

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/26/2014

OPDIV:

ACF

Name:

Grants Administration Tracking & Evaluation System

PIA Unique Identifier:

P-7213166-094842

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?

No

Identify the operator.

Agency

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

Conversion

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

N/A

Describe the purpose of the system.

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

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

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.

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

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.

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

Yes

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

Name

Mailing Address

Phone Numbers

Taxpayer ID

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

Employees

Public Citizens

Business Partner/Contacts (Federal/state/local agencies)

How many individuals' PII is in the system?

10,000-49,999

For what primary purpose is the PII used?

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.

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

No secondary uses.

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

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.

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.**Directly from an individual about whom the information pertains**

Hardcopy

Online

Government Sources

Within OpDiv

Other HHS OpDiv

State/Local/Tribal

Other Federal Entities

Non-Governmental Sources

Public

Private Sector

Identify the OMB information collection approval number and expiration date

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

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.**Within HHS**

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

Other Federal Agencies

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

Describe any agreements in place that authorizes the information sharing or disclosure.

Information Sharing Agreements (ISA)/ Memorandum of Understandings (MOU) or

Interconnection Security Agreements (ISA) are in place with agencies that use system to system interfaces.

Describe the procedures for accounting for disclosures.

N/A

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 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.

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 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.

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

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).

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 can contact the GATES help desk to submit concerns.

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

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.

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

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:

For maintenance of the system, such as updating the username/password repository (LDAP - lightweight directory access protocol.)

Developers:

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

Contractors:

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.

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

There is a monthly review process for the list of system administrators, application administrators and describe the roles that have access to PII in order to determine if they still need access.

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.

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.

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 resources are required to complete Information Systems Security Awareness and Privacy Awareness Training annually.

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

All resources are required to complete Information Systems Security Awareness and Privacy Awareness Training annually.

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 GATES National Archives and Records Administration (NARA) records disposition schedule on file with HHS.

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

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