## Privacy Impact Assessment (PIA): HRSA - OTART - QTR1 - 2020 - HRSA580679

Date Signed: 5/8/2020

Acronyms

ATO - Authorization to Operate

CAC - Common Access Card

FISMA - Federal Information Security Management Act

ISA - Information Sharing Agreement

HHS - Department of Health and Human Services

MOU - Memorandum of Understanding

NARA - National Archives and Record Administration

OMB - Office of Management and Budget

PIA - Privacy Impact Assessment

PII - Personally Identifiable Information

POC - Point of Contact

PTA - Privacy Threshold Assessment

SORN - System of Records Notice

SSN - Social Security Number

URL - Uniform Resource Locator

## **General Information**

**PIA ID:** 1078758

PIA Name: HRSA - OTART - QTR1 - 2020 - HRSA580679

HRSA - Online Technical Assistance Request

Tool

OpDiv: HRSA

	PTA	
PTA - 1A:	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
PTA - 1B:	Is this a FISMA-Reportable system?	Yes
PTA - 2:	Does the system include a website or online application?	No
PTA - 3:	Is the systemor electronic collection, agency or contractor operated?	Contractor
PTA - 3A:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA - 5:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
PTA - 5A:	If yes, Date of Authorization	6/7/2019
PTA - 6:	Indicate the following reason(s) for this PTA. Choose from the following options.	New
PTA - 8:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions?	The purpose of the Online TA Request Tool (OTART) system is to support the efforts of the Division of Home Visiting and Early Childhood

Title:

Systems and its grantees by administering Technical Assistance to the Federal Program. The Maternal, Infant, and Early Childhood Home Visiting (Federal Home Visiting Program) Program responds to the diverse needs of children and families in at-risk communities and provides an unprecedented opportunity for collaboration and partnership at the federal, state, and community levels to improve health and development outcomes for at-risk children through evidence-based home visiting programs.

This Federal Home Visiting Program is designed: (1) to strengthen and improve the programs and activities carried out under Title V; (2) to improve coordination of services for at-risk communities; and (3) to identify and provide comprehensive services to improve outcomes for families who reside in at-risk communities. Services include developing needs assessments and technical assistance plans, providing technical assistance webinars, one-on-one TA occurrences, webinars for model developers and grantees, monthly communities of practice conference calls, issue briefs, monthly e-newsletters for grantees, and an online collaboration portal.

The OTART system is a web-based service database that includes 5 sections: one to submit awardee contact information and description of technical assistance needs, a second section collecting information on the approval process, a third section collecting data on the delivery of technical assistance, a fourth section with data summarizing the completion of the technical assistance including potential contact information from the awardee team to participate in a separate satisfaction survey, and a final section that collects data on the TA Specialist experiencing providing TA including their level of confidence and sense of readiness.

EDC staff who have been contracted by HRSA to develop and manage OTART, as well as respond and deliver technical assistance to MIECHV awardees, and evaluate satisfaction of TA received, will enter quantitative data and upload customized TA Engagement documents and Close out Reports that summarizes TA activities delivered (i.e. conference calls, resources shared, facilitated discussions, site visits).

Summary data will be used to inform national and state TA needs, identify trends and challenges to inform policy and future resources.

List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.

Information will include system user information including system-assigned username and hashed password; initiative participant data including name, email address, phone numbers, agency

affiliation, and general role; awardee needs, objectives, and desired outcomes; approval process data; dates and descriptions of technical assistance (TA) interactions.

The system will also store summary data, including training and technical assistance accessed, contact information for completion of satisfaction surveys, and TA Specialist experience. Because this initiative does not involve the provision of direct social, mental health, or other health services, the system will not be used to store any personally identifiable health information.

All users are required to authenticate before being authorized to interact with the system.

PTA -9A:

Are user credentials used to access the system?

Yes

PTA - 9B:

Please identify the type of user credentials used to access the system.

**HHS User Credentials** 

**HHS Email Address** 

**HHS Password** 

**HHS** Username

Non-HHS User Credentials

Email address

Password

Username

PTA - 10:

Describe why all types of information is collected (into), maintained, The TA Request Tool is a web-based service and/or shared with another system. This description should specify database that includes 5 sections: one to submit what information is collected about each category of individual awardee contact information and description of

The TA Request Tool is a web-based service database that includes 5 sections: one to submit awardee contact information and description of technical assistance needs, a second section collecting information on the approval process, a third section collecting data on the delivery of technical assistance, a fourth section with data summarizing the completion of the technical assistance including potential contact information from the awardee team to participate in a separate satisfaction survey, and a final section that collects data on the TA Specialist experiencing providing TA including their level of confidence and sense of readiness.

Education Development Center (EDC) staff who have been contracted by HRSA to develop and manage the TA Request tool, as well as respond and deliver technical assistance to MIECHV awardees, and evaluate satisfaction of TA received, will enter quantitative data and upload customized TA Engagement documents and Close out Reports that summarizes TA activities delivered (i.e. conference calls, resources shared, facilitated discussions, site visits).

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PTA - 10A:

Are records in the system retrieved by one or more PII data

Yes

	elements?	
PTA - 11:	Does the system collect, maintain, use or share PII?	Yes
	PIA	
PIA - 1:	Indicate the type of PII that the system will collect or maintain	Name
		E-Mail Address
		Phone numbers
		Photographic Identifiers
		User Credentials
		Others - Agency Affiliation
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared	Business Partners/Contacts (Federal, state, local agencies)
		Employees/ HHS Direct Contractors
		Public Citizens
		Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system	201 - 500
PIA - 4:	For what primary purpose is the PII used?	Site account holders names are used as usernames and their email addresses are used for inviting them to the site and sending notifications from the site. Account holders are able to upload their photograph as part of their profile. For awardees name, email and phone numbers are collected for the purpose of coordinating and delivering TA. Name and email addresses are collected for satisfaction survey recipients in order to send surveys.
PIA - 7:	Identify legal authorities, governing information use and disclosure specific to the system and program	5 USC 301, Departmental regulations
PIA - 9:	Identify the sources of PII in the system	Directly from an individual about whom the information pertains
		Online
		Government Sources
		State/Local/Tribal
PIA - 10:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11:	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	System users are made aware of information collection at the time of account creation. Notification to state designated awardees is separately performed by awardee states.
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 13:	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 option to opt out of the collection of names, email addresses or phone numbers as they are required for the functioning of the program.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur	Individuals whose PII is involved in this system are notified by email of any major changes in the

	to the system (e.g., disclosure and/or data uses have changed	system that will affect their information.		
	since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained			
PIA - 15:	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 no process exists, explain why not	Upon receipt of request to resolve an individual's concerns about PII, the Project Director will email a letter of response to the individual and take appropriate steps to resolve the concern within a reasonable timeframe.		
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not	Project staff are notified of users or Awardees who are no longer part of the program. System user profiles are decommissioned.		
PIA - 17:	Identify who will have access to the PII in the system and the reason why they require access	Users		
	reason with they require access	Administrators		
		Developers		
		Contractors		
PIA - 17A:	Provide the reason of access for each of the groups identified in PIA-17			
	Users - Users are able to update their profile information and acces	s and enter TA provision data into the system		
	Administrators - Administrators make necessary system changes, a	add users and monitor the system		
	Developers - Common Media is the vendor responsible for maintaining and making code changes to the system			
	Contractors - Certain EDC staff, as non-direct contractors, administractors using HHS credentials.	ter and maintain the system. There are no direct		
PIA - 17B:	Select the type of contractor	Third-Party Contractor (Contractors other than HHS Direct Contractors)		
PIA - 18:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Only those staff given an Administrator role on the site may access names and email addresses of users. Administrators are limited to the TA Manager, Development Team, Research Assistant and Project Coordinator.		
PIA - 19:	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job			
PIA - 20:	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	Project staff are provided with annual information security training that includes training on the handling of PII as well as general awareness of security and privacy concerns.		
PIA - 21:	Describe training system users receive (above and beyond general security and privacy awareness training).	All users receive the TA Request Tool Training Guide. Administrators receive a site-administration level guide created by the Development Team. Periodic training (overview of the tool and how to use it) is scheduled at least 2 times per project year and available upon request for users of the system.		
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	Per 48 CFR 4 Subpart 4.7 - Contractor Records Retention, data is retained for the life of the contract plus three (3) years.		
PIA - 24:	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response	Physical controls are managed at Acquia, an approved Cloud Service Provider (CSP) under the Federal Risk and Authorization Program		

		(FedRAMP). Multiple technical controls are in place, including password requirements to ensure only appropriate users have access to the system, role-based access to ensure authorized users are granted access to data and activities commensurate with their work, and mulit-factor requirements for those with elevated access to protect against unauthorized code-level changes. Administratively, policies and procedures provide appropriate oversight, including Account Management, Change Management and Vulnerability Management.
PIA - 25:	Describe the purpose of the web site, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response	Response will be provided upon future PIA review
PIA - 26:	Does the website have a posted privacy notice?	Yes
PIA - 27:	Does the website use web measurement and customization technology?	No
PIA - 28:	Does the website have any information or pages directed at children under the age of thirteen?	No
PIA - 29:	Does the website contain links to non-federal government websites external to HHS?	No