

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

09/08/2021

OPDIV:

ACF

Name:

Federal Case Registry

PIA Unique Identifier:

P-5512903-066165

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

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

No major system changes have occurred since the last finalized PIA submission; this is a PIA renewal

Describe the purpose of the system.

The Federal Case Registry (FCR) contains state Child Support Enforcement (IV-D) and non IV-D case data and serves as a pointer system to help locate persons across state lines from all 50 states and 4 territories. It accepts child support case updates (includes new case/participant, change, delete) and locate request via Social Security Administration (SSA) approved file transfer method. Person data in the FCR is matched daily against employment data in the National Directory of New Hires (NDNH) sent to states to facilitate case processing and increase collections. Additionally, matches are sent to states to inform them if a IV-D case participant in their state appears as a participant in a IV-D or non IV-D case in another state. The FCR also serves as the conduit for matching against the following sources: Department of Defense (DOD), Veteran Affairs(VA), Federal

Bureau of Investigations(FBI), Internal Revenue Service(IRS), National Security Administration(NSA) and SSA. Matches made through the Multistate Financial Institution Data Match (MSFIDM) and the Insurance Match are returned to states through the FCR.

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

As required by federal law, each state child support enforcement (CSE) agency maintains a State Case Registry (SCR). The records in the SCR include information pertaining to all child support cases and orders established or modified in the state on or after October 1, 1998. The FCR includes abstracts of this information, provided by each CSE agency. There is no direct user access to the FCR; individuals accessing the FCR have to log into the Federal Parent Locator Service (FPLS) Enterprise Service Portal (ESP). The FPLS ESP is covered under a separate PIA. The FCR system of records contains the following PII and other sensitive information: names (including alternative names and mother maiden names), social security numbers (SSN) - including alternative numbers, birth dates, participant type (custodial party, noncustodial parent, putative father, child), military status, sex, case type (IV-D, referring to a case in which the family is receiving services from the CSE agency, or non-IV-D agency), indication of an order, family violence indicator (domestic violence or child abuse), state Federal Information Processing Standard (FIPS) code, county code, state case identification number, and state member identification number.

Information maintained in the FCR is matched against information maintained in the NDNH, another component of the FPLS, to determine if a newly hired employee included in the NDNH is a participant in a child support case anywhere in the country. Within two business days after a comparison reveals a match with respect to an individual, the information regarding the individuals current employment and address is reported back to the State agency or agencies responsible for the case. States are also alerted when another state has registered the same individual on the FCR. The data collected is mandatory. Federal law requires the collection of information for child support. The FCR also functions as the interface with external locate source to assist in the location of a participant in a child support cases. Audit information is retained for each response received includes: the Requesting State Code, SSN, person name, requested agency code, Case ID, and person participant type. In addition, elements are retained to assist in the filtering of duplicate response. The filter duplicate elements vary based on the agency responding. The Locate Source Response Agency Code identifies the agency providing the person information. The filter duplicate audit information retained includes the following data elements, if provided by the responding agency: SSN, Date of Birth, Street Address, City/State/ZIP Code, Department of Defense Codes and Pay, Grade/Rank, Veterans Affairs Information, IRS Tax Year, SSA Employment Information, Death Information, Prison/Confinement Information, Unemployment Insurance (UI) Information, New Hire Information, Quarterly Wage Amount, New Hire Reporting Quarter, Federal Employer Identification Number (FEIN).

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

The FCR is a national database that includes all child support cases handled by state IV-D child support agencies (referred to as IV-D cases), and all support orders established or modified on or after October 1, 1998 (referred to as non IV-D orders). It assists states in locating parties that live in different states to establish, modify, or enforce child support obligations, establish paternity, enforce state law regarding parental kidnapping, and establish or enforce child custody or visitation determinations. The following PII information is collected and stored in the system: names (including alternative names and mother maiden names), SSNs (including alternative numbers), birth dates, participant type (custodial party, noncustodial parent, putative father, child), mailing address, military status, sex, case type (IV-D, referring to a case in which the family is receiving services from the CSE agency, or non-IV-D case), indication of an order, family violence indicator (domestic violence or child abuse), state FIPS code, county code, state case identification number, mother's maiden name, military status, and state member identification number.

The non-identifiable information is collected and stored in the system includes statistical information regarding the number of transactions processed for each state (by submission date and batch), the

number of responses sent to the state by type, the number of locate request processed by federal agency and the number of employment pro-actively sent to the states.

The state agency records for the child support case data remains on the FCR until notification is received from the states via a batch transaction that the case is closed or a person is no longer associated with a case. Records pertaining to closed cases are archived on a fiscal year basis and retained for two (2) more years. The results of FCR-to-FCR proactive matching and matching with the NDNH are maintained 60 days and then destroyed. The match results for locate requests submitted by or in behalf the state child support agencies are retained 60 days after receipt. Audit trail records of locate request responses are retained for two (2) fiscal years and then destroyed. Locate audit records are archived once a year based on the fiscal year. The archived records are retained for two (2) complete fiscal years. Locate data retained to support the filtering of duplicate responses for the National Directory of New Hire is retained one (1) year. Locate data retained to support the filtering of duplicate responses for other federal agencies is retained up to three (3) years.

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

Yes

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

Other: A copy of the original data for all types of PII/PHI that exist in consuming LoBs (Line of

Sex

Case Type (IV-D or non-IV-D)

Family Violence indicator (domestic or child abuse)

State American National Standards Institute (ANSI) code, state ANSI county code, state case identification number, state member identification number

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

How many individuals' PII is in the system?

1,000,000 or more

For what primary purpose is the PII used?

The PII collected in the FCR is used in the following ways: PII is used by State CSE Agencies to provide locate information, establish paternity, and to establish, set, modify or enforce child support obligations. PII is used by the IRS to match the FCR data file against profiled IRS tax records of payers claiming Earned Income Tax Credit (EITC) on dependents. Federal law authorizes that specified types of collected information may be shared with specified entities for specified purposes. In summary, the collected information is shared with the following entities: State CSE agencies; a court with authority to issue a child support order; a resident parent, legal guardian, attorney, or agent of a child who is not receiving Temporary Assistance for Needy Families (TANF); a State agency administering specified child welfare or foster care programs; an agent or attorney of a state, with an agreement, who has the duty or authority under state law to enforce a child custody or visitation determination; a court having jurisdiction to make or enforce a child custody or visitation determination, and; an agent or attorney of a state or the United States with responsibility for matters involving the unlawful taking or restraint of a child. Specified information may also be shared with the following federal agencies for the authorized purposes specified in federal law: Department of the Treasury and Department of State (DoS).

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

The Secretary of Health and Human Services may also share collected information, without personal identifiers, for research purposes found by the Secretary to be likely to contribute to achieving the purposes of the TANF program or the child support program.

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

42 U.S.C. § 653(a)(2), 42 U.S.C. § 653(b)(1)(A), 42 U.S.C. § 653(c), 42 U.S.C. § 653(e)(1), 42 U.S.C. § 653(h)(3), 42 U.S.C. § 653(j)(1), 42 U.S.C. § 653(j)(2)(B), 42 U.S.C. § 653(j)(3), 42 U.S.C. § 653(j)(5), 42 U.S.C. § 653(l) and (m), 42 U.S.C. § 654(26), 42 U.S.C. § 659a(c)(2), and 42 U.S.C. § 663 (e).

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

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

09-80-0381 February 14, 2018 (83 FR 6591)

09-80-0385 OCSE Federal Case registry of Child Support Orders (FCR) 4/2/2015

Identify the sources of PII in the system.

Identify the OMB information collection approval number and expiration date

0970-0421, expires November 31, 2023

Is the PII shared with other organizations?

Yes

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

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

Earned Income Tax Credit Agreement with IRS

Describe the procedures for accounting for disclosures.

Data is accessed by authorized case workers and disclosures are tracked. Disclosures are only for agreed upon time-frames and purpose. Continuous review of agencies with disclosed information is done annually, and through selective site reviews.

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

The collection of PII for FCR is mandated by federal law, therefore, no prior notice is required/given to individuals upon collection of their PII.

Is the submission of PII by individuals voluntary or mandatory?

Mandatory

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.

Individuals cannot opt-out of the collection of their information because, as required by federal law, the FCR information is collected from each state CSE agency which maintains the information in its SCR. Information contained in the FCR is not directly collected from individuals and is maintained for the routine uses specified in the system of records notice pertaining to the FCR.

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

The information collected for the FCR comes from each state CSE agency. Given this collection, there is no process needed, or currently in place, to notify and obtain consent from individuals who have PII in the FCR prior to implementing major changes to 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.

The FCR SORN includes a section for individuals to send requests or inquiries. All Requests received are handled by the Division of Customer Communications.

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

Data is reviewed annually and reconciled through the Interstate Case Reconciliation (ICR) process annually. ICR on the FCR, helps states to reconcile case information with other states. A supplemental reconciliation to the annual reconciliation is also performed if needed. The reconciliation is performed using input files from the state agencies and the data in the FCR. The reconciliation helps with many aspects of case management, including interstate case pairing, paternity establishment, and establishment and modification of child support orders. This process helps to improve the integrity, accuracy, and relevancy of the system data.

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

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

Role based access controls are in place to ensure that only those with specified roles access information to complete required tasks. All users are specifically authorized by their roles. Administrators are provided access to FCR data sets to support the investigation of issues raised by states, and to evaluate data quality and production problems. Contractor access is given to individuals responsible for providing state agency personnel assistance in the investigation of participants' issues.

State users are authorized by the state agency.

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.

For all roles assigned to individuals with access to the system, the principle of least privilege is applied. Least privilege refers to providing an individual access to the minimum amount of information necessary for that individual to sufficiently complete all of their assigned job 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.

New hire orientation and annual security awareness training is required for all. Training is provided by HHS, ACF, and OCSE.

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

Annual training includes IRS regulations, federal statutes, HHS and ACF regulations, and refresher training. Role based training is also required.

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 retention and destruction process of files is done as outlined in the system of records federal register notice. The process is as follows:

(1) Records provided from State CSE agencies.

(a) Electronic records furnished by the State CSE agency containing child support case and order information (input files) are retained for 60 days and then deleted.

(b) State agency records (as posted to the FCR) remain within the FCR until removed, upon notification by the State agency that the case is closed, provided that, upon request, a sample may be retained for research purposes found by OCSE to be likely to contribute to achieving the purposes of child support programs or the TANF program, but without person identifiers. (c) Records pertaining to closed cases are archived on the fiscal year basis and retained for two (2) years.

Family violence indicators are removed from the individual's record, upon request by the state that initiated the indicator.

(2) Locate requests and match results.

(a) Locate requests submitted by State CSE agencies and other authorized persons are retained for 60 days and are then deleted.

(b) Audit trail records of locate requests and disclosures of match results pursuant to those requests, which include indications of which federal agencies were contacted for locate information, whether information was located, and the type(s) of information returned to the requesting entity, are archived once a year based on the fiscal year. The records are retained for two (2) completed fiscal years and then destroyed.

(c) Records containing information from the NDNH or from other agencies obtained pursuant to locate requests are provided to authorized persons through the FCR. Copies of records provided are then retained within the FCR for the purpose of electronically filtering and suppressing redundant information from being provided. Thereafter, such information is deleted.

(3) Match results generated as a result of FCR-to-FCR comparisons, which locate individuals who are participants in child support cases or orders in more than one State, are transmitted to the relevant States. Copies of FCR-to-FCR match results are retained for 60 days and then deleted.

(4) Any record relating, or potentially relating, to a fraud or abuse investigation or a pending or ongoing legal action including a class action, is retained until conclusion of the investigation or legal action.

(5) Copies of the FCR records transmitted annually to the IRS for the purpose of administering the earned income tax credit (routine use 12) are retained for one (1) year and then deleted.

(6) Records collected or disseminated for technical assistance to CSE agencies or other authorized agencies or entities are retained for 60 days to five (5) years, and audit data is retained for a period of up to two (2) years.

NARA records disposition # N1-292-10-003

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

The information is secured in accordance with a system classified as "moderate" according to FIPS 199. The security controls adhere to the NIST 800-53 requirements, and are followed as specified in

an up-to-date system security plan. All administrative controls, such as planning, awareness and training, and incident response, are all emphasized and continuously evaluated.

Technical Controls, such as Access Controls that ensure that only those with required job roles access information to complete tasks, configuration management, audit and accountability, and Identification and Authentication, are all in place to ensure the security of data, and Intrusion Detection Systems ensure that any anomalies are reported and evaluated.

Physical Controls, such as security guards on facilities, cameras, ID cards, and data center isolation, ensure that only those who are authorized to access any of the facilities can enter them.

All personnel with access to the system undergo thorough background investigations, are required to sign the HHS and OCSE Rules of Behavior, and take a non-disclosure oath upon completing security awareness training as a new hire and then again annually.