

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

11/30/2023

OPDIV:

ACF

Name:

First-line Access System for Training, Technical Assistance, Resources, and Communications (FastTRAC)

PIA Unique Identifier:

P-4440736-334548

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.

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 purpose of the FastTRAC system is to provide ongoing, data-driven, custom training and technical assistance for grantee organizations across the US. Grantee organizations providing community support for Office of Family Assistance's (OFA's) Healthy Marriage Responsible Fatherhood (HMRF) program are invited to select FastTRAC to store Point of Contact (POC) information of persons fulfilling roles required for grant compliance and to evidence (timestamp) Training and Technical Assistance (TTA, often further abbreviated TA) service events required for grant compliance.

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

Section 413 of the Social Security Act (42 U.S.C. § 613) governs the collection of PII with FastTRAC scope. ACF collects grantee team member name and email information as a condition for grant consideration and, upon grant, shares this information with FastTRAC account managers to extend FastTRAC invitations to each grantee team member. FastTRAC collects, maintains, and shares POC, funding, and performance information between ACF, direct and indirect contractors, and

grantees associated within the scope of a given OFA HMRF TTA grant contract. Timestamps evidencing use of FastTRAC TTA services are collected and maintained (with sharing currently deferred to the grantee to provide to ACF through alternative channels).

FastTRAC contains POC information, to include an individual's: First and Last Name, Email Address, Work Address, Work Phone Number, Mobile Phone Number(s), and Profile Picture. Contact information collected fosters communications.

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

FastTRAC collects POC, funding, and performance-related information. FastTRAC contains POC information, to include an individual's: First and Last Name, Email Address, Work Address, Work Phone Number, Mobile Phone Number(s), and Profile Picture. Contact information collected fosters communications. Stored information will persist pursuant to grant renewal. Participation is voluntary for all participants to facilitate communications and maintain performance transparency.

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

Yes

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

Work Address

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

Grantee Staff

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

PII is primarily used by Point of Contacts as quick reference for communications to call or email users with a question or response.

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

All privileged users supporting this GSS are required to complete the privileged users training annually.

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

Section 413 of the Social Security Act (42 U.S.C. § 613)

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 CONTROL NUMBER: 0970-0531

EXPIRATION DATE: 09/30/2025

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.

Grant recipient users will be notified through an annual email communication. In this email, users will be notified of the type of PII collected and its purpose.

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.

Grant recipient users will receive an annual email notifying them of the PII collected through the FastTRAC system. In this email, users will be provided the option for opt-out of PII collection for relevant individuals (i.e., grant recipient program staff). In addition to name and email address information provided by ACF for communications purposes, prospective users must agree to utilize Multi-factor Authentication (MFA) authentication. Opting out of using MFA means not having access to FastTRAC. The submission of POC information beyond name and email is optional and limited to address and photograph.

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

Notification of major changes to the system (such as updates to the privacy policy) are emailed to all FastTRAC users to include instructions for requesting account termination from the account management role played by a FastTRAC TTAP (Training and Technical Assistance Partner) for users electing not to accept a change following initial 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.

A user has the option of revising inaccurate PII through FastTRAC's self-service user profile interface. Users can submit any PII concern through a the TTAP helpdesk request. The request is reviewed by FastTRAC staff. When the TTAP help desk gets a report from user concerned their PII has been inappropriately obtained, used, or disclosed; the TTAP help desk is required to immediately notify the FastTRAC IRP Coordinator to coordinate further response with ACF IRT and other resources as needed. The staff works with the user to resolve the request.

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

On a quarterly basis TTAP help desk staff review data profiles of 1-3 grantees. The data is reviewed against a data snapshot from 12 months prior and TA activity over the prior 12 months that would impact that data. User's may review PII in their user profile and revise as need to improve accuracy and relevance of their POC information. Reasons for selecting Amazon Web Services Infrastructure as a service (AWS IaaS) include high availability access to data. Ruby account management gems selected for their proven integrity.

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.

FastTRAC Technology and Training Assistance Partners (TTAPs) play an account manager role and, in conjunction with system owner approval, configure accounts for grantee and team within the scope of each grant as well as configuring accounts for FastTRAC and ACF support staff providing services to all participants across all grants.

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.

Access to the PII in the system is determined through system roles that operate on the principle of least privilege. Users are granted access based on their roles to complete 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.

All personnel including both direct and indirect contractors and government personnel using the system are required to participate in annual security compliance training and privacy training and are made aware of their responsibilities around data collection and maintenance in two additional ways: 1) Reviewing a pre-recorded webinar and 2) Reviewing a FastTRAC admin user guide.

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

Users have access to a FastTRAC user guide. Users can also contact a helpdesk for specific questions. The user guide provides step-by-step training for how users may access TTA services.

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.

FastTRAC retention schedule is under National Archives and Records Administration (NARA) review.

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

Administrative: RBAC (Role Base Access Control) is implemented for application users. Permission are assigned based on the roles and only users with admin roles can access PII

Technical: The data is encrypted at rest and transit. Updating the data is restricted by role.

Physical: Physical:

Amazon's AWS data centers follow and enhance best practices in data center physical security. The exterior physical security is military grade. Personnel entering the data center are authorized and verified by a government issued ID and two-factor authentication at each entry point. Each entrance is monitored by video surveillance, and all access is logged and audited. All visitors and contractors must present identification and are signed in and continually escorted by authorized staff.

Identify the publicly-available URL:

<https://hmrffasttrac.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