

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/03/2016

OPDIV:

OS

Name:

Cost Allocation Management Information System

PIA Unique Identifier:

P-8783704-203854

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?

No

Identify the operator.

Agency

Is this a new or existing system?

Existing

Does the system have Security Authorization (SA)?

No

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.

None

Describe the purpose of the system.

The Cost Allocation Management Information System (CAMIS) was developed as a tool to assist Cost Allocation Services (CAS) in performing their daily routines as they proceed through the grants' rate agreement process. The grant's and rate agreement process is a series of events that leads to a final rate agreement. The various components of the process include peer reviews, costing analyses, determinations for reimbursement rates of indirect costs and negotiations towards a final rate which will eventually be documented and/or memorialized into a final agreement. CAS's primary function is to negotiate and issue indirect cost rate agreements for organizations that receive Federal grant awards from the US Department of Health & Human Services (HHS). A profile containing the contact information is created and maintained in CAMIS for each of these organizations. CAMIS also maintains a user account for each staff member of CAS.

The negotiation and rate agreement process begins when an organization submits a proposal. When this occurs, an assignment record is created in CAMIS to track each aspect of the negotiation/rate agreement process. Once this process is complete, a rate agreement is created in CAMIS that contains the indirect rate data and all supporting and pertinent information.

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

The system collects and maintains information about grantee organizations (not individuals) consisting of: organization name, organization address, organization fax number, Federal Employer Identification Numbers (EINs), organization POC names, titles, phone numbers and email addresses. CAMIS also maintains a user account for each staff member of CAS which contains the user's name, title and email address. Assignment records are created and maintain each time a proposal from a grantee is received which contains the received date and completion date information plus the CAS staff member assigned to the assignment. CAMIS also maintains cost avoidance and cash refund information that may be associated with an individual assignment. CAMIS also collects staff time which each CAS staff member enters on a monthly basis detailing the hours spent on each assignment and non-direct activities like training, supervision, admin and leave. And once an assignment is completed, a rate agreement is usually created in CAMIS which contains the grantee name and address, the negotiated rate data and associated base definitions.

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

CAMIS is an internal system used by Cost Allocation Services for performing organization identification, cost avoidance calculations, time and effort determination, and the issuance and control of correspondence during the process of distributing grants to government institutions such as colleges and universities, hospitals, non-profits, and local and state government. CAS works directly with organizations wishing to obtain an indirect cost rate from HHS. This is done via the issuance of an indirect cost rate agreement between HHS/CAS and the organization. CAS collects the name, address and EIN from these organization and stores the information in CAMIS in order to properly and officially identify the organization. And since CAS staff members need to work and communicate directly with these organizations in order to negotiate the indirect cost rate, the organizations' fax number, phone number and POC name, title and email address are all collected and stored in CAMIS. User information is collected to identify users and restrict/control access and permissions.

Assignment records are maintained to identify workload and oversee completion timeliness. Cost avoidance and cash refund information is collected for reporting purposes to upper management as a performance measure. Staff time information is collected for monthly billing/invoices purposes. Rate information is collected in order to produce the official rate agreement which provides the grantee organizations with an indirect cost rate to be used with their Federal grant awards.

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

Yes

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

Name

E-Mail Address

Mailing Address

Phone Numbers

Fax Number

EIN

Title

Organization name

User name, title and email address

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

Employees

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

How many individuals' PII is in the system?

5,000-9,999

For what primary purpose is the PII used?

Every employee of CAS is provided a CAMIS user account so that they can access and use the system. Most users use the system primarily to just enter staff time and create rate agreements. Others, like managers and administrators, use it to enter data and generate reports. To setup a user account, a registration form needed to be completed. First name, last name, title and email address can be included, but this information is not required. For each grantee organization CAS works with, an organization profile is created which includes the organization name, address, and point-of-contact information which includes the person's name, title, phone number, fax number and email address. If provided, the organization's EIN is included, as well, but it's not required. The primary purpose of this information is to provide CAS staff members the ability to contact and communicate with the organizations and to identify the organizations on rate agreements.

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

Not Applicable

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

Information is collected as authorized by Office of Management and Budget (OMB) Circulars A-102 ("Grants and Cooperative Agreements with State and Local Governments," Section 1(c) "Standard Forms for Applying for Grants and Cooperative Agreements,") and A-110 (Subpart A, "Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations," Section 12, "Forms for Applying for Federal Assistance"). HHS's implementation of these Circulars is documented in its "HHS Grants Policy Statement" (January 1, 2007), available at <http://www.hhs.gov/asfr/ogapa/grantinformation/hhsgps107.pdf>. These Circulars contain further information as to authorizing statutes such as the Federal Grant and Cooperative Agreement Act of 1977 (31 USC 6301), the Federal Financial Assistance Management Improvement Act of 1999 (31 USC 6101), and other laws as set out in the "Authority" sections of those Circulars.

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

Email

Government Sources

Within OpDiv

State/Local/Tribal

Non-Governmental Sources

Public

Private Sector

Identify the OMB information collection approval number and expiration date

SF 425 Establishment of Grant Award - OMB Approval Number: 0348-0061, expiration date: 02/28/15.

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.

Information is collected directly from grantee, and is necessary for business operation and is provided by the grantees to CAS.

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.

Organization information is collected directly from grantees via proposal submissions (which is voluntary), and is necessary for business operation/transactions. Information pertaining to specific individuals is not required and individuals can opt-out by not providing their PII as part of their user credential. Users may submit an email address and user name without PII. To establish a CAMIS user account, the registration form needs to be completed, but the individual is not required to enter any of their PII.

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

The information in CAMIS is used transactional and future direct notification is unlikely to be necessary. If this were to occur individuals could be contacted via the contact information in the system.

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.

CAS and CAS management contact information is available on the CAS website and on our rate agreements. Any individual with a concern could contact our organization and would be immediately connected with CAS management. The concern would be reviewed and investigated, and appropriate action would then be taken.

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

There is a formal data review process referred to internally as "CAMIS tracking." For CAMIS tracking, the HHS/CAS branch chief and negotiator each review data entered into CAMIS for accuracy, comparing the data against contractual documents and other external materials. If these supervisory review procedures expose errors, the reviewer creates action plan and oversees its implementation.

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

Users:

To enter staff time and create rate agreements

Administrators:

To enter grantee organization, assignment record, cost avoidance and cash refund information

Developers:

(same as direct contractors below) to make enhancements to the system

Contractors:

To maintain the system as part of a maintenance agreement. Direct contractors' user credentials will not be stored in the system.

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

All system users are Federal employees with CAS. When an individual becomes a CAS employee, a CAMIS user account is created which provides them access to the PII contained in the system. Access to the PII is necessary for CAS employees to perform their job duties.

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.

Permissions for each CAMIS user account can be and are set/controlled by the CAMIS administrator. These permissions control access to PII and system functions and only the minimum amount of access necessary to perform the user's job is granted.

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 CAS employees are required to complete the HHS Privacy Awareness and Information Systems Security Awareness training.

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

All new CAS employees are provided CAMIS training by either a CAS office assistant or supervisor.

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.

NARA retention schedule N1-468-04-002. Destroy 5 years after obsolete. Destroy rate agreements after 20 years.

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

Server is located in Parklawn Data Center in Rockville and inherits all the physical and environmental controls provided by the Building. This Federal government building is secured by armed guards and requires ID badges for entry. The server is maintained and supported by HHS ITIO and is within the HHS network environment (firewall). CAMIS is an internal system and only HHS/CAS employees are provided access. A user account and password are required to access information on system. Each user is assigned permissions and only approved users have the ability to modify (write, edit, delete) PII.