

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

05/31/2022

OPDIV:

ACF

Name:

Community Services Block Grant Performance Management

PIA Unique Identifier:

P-8533245-499186

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?

Yes

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.**

The Community Services Block Grant (CSBG) is authorized by the Community Services Block Grant Act, Title VI, Subtitle B, of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended; Human Services Amendments of 1994, P.L.103-252; the FY 1996 CSBG Appropriation Legislation, P.L.104-134; CFR Title 45, Part 96; Coats Human Services Reauthorization Act of 1998, P. L. 105-285, Department of Health and Human Services Block Grant Regulations and Current Poverty Income Guidelines – referred to as the CSBG Act.

More specifically, Section 676 of the CSBG Act requires states and United States (US) territories to submit an “application and plan” (referred to as the CSBG State Plan) in order to receive CSBG funds. Additionally, Section 678E of the CSBG Act also requires these grantees to prepare and submit an annual report on the measured performance of the state/territory and any CSBG sub-grantees therein.

To meet the requirements of Section 678E, the CSBG Network implemented a Performance

Management Framework to ensure local, state, and Federal accountability. Office of Community Services (OCS) has automated the application, plan, and annual report to further enhance its ability to capture, report, and analyze data. State-level grantees submit their application, plan, and annual report through the On-Line Data Collection system (OLDC), which is a separate application within ACF.

Following submission and review of the data submitted via OLDC, OCS downloads an extract of the data and imports it to the Data Warehouse database on the CSBG Performance Management website (PMW), as OLDC does not have a data analysis component (e.g., a dashboard for state and federal documentation of progress). This provides each state with access to its own data. Grantees will only be able to access this preliminary data via a username and password for early analysis. Once the data has been reviewed and approved by OCS, the data will be made available to grantees.

The data available in the CSBG PMW Data Warehouse are the same data that flow into the annual Report to Congress. The data contain aggregate values for states and local agencies. The data will be made available to the general public after an initial period during which the data are made available only to OCS and grantees.

The purpose of the CSBG PMW is to create a tool that will provide the data analysis capabilities and performance management resources that are currently not available through OLDC for CSBG data. Within the website, OCS, CSBG grantees, and the general public will be able to conduct comparisons of aggregate program data, which can be sorted by year, state, ACF region, and across the nation. Data can be viewed in different formats including narratives, pie graphs, and tables.

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

The system does not collect data. The system maintains and publicly shares information from CSBG grantees' application and plans, and annual reports as required by the CSBG Act, Section 675C(c) (B)(vi)(II).

A significant portion of the information within the system includes textual narrative accounts of the following:

- State plan development and statewide programmatic goals about how services will be provided to the community;
- CSBG hearing requirements for how grantees are to announce to the general public a hearing regarding their application and plan; the State use of how grantees are spending CSBG funding and how it aligns with the CSBG act;
- the training and technical assistance provided by grantees to their sub-grantees, such as how the grantee developed a training and technical assistance plan, and which organizations they work with to provide the training;
- how grantees are communicating with sub-grantees and promoting partnerships with other organizations; how grantees monitor the sub-grantees, including a schedule for when and which sub-grantees will be monitored, corrective actions for deficiencies identified during monitoring, fiscal controls, and the designation, de-designation, or termination of sub-grantees;
- how individuals are found eligible for services based on poverty lines (no specific individual information); and
- how grantees are performing based on national performance indicators.

In addition, the CSBG PMW Data Warehouse maintains the following information from the grantee reports: state legislation and regulations in the form of a hyperlink; information on CSBG Eligible Entities (sub-grantees within the state) including business name and the geographical area that they

serve; standards for eligible entities such as performance measures and the sub-grantees respective outcomes as provided through aggregate data on the website.

Usernames, passwords, state name/code, and email addresses are collected and maintained in order to establish user accounts within the CSBG PMW. CSBG PMW also collects name and phone numbers.

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

The website is a publicly facing performance management website with CSBG data and a secure portal within the website for internal review and analysis of CSBG data by OCS and technical assistance grantees (indirect contractors utilized on an as needed basis). The system hosts information available in the application and plans, and annual reports submitted by CSBG state-level grantees via OLDC. CSBG state-level grantees and the public alike will be able to access the most currently available CSBG data. However, prior to approval by OCS, state-level grantees are only able to view their own data. Technical assistance providers (funded through a cooperative agreement or contract) may have access to this data via the private portal prior to OCS' approval of the data, as deemed necessary by OCS.

OCS collects an email address in order to create users accounts for the private portal (including a username and password). Additionally, name and phone numbers are collected. It will also share publicly available information from the application and plan, and annual report as required by the CSBG Act, Section 675C(c)(B)(vi)(II) to be publicly available. This information includes CSBG Administrative Information; State Legislation and Regulation; State Plan Development and Statewide Goals; CSBG Hearing Requirements; CSBG Eligible Entities; Organizational Standards for Eligible Entities; State Use of Funds; State Training and Technical Assistance; State Linkages and Communication; Monitoring, Corrective Action, and Fiscal Controls; Eligible Entity Tripartite Board; Individual and Community Income Eligibility Requirements; and Performance Management.

All of this information will be stored temporarily for a minimum of 3 years after final action.

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

Yes

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

-User Credentials (Username and Password).

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 primary purpose of PII is to establish a user account.

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

This is not applicable. There is no secondary use of the PII collected.

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

Community Services Block Act of 1981 (CSBG Act), as amended by the Community Opportunities, Accountability, and Training and Educational Services Act of 1998 (Public Law 105-285) 42 U.S.C. Section 9903.

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 No: 0970-0382, expires 08/31/2024

OMB No. 0970-0492, expires 06/30/2024

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 requesting an account on the CSBG PMW are notified with the following statement: "By submitting a request to create an account, you are consenting to the collection of personally identifiable information (PII). We do not collect PII about you unless you choose to provide that information to us. Any personal information you choose to provide is protected by security practices. ACF does not disclose, give, sell, or transfer any personal information about our visitors unless required by law enforcement or by Federal Law."

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.

The collection and use of PII is a practical requirement to gain access to the system for authentication purposes. Users are aware that if they choose to opt-out of providing their PII, they will not have access to the system. In the case that a user no longer needs access, the System Administrator will remove their account from the system. This will include purging their PII from the user management system.

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

Whenever there is a major system update, the system will send automated email notices to all registered and authenticated users in advance of updates being made. OCS may follow-up with an additional email.

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.

Users – including public users, federal, and grantee staff (not included in the grantee's application and plan in OLDC) – concerns must be emailed electronically to a CSBG PMW system administrator. The CSBG PMW system administrator email address will be provided when new users request an account through the website.

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

Data integrity is maintained by limiting the number of users who can update PII. Only system administrators and those to whom the PII belongs can update PII. This is achieved by using role-based access. All new user registrations are done through email verification, and notifications will be sent to a Web Manager (OCS staff) for vetting.

Data availability is maintained through daily back-ups using an enterprise backup and recovery management software. The backup will reside as a directly attached storage device, allowing for immediate access, in the event a recovery is required. A monthly backup will also be implemented and archived to be replaced at the end of each month. In the case of a catastrophic site disaster, data will also be backed up offsite on the cloud via Microsoft Azure backup.

Data accuracy/relevancy is maintained by reviewing user accounts every six months to ensure that the information is accurate and relevant. Users with inactive accounts past six months are contacted to verify if they still need the accounts. If accounts are no longer needed, they are deleted and PII is purged from the system.

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.

The system is built to only allow the Web Manager (OCS staff) and the System Administrator access to PII. No other system users can access PII.

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 system Contracting Officer's Representative (COR) reviews and approves the request for access to the system. Following the "least privilege" and "role-based" access principles, users are given the minimum levels of access – or permissions – needed to perform their job functions. OCS intends that for those who have access to PII, such access is limited to the information that allows them to troubleshoot login errors (such as username and password recovery). Web Managers will also be able to assist with these types of functions.

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 direct and indirect 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).

At this time, system users do not receive any training above and beyond general security and

privacy awareness training.

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 data in the CSBG PM system will follow a specific retention and destruction schedule approved by the National Archives and Records Administration (NARA). PII found within the records, including those related to the application, plan, and user accounts, are all related to the coordination, implementation, execution, monitoring, and completion of grant and cooperative agreement programs. These records will be destroyed three years after final action is taken on the file, but longer retention is authorized if required for business use. The disposition authority number is DAA-GRS-2013-0008-0007 (GRS 1.2, Item 010).

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

Administrative:

Only the Web Manager and System Administrator will have access to PII information stored on the website. New user registration notifications will be sent to a Web Manager for vetting. New users will register through an online new account request. This prevents robo-registrations and fake account setup.

The System Administrator also conducts reviews of threats and/or vulnerabilities and their remediation status, and then conducts knowledge transfer with key personnel and management upon findings.

Technical:

Data is encrypted using government-approved TLS protocols (version 1.3)/ HTTPS security controls with strong ciphers. Physical:

Web hosting is at the government-approved Data Center. The data center restricts physical access to approved personnel with keycards. Access is over a secure fiber link to the Data Center with fully redundant power supply, Fire suppression, and Faraday shielding which protects against electromagnetic threats.

Identify the publicly-available URL:

<https://csbgpm.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