

Status: Final

Form Date: 26-JUN-14

Question 1: OPDIV

Question 1 Answer: ACF

Question 2: PIA Unique Identifier (UID):

Question 2 Answer: P-7213166-094842

Question 2A: Name:

Question 2A Answer: Grants Administration Tracking & Evaluation System

Question 3: Which of the following objects does this PIA Cover?

Question 3 Answer: Major Application

Question 3A: Identify the Enterprise Life-Cycle Phase of the System:

Question 3A Answer: Operations and Maintenance

Question 3B: Is this a FISMA Reportable System?

Question 3B Answer: Yes

Question 4: Does the system include a publicly available Web interface?

Question 4 Answer: No

Question 5: Identify the operator

Question 5 Answer: Agency

Question 7: Is this a new or existing system

Question 7 Answer: Existing

Question 8: Does the system have Security Authorization (SA)?

Question 8 Answer: Yes

Question 8A: Date of Security Authorization

Question 8A Answer: 15-AUG-11

Question 9 : Indicate the following reason(s) for updating this PIA.

Choose from the following options.

PIA Validation (PIA Refresh/Annual Review): Checked

Alteration in Character of Data: Checked

Question 10: Describe in further detail any changes to the system that have occurred since the last PIA.

Question 10 Answer: N/A

Question 11: Describe the purpose of the system.

Question 11 Answer: GATES provides automated support for Federal grant decision-making and accountability. GATES supports the application, review, approval, and award of assistance grants in a decentralized environment. The core business processes of the system involve:

- Formula/Block Grant Processing - awards and grantee information maintenance
- Entitlement Processing
- Funds Control - grant commitments and non-grant expenditures
- Grant Oversight - post-award reporting, and maintenance of grant information

Question 12: Describe the type of information the system will collect, maintain (store), or share. (Subsequent questions will identify if this information is PII and ask about the specific data elements.)

Question 12 Answer: GATES contains proprietary business information and other financial information and is used to allow agencies to oversee grants that fund a range of services across the country. Telephone, address and e-mail addresses are work numbers, not home or personal and are publicly accessible elsewhere on government sites.

Question 13: Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

Question 13 Answer: Functionally, GATES is used by grants officers and specialists to manage their grant programs and process grant applications from receipt through award. Financial information is exchanged electronically with the Unified Financial Management System (UFMS) accounting system with an Interconnection Security Agreements (ISA) in place. The GATES system is a core service of the Administration for Children and Families (ACF). GATES provides a comprehensive electronic Grants processing system which facilitates ACF's end-to-end grant making functions from application receipt through grant closeout.

Question 14: Does the system collect, maintain, use, or share PII?

Question 14 Answer: Yes

Question 15 : Indicate the type of PII that the system will collect or maintain.

Name: Checked True

Mailing Address: Checked True

Phone Numbers: Checked True

Taxpayer ID: Checked True

Question 16 : Q6

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

Employees: Checked True

Public Citizens: Checked True

Business Partner/Contacts (Federal/state/local agencies): Checked True

Vendor/Suppliers/Contractors: Not Checked

Patients: Not Checked

Question 17: How many individuals' PII is in the system?

Question 17 Answer: 10,000-49,999

Question 18: For what purpose is PII used?

Question 18 Answer: The PII data that will be captured in the system relates to the organization that has applied for a grant, and to manage organization staff responsible for managing the grant on the grantee side. HHS however, does not retrieve any of the information by an individual's name or other personal identifier.

Question 19: Describe secondary uses for which PII will be used (e.g. testing, training or research)

Question 19 Answer: No secondary uses.

Question 20: Describe the function of the SSN.

Question 20 Answer: N/A: No SSN is collected.

Question 20A: Describe the function of the SSN.

Question 20A Answer: N/A: No SSN is collected.

Question 21: Describe secondary uses for which PII will be used (e.g. testing, training or research)

Question 21 Answer: The OMB grant policies (contained in Title 2 of the Code of Federal Regulations, 2 CFR)

govern administrative requirements for Federal grant-making. The individual laws that create each grant program are the legal authorities for additional information collection and use; each listing in the Catalog of Federal Domestic Assistance (CFDA) contains the special legal authority.

Question 22: Describe secondary uses for which PII will be used (e.g. testing, training or research)

Question 22 Answer: No

Question 23A: Identify the OMB information collection approval

number and expiration date

Question 23A Answer: OMB transferred ownership of the SF-424 forms from itself to Grants.gov (in 2003), so the PRA renewal process is now done by Grants.gov on behalf of all Federal grant-making agencies. [SF-424, SF-424A, etc. are the basis for GATES data associated with ea

Question 23 : Identify the sources of PII in the system.

Hard Copy: Mail/Fax: Checked True

Online: Checked True

Government Sources

Within the OPDIV: Checked True

Other HHS OPDIV: Checked True

State/Local/Tribal: Checked True

Other Federal Entities: Checked True

Non-Government Sources

Members of the Public: Checked True

Private Sector: Checked True

Question 24: Is the PII shared with other organizations?

Question 24 Answer: Yes

Question 24A : Identify with whom the PII is shared or disclosed and for what purpose.

Identify with whom the PII is shared or disclosed and for what prupose.

Within HHS: Checked True

Identify with whom the PII is shared or disclosed and for what prupose.

Within HHS: Other HHS OpDivs/StaffDivs that use GATES for agency specific grants. Agencies may only view/share/disclose their own data. HHS data is not viewed/shared/disclosed outside of HHS.

OtherFed: Checked True

OtherFed: Other Federal Agencies that use GATES for agency specific grants. Agencies may only view/share/disclose their own data. Other agency data is not viewed/shared/disclosed outside of the agency.

Question 24B: Describe any agreements in place that autorizes the information sharing.

Question 24B Answer: Information Sharing Agreements (ISA)/ Memorandum of Understandings (MOU) or Interconnection Security Agreements (ISA) are in place with agencies that use system to system interfaces.

Question 24C: Describe any agreements in place that autorizes the information sharing.

Question 24C Answer: N/A

Question 25: Describe the process in place to notify individuals that their personal information will be collected.

If no prior notice is given, explain the reason.

Question 25 Answer: Users are notified that they must verify that they are able to obtain a user name and password and that the registration process helps to ensure that someone really is who he/she claims to be. They are also informed that the registration information is only collected to ensure that users have a legitimate purpose for using the site.

Question 26: Is the submission of PII by individuals voluntary or mandatory?

Question 26 Answer: Voluntary

Question 27: Describe the method for individuals to opt-out of collection or use of their PII.

If there is no option to object to the information collection, provide a reason.

Question 27 Answer: The entire grants management process, including the collection of PII when and if necessary, is entirely voluntary. Users are notified that they must verify that they are able to obtain a user name and password and the registration process helps to ensure that someone really is who he/she claims to be. Users are also notified that registration is also necessary because applications cannot be submitted anonymously.

The registration information is not disclosed or shared with any other systems and only individual users can edit or view their personal contact information. The application package forms indicate to users when PII requested in the application packages is required and how it will be used.

Question 28: Describe the process to notify and maintain consent from the individuals whose PII is in the system.

Question 28 Answer: The project management office (PMO) and Communications/Helpdesk Office communicates to users whenever any system changes are made as part of the change management process.

If an individual modifies their registration data none of those changes are communicated to anybody other than the user that changed their information (via e-mail notification directly to the user).

Question 29: 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 no.

Question 29 Answer: Users can contact the GATES help desk to submit concerns.

Question 30: Describe the process in place for periodic reviews of PII contained in the system to ensure the data's

integrity, availability, accuracy and relevancy. If no processes are in place, explain why not.

Question 30 Answer: The only PII stored in the system is publicly available agency specific information such as: name, phone number and e-mail address that a user provided during the registration process, or collected via government-wide standard application forms submitted by applicants. Users are responsible for ensuring that their registration information is accurate. Furthermore, an individual (or agency) can access their own records only, not those of other users.

Question 31 : Identify who will have access to the PII in the system and the reason why they require access. Identify who will have access to the PII in the system and the reason why they require access.

User Check Box: Checked True

User Reason: Agency representatives may have a need to view registered users for a particular organization.

Organization users may have a need to view all registered users for their organization. These users are responsible for approving all new user registrations.

Administrators Check Box: Checked True

Administrator Reason: For maintenance of the system, such as updating the user name/password repository (LDAP - lightweight directory access protocol.)

Developers Check Box: Checked True

Developers Reason: For implementing code changes when new functionality is added to the system.

Contractors Check Box: Checked True

Contractors Reason: System administration and Help desk users may have a need to view user information if a user submits a support request or contacts the help desk via phone.

Question 32: Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII

Question 32 Answer: There is a monthly review process for the list of system administrators, application

administrators and critical roles that have access to PII in order to determine if they still need access.

Question 33: 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.

Question 33 Answer: Role based access ensures that the levels of access are restricted to job function. Privileges are assigned on a need to know basis and follows the principles of "least privilege" - users are assigned only the necessary application access required to perform their duties.

Question 34: 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.

Question 34 Answer: All resources are required to complete Information Systems Security Awareness and Privacy Awareness Training annually.

Question 35: Describe training system users receive (above and beyond general security and privacy awareness training).

Question 35 Answer: All resources are required to complete Information Systems Security Awareness and Privacy Awareness Training annually.

Question 36: Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices.

Question 36 Answer: Yes

Question 37: Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific records retention schedules.

Question 37 Answer: The GATES National Archives and Records Administration (NARA) records disposition schedule on file with HHS.

Question 38: Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Question 38 Answer: The GATES personnel (staff and contractors), systems and processes comply with NIST 800-53 controls for a Moderate Application which include administrative, technical and operational controls.

Administrative Controls, - including, but not limited to:

- System Security Plan (SSP)
- File backup
- User manuals
- Security Awareness and Training
- Contractor Agreements
- Least Privilege Access
- PII Policies

Technical Controls

- User Identification and Authorization
- Passwords
- Firewalls
- Encryption
- Intrusion Detection System (IDS)
- Public Key Infrastructure
- PIV cards

Question 39: Identify the publicly-available URL:

Question 39 Answer: <https://www.grantsolutions.gov/gs/>