access to the Portal and that must be approved by ACF. Data contained in the Participant Database is processed as part of contract or agreement with the individual to be part of the review team, agile staff/consultant.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
If there is a change in purpose or use of the PII data collected users would be informed via the Portal. Once the change is posted, the user would log in and have to re-accept the agreement in order to access the system. If they do not accept, they would not be able to access.

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.
If there are concerns regarding whether or not PII has been inappropriately obtained, used, or disclosed, the person would contact us via information provided in the portal. Information is provided in the Contact Us section and also privacy policy and system use agreements. The Child Welfare Reviews Project (CWRP) Help Desk can be contacted via phone, email, or chat during business hours.   Requests concerning misuse of PII would be escalated to management.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.
Users of the Portal maintain their limited PII. JBS staff maintain the data in the Participant Database via data reviews and updates based on new information from individual, such as agile staff/consultant agreement. All security and PII related documentation is reviewed on an annual basis or whenever there is a needed change to the documentation. Accounts are automatically deactivated when passwords are not change within specified period of time. When we learn that an account is deemed inaccurate and should no longer have access, we manually deactivate the account.

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

Users:
Selected user role with "need to know" basis.

Administrators:
System administration user role

Developers:
Active programmer of the system

Contractors:
Not direct contractors; in role of system administrators and programmers

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.
Only those with active "need to know" basis in order to conduct project business. Access is determined by whether or not the person requires access to the information in order to be able to conduct their job, specifically the duties or tasks assigned to them. Need to know is used to limit and create the smallest number of users that require access to information. We periodically review and update access if duties have changed.

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.
Role-based authorization into system is established. Only those with active "need to know" are allowed access to the system.

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.
Security Awareness Training is provided to all JBS employees. Additional project-specific training is provided to IT staff and project staff that have access to the system. Project staff also completes the annual HHS security trainings.

Describe training system users receive (above and beyond general security and privacy awareness training).
Project staffs are trained in use and management of the system. IT staff are also trained in the system, including security components and processes required by the project. Specific project staff and IT staff are trained on Incidence Response and Disaster and Recovery.

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.
ACYF/CB is in communications with the ACF Records Manager to determine the specific National Archives and Records Administration (NARA) retention schedule. All records will be retained until a determination is made as to the final records disposition schedule. Once established the records will be disposed of consistent with the records disposition schedule.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.
A System Security Plan (SSP) is in place for the system. This plan addresses administrative controls such as audit, accountability, certification, assessment, and accreditation. This plan addresses technical controls such as identification, authorization, and access controls (e.g., lockout after unsuccessful login attempts, session timeout, and encryption). This plan addresses physical controls such as physical access (access to building and servers) and environmental controls (e.g., temperature, humidity, and emergency power).