

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

05/20/2016

OPDIV:

OS

Name:

Grants.gov

PIA Unique Identifier:

P-7428681-798208

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?

Yes

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

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

The change that has occurred since the last PIA review is the implementation of LifeRay Portal, which is a web-based platform that allows users to find content that is relevant with ease and simplicity. Although this implementation resulted in a change to the look and feel of Grants.gov, no other changes were made to the way Personally Identifiable Information (PII) is collected, stored, transmitted or shared.

Describe the purpose of the system.

Grants.gov is managed by the Department of Health and Human Services (HHS). Grants.gov is an E-Government initiative operating under the governance of the Office of Management and Budget (OMB). Under the President's Management Agenda, the office was chartered to deliver a system that provides a centralized location for grant seekers to find and apply for federal funding.

Grants.gov has deployed two government-wide grant functions: FIND and APPLY.

The FIND feature allows Federal agencies to post funding opportunities on Grants.gov where potential applicants can search for and view grant opportunities. Grants.gov system houses information on over 1,000 grants for 26 federal grant making agencies. Due to the sheer number and diversity of the grants they cannot be listed. However, examples of the type of information provided for each grant is as follows:

Funding opportunity number and title, posted, created, and close dates, estimated total program funding etc. To view more details on the type and kind of grants being offered refer to www.Grants.gov. No authentication or login is required to access and use this feature.

The APPLY option allows agencies to post their grant application packages on Grants.gov, where applicants can download the packages, complete them offline, and submit them online through Grants.gov. In order to post funding opportunities or apply for grants (as an individual or as an organization), users are required to register with the site.

When registering as an individual it means the applicant is submitting the grant applications on their own behalf, not representing an organization, institution, or government. To do so registration information is required to create a Grants.gov account, such as: email; phone number; address; secret question/answer; user name and password. Users create their own secret questions and answers, there is no preset list.

When registering as an Organization it means the applicant will contribute to or submit an application on behalf of the group, such as a state government, nonprofit organization, or a private business. To do so registration information is required, such as: email; user name; phone number; secret question/answer; password; and DUNS Number, A DUNS Number is a unique nine-character identification number provided by the commercial company Dun & Bradstreet (D&B).

Users must also be registered with the System for Award Management (SAM) that is a government-wide registry for vendors doing business with the Federal government. SAM is a system maintained and operated by the General Services Administration (GSA).

When registering as a grantor (Federal agencies who need to perform grant-making functions (i.e. posting and managing funding opportunities) on behalf of the agency, account registration information is required, such as: point of name; Job title; agency; phone number; email; secret question/answer; agency code; user name and password.

Additionally, Grants.gov provides a system-to-system (S2S) web service interface that allows organizations to submit grant applications directly from their systems into Grants.gov. User credentials are required (e.g. user ID; password; email; name).

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

The FIND function provides information on available grants for each agency.

The APPLY function requires users to include individuals and organizations to register with the site. Grant applications can contain user's information such as, name, address, telephone number, job title, project description, area affected by project, DUNS number, and other grant information that is requested by the grantor. This information cannot be listed because it varies depending on what grants are being offered and applied for.

User registration information for individuals who serve as points of contact (POC) for grantor agencies and grantees is also included, regardless of whether the grantee is an entity or an individual.

Submission of the requested information (registration and grant information) is voluntary.

Contact information may be personal or professional/institutional, at the individual's discretion. Social Security Number (SSN), Financial Account Info, Taxpayer Identification, etc. are collected for a small subset of applications. These PII items are only collected for application packages where the grantor agency has requested it. All forms used in the application packages are OMB approved forms.

Contact information, such as name, email address and phone number, is also collected for user credentials for contractors, system users and database administrators.

Users of the website are randomly selected to complete Foresee surveys soliciting their feedback on elements of the website. The Foresee survey asks users to rate different aspects of the site like system performance, look and feel, functionality, navigation etc. This allows the program to gauge user satisfaction with the website. Users can opt out of completing the surveys. If they do complete the surveys, all responses are anonymous and no PII is collected or maintained in the system.

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

The system provides a centralized location for grant seekers and grantors to find, apply and present funding opportunities. It includes implementation of the LifeRay Portal, which is a web-based platform that allows users to find content that is relevant with ease and simplicity.

The FIND function provides information on available grants for each agency.

The APPLY function requires users to include individuals and organizations to register with the site. Grant applications can contain user's information, such as name, address, telephone number, job title, project description, area affected by project, DUNS number, and other grant information that is requested by the grantor. This information cannot be listed because it varies depending on what grants are being offered and applied for.

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Effective October 17, 2015, data is purged after three years.

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

Yes

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

Social Security Number

Name

E-Mail Address

Mailing Address

Phone Numbers

Financial Accounts Info

Education Records

Taxpayer ID

User login and password

Job title

Job title

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

Employees

Public Citizens

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

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

100,000-999,999

For what primary purpose is the PII used?

PII is collected for application packages where the grantor agency requests it. Also, POC user information, names, emails, telephone numbers, secret questions and answers, user name/identification, and password are used when registering for Grants.gov. Lastly PII is used for credentialing purposes to allow contractors, database and administrators access to the system.

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

Not Applicable (N/A)

Describe the function of the SSN.

There are two forms where SSN may potentially be provided.

The first form is titled "Automated Clearing House (ACH) Vendor/Miscellaneous Payment Enrollment Form." The OMB form number is 1510-0056. This form is not included in every application. It is only included when Department of Treasury requests it. From July 2013 through October 2013, this form was required in two opportunities a week. A very small subset of opportunities contain this form, so it is important to note that SSN is not collected on every grant opportunity. Also, SSN would not be provided in every case on this form. The form requests SSN or Taxpayer Identification #. The SSN is only likely to be provided when the grant or a portion of the grant is awarded to an individual (less than 1% of all opportunities) and not an institution. This form is used for ACH payments with an addendum record that contains payment-related information processed through the Vendor Express Program. All information collected on this form is required under the provisions of 31 U.S.C. 3322 and 31 Code of Federal Regulation (CFR) 210. This information will be used by the Treasury Department to transmit payment data by electronic means to a vendor's financial institution. It is important to note that Grants.gov is NOT a financial system and no payments are processed through Grants.gov. Information on this form is collected at the grantor agency's request, downloaded and retrieved by the grantor agency. Submission of the requested information is required when this form is included in an application package.

The second form is titled "Housing and Urban Development (HUD) Applicant/Recipient Disclosure/Update Report." The OMB form number is 2510-0011. This form is not included in every application.

It is only included for HUD related opportunities where HUD includes it in the application package. From July 2013 through October 2013, this form was required in seven opportunities a week. A very small subset of opportunities contain this form, so it is important to note that SSN is not collected on every grant opportunity. HUD is authorized to collect this information under the Housing and Community Development Act of 1987 42 U.S.C.3543 (a). Submission of SSNs and employer identification number (EINs) is optional when this form is included in an application package.

SSN is not used by Grants.gov or HHS. It is only collected in applications where the grant making agency requests it.

Effective October 17, 2015, data is purged after three years.

Cite the legal authority to use the SSN.

Data is collected using OMB approved forms: 1510-0056 and 2510-0011. All information collected on the ACH Vendor/Miscellaneous Payment Enrollment Form is required under the provisions of 31 U.S.C. 3322 and 31 CFR 210. HUD is authorized to collect this information under the Housing and Community Development Act of 1987 42 U.S.C.3543 (a).

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

Grants.gov is mandated by the 2002 President's Management Agenda and Public Law 106-107. On November 20, 1999, the President signed Public Law 106-107, the Federal Financial Assistance Management Improvement Act. The purposes of this law are to: improve the effectiveness and performance of Federal grant programs; simplify grant application and reporting requirements; improve the delivery of services to the public; and facilitate greater coordination among those responsible for delivering such services.

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

No

N/A

Identify the sources of PII in the system.

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

There are >100 forms. Each form is reviewed and approved by OMB. The form number and expiration date for each form can be found on the Grants.gov website at the following Uniform Resources Locators (URLs):

<http://www.grants.gov/web/grants/forms/r-r-family.html#sortby=1>

<http://www.grants.gov/web/grants/forms/sf-424-family.html#sortby=1>

<http://www.grants.gov/web/grants/forms/sf-424-individual-family.html#sortby=1>

<http://www.grants.gov/web/grants/forms/sf-424-mandatory-family.html#sortby=1>

<http://www.grants.gov/web/grants/forms/sf-424-short-organization-family.html#sortby=1>

Is the PII shared with other organizations?

Yes

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

Applications are shared/made available to the applicable grant-offering-agency within HHS.

Other Federal Agencies

Applications are shared/made available to the applicable grant-offering-agency.

Private Sector

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

A grantor Interconnection Security Agreement (ISA) and Memorandum of Understanding (MOU) is in place with agencies that use the S2S interface to retrieve completed applications.

The purpose of the ISA/MOU is to establish a management and interconnection agreement regarding the establishment, management, operation, and security of a connection between Grants.gov and the Agency system.

Describe the procedures for accounting for disclosures.

Disclosures from this system are unlikely to be made, except in furtherance of the primary purpose of the system. If any nonstandard disclosures were to be made for any unanticipated reason, the system owner would maintain a record of the disclosures with the required data elements such as date of the disclosure and recipient of the disclosure to include mailing address, content of the disclosure, and purpose of the disclosure.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Individuals are notified during the registration process that their PII will be collected. Additionally, the application package notifies users if and how their PII will be used.

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.

Users are notified that they must verify that they are able to obtain a user name and password. The registration process also helps to verify the user's true identity. Users are notified that registration is 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.

If users do not want their PII used, they can choose not to complete the registration process. There is no opt-out option once a person's PII is already in the system.

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

No major changes that would affect data subject's rights or interests are anticipated, but such changes could be reported using the contact information contained 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.

Users can contact the Grants.gov contact center to submit a complaint. The contact center can be contacted by phone or email (contact information is provided on the website). If necessary, the contact center will escalate the issue to the Grants.gov Program Management Office (PMO) for further consideration, investigation and resolution.

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 Grants.gov personnel (staff and contractors), systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate Application which include administrative, technical and physical controls. These controls are in place to ensure integrity, availability, accuracy and relevancy of the data. In order to limit access to the data, reviews are conducted by Grants.gov personnel only when requested.

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 eBiz (primary contact) 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 Lightweight Directory Access Protocol (LDAP) maintenance etc.

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.

The program regularly completes a review (every 60 days) of the list of administrators and developers that have access to PII to determine if they still need access. As a result of these reviews, the number of resources with access to PII has been reduced. Access is now limited to 4 members of the Operations and Maintenance (O&M) team. These resources still require access as they provide Tier 2 and Tier 3 help desk support to users. Access privileges are removed immediately when personnel changes occur.

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.

A system of access levels is implemented. Privileges are assigned on a need to know basis.

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 personnel 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).

None.

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.

Grants.gov current policy is to purge application packages from the system after three years of receipt from the applicant. The records retention schedule is N1-468-04-1.

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

The Grants.gov personnel (staff and contractors), systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate Application which include administrative, technical and physical controls.

Administrative Controls:

- System security plan
- File backup
- User manuals
- Security Awareness and Training
- Contractor Agreements
- Least Privilege Access
- PII Policies

Technical Controls

- AutoCAD
- User Identification
- Passwords
- Firewall
- Encryption
- Intrusion Detection System (IDS)
- Public Key Infrastructure

Physical Controls

- Guards
- Identification Badges
- Key Cards

Cipher Locks
Biometrics
Closed Circuit TV

Identify the publicly-available URL:

<http://www.grants.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.

Session Cookies that do not collect PII.

Does the website have any information or pages directed at children under 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