US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
05/29/2024

OPDIV:
ACF

Name:

National Responsible Fatherhood Clearinghouse Website

PIA Unique Identifier:
P-2469628-051735

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?
Existing

Does the system have Security Authorization (SA)?
Yes

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

Describe in further detail any changes to the system that have occurred since the last PIA.
Multi-Factor authentication has been implemented for privileged user access.

Describe the purpose of the system.
The National Responsible Fatherhood Clearinghouse (NRFC) website (https://fatherhood.gov/) supports the Office of Family Assistance (OFA) NRFC project designed to support and engage fathers and responsible fatherhood educators and stakeholders. The public facing serves as information repository for fathers, fatherhood programs, researchers, and policy makers.

Describe the type of information the system will collect, maintain (store), or share.
There are two main categories of information collected, maintained, and shared by Fatherhood.gov, information directly geared towards fathers and information resources for programs and organizations supporting fathers.
Information provided for fathers includes the following: tips and suggested activities textual content

for fathers including topics such as 'parent/teacher groups', sports coaching, homework help, volunteering, and 'dad jokes'(a wholesome joke of the type said to be told by fathers with a punchline that is often an obvious or predictable pun or play on words and usually judged to be endearingly corny or unfunny) accompanied by related Uniform Resource Locators (URLs) and videos; fatherhood program and organization names and contact information (street address, city, state, zip code, phone number, email address) affiliated Administration of Children and Families (ACF) Region if applicable; event information including event title, event type (examples), date, time, location(city, state), event details; various hotline phone numbers (e.g. National Suicide Prevention Lifeline); blog entries and blog author, title, organization, organization's website URL, brief author biography, and photograph.

Information related to fatherhood programs includes the following: a toolkit for new or existing fatherhood programs that provides various written guides, online resources, and hotline phone numbers for programs to become more effective; NRFC webinar slide decks and transcripts including the webinar title, presenter(s)) first and last name, presenter(s) brief biography and photograph, facilitator(s) first and last name, and location (city and state); NRFC's radio Public Service Announcement (PSA) audio clippings, library resources and authors of those resources including title of the resource, abstract, date added, article Digital Object Identifier (DOI), resource library identification number, date, page count, publication year, resource link, journal issue, journal name, journal date, journal pages, journal volume, type of resource, corporate author, personal author (name), portable document file (PDF) link, resource video duration, resource format, resource language, resource pagination.

Additional information collected and maintained by the website includes:
1) Email addresses of users who need support or want to subscribe to a listserv to receive regular fatherhood updates.
2) Website survey responses which include answers to the following questions: if the page was helpful, reasons the page was helpful, reasons the page was not helpful, and how we can improve the page.

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

Fatherhood.gov is a public website designed to disseminate information about the National Responsible Fatherhood Clearinghouse (NRFC). The information collected, maintained, and shared with the public on the website is all voluntarily provided individuals in the responsible fatherhood community. This information includes dad jokes submitted by the community via "https://www.fatherhood.gov/dad-jokes#bottom_left" information includes title, joke, and optional link to a YouTube video. After submission, approval is done by the NFRC team for posting. Approved events, blogs on responsible fatherhood, and a library section containing helpful resources.

Additional information collected by the website includes survey responses on the helpfulness and use of the website and email addresses for individuals whole elect to receive regular website and program updates or have any questions. The team responsible for approving and updating content on the website do so through the website platform, Drupal content manager. There are no user credentials collected or maintained by the website itself. Website users do not login to submit dad jokes or events. They do so as anonymous users. The Content Managers (contractors) use their Drupal login to view these submissions. There are forms on the website for users to submit dad jokes and events. Submission of blogs happens outside of the website. The NRFC team reaches out to authors and in some cases, authors reach out to the NRFC team about writing a blog for the website. The NRFC team gives blog authors a form/template in MS Word to complete and send via email.

Fatherhood.gov within the Federal Risk and Authorization Management Program (FedRAMP)

Amazon Web Services (AWS) Cloud Platform. User credentials are not stored in the fatherhood.gov system, but rather on AWS which maintains it's own Privacy Impact Assessment (PIA).

All records created and maintained on the website will be stored indefinitely until a records retention schedule is approved by the National Archives and Records Administration (NARA), with the exception of general system records which are maintained temporarily in accordance with NARA General Records Schedule 3.2 Item (030).

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

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

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

How many individuals' PII is in the system?
5,000-9,999

For what primary purpose is the PII used?
The primary purpose of Personal Identifiable Information (PII) collected on public citizens is to provide support or regular website and program updates. The primary purpose of the PII collected on the vendors and contractors is to associate authors to blog posts and library resources.

Describe the secondary uses for which the PII will be used.
There are no secondary uses for any PII collected.

Identify legal authorities governing information use and disclosure specific to the system and program.
22 USC 7104(b); 22 USC 7105(b)(1)(G); 22 USC 7105(c)(4); 22 USC 7105(f); 42 USC 1314b

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
      0970-0401expries: 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.
    All data collection is done online through the website and supporting forms which provide statements to inform the individual about the collection of personal information. Only email addresses are collected thru Subscribe and Contact Us forms and there is a disclaimer message that reads – By submitting this form, you are consenting to allow fatherhood.gov to retain your email address.

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 no formal opt-out process for the collection of PII. All information collected is done voluntarily and is initiated by the individual who is interacting with the website.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
    Email address is the only PII collected for both authenticated users (system admins and content managers) and for listserv subscribers. An email notification is sent to all authenticated individuals and listserv subscribers when major changes to the system concerning disclosure or data uses will occur. No response to the email notification is taken as user consent. Contact information will be provided on the homepage of the website for users to leverage if they wish to ask a question or register a concern. In the event that a suspected or known breach has occurred, it will be reported to the Administration for Children and Families (ACF) incident response team to be handled in accordance with ACF policy. If the website needs to go offline for maintenance an "under maintenance" message will be posted on the website. Maintenance will be scheduled after regular business hours to minimize the user impact.

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.
    The NRFC team will provide support for individuals who indicate concern that PII has been inappropriately obtained, used, or disclosed, or that PII is inaccurate. To support initial reporting of concerns, Fatherhood.gov will include contact information for NRFC support staff on the home page, contact information can be found at https://www.fatherhood.gov/about-us/contact-us. Once contacted, NRFC staff will establish a ticket associated with the concern and track progress towards issue resolution. The concerned individual will be contacted via their preferred contact method (email or phone). The NRFC team will report to the ACF Incident Response Team any concerns reported identifying a suspected or confirmed incident.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.
    Fatherhood Programs vetted, approved, and featured on the website will be contacted annually and asked to update their information in order to ensure data accuracy; their edits will also be reviewed and posted on the website by the NRFC team to ensure continued relevancy. Information integrity and availability will be ensured through information system monitoring and configuration of event logs to monitor data field changes, provide notifications to the system administrator when certain data events occur, and the ability to generate audit reports at regular intervals.
    System tests will also ensure that PII is only available to authorized individuals in association with their assigned role.

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.

As a public website, the primary user base is public citizens visiting the site. The PII available on the website is minimized to only what is needed. The remaining users, namely administrators, are restricted based on job responsibility and then appropriate system roles based on segregation of duties. Content managers have access to the PII from individuals that submit questions or content to be vetted in order to respond to those individuals and to the PII for resources and blogs to update the author information. Administrators have access to content as well as account management 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.

Each role within the application is limited in its privileges to control access and integrity of the PII. There are 4 roles in the system that are assigned to users based on their job responsibilities. There are 4 roles:
- Anonymous Users can view any published content on the website;
- Authenticated Users are the ones who have an account to login to drupal;
- Administrators have access to enter, modify, and delete any content. In addition, they have access to create, modify, and delete user accounts and manage permissions;
- Content Managers can create, modify, and delete content. They do not have access to view or manage user accounts.

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 authenticated users participate in annual security awareness training provided by and tracked internally by the contractor.

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

There is no additional training provided.

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 system follows NARA General Records Schedule 4.2 for retention and disposal of Privacy Act and related PII information.

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

Fatherhood.gov is hosted within the Federal Risk and Authorization Management Program (FedRAMP) Amazon Web Services (AWS) Cloud Platform and has implemented and appropriately scoped and tailored low impact baseline of National Institute of Standards and Technology Special Publications (NIST SP) 800-53 Rev4 administrative, technical, and physical controls following the NIST Risk Management Framework.

The administrative security controls employed include annual awareness training for all users holding accounts for the system and role-based access control.

The technical controls are shared between the system and the AWS platform. The system provides controls such as multi- factor authentication for all authenticated users and role-based system access to control the amount of PII available to a user; and AWS provides infrastructure controls such as secure network access points.

The physical controls will all be inherited by the AWS platform and include the following: Restricting physical access to the data center both at the perimeter and at building ingress points through the help of video surveillance, intrusion detection systems, and 2 rounds of two-factor authentication for each individual accessing a data center floor. Visitors and contractors are required to have Identification (ID), sign-in with building security, and be always escorted by an authorized staff. Fire detection and suppression systems; Uninterruptible Power Supply (UPS); Climate and Temperature control; and Preventative maintenance

Identify the publicly-available URL:

Fatherhood.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 uner 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