

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

04/15/2025

OPDIV:

ACF

Name:

Head Start Enterprise System

PIA Unique Identifier:

P-6033562-810822

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.

Contractor

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.

Not Applicable

Describe the purpose of the system.

The Head Start Enterprise System (HSES) is a cloud-based system hosted on Cloud.gov that is designed to serve as a consolidated and comprehensive repository for reliable data about Office of Head Start (OHS) grantees and program operations.

OHS initiated development of HSES in conjunction with the Administration for Children and Families (ACF) Office of Information Services (OIS). The development and deployment of HSES was designed as a phased approach to provide OHS program managers and grantees with centralized access to management information, while minimizing any disruptions to the operation of HSES legacy applications and databases.

HSES is designed to solve these problems, by providing a single, authoritative repository of up-to-date information about OHS grantees and program operations. HSES facilitates a wide range of management information and business intelligence reporting, including real-time monitoring of grantee performance. For example, HSES allows OHS to actively manage program risks, by the timely identification of potential grantee performance, financial management, or reporting problems.

HSES serves as the operational data store for all grantee and program operations. It is designed to streamline and simplify the integration of existing applications, interfaces, and databases through the provision of a range of flexible and efficient integration mechanisms.

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

The Office of Head Start (OHS) collects grantee director contact and data required to monitor the program performance of the grant. Grantees are asked to keep their contact data up to date to facilitate communication. This contact data includes names, phone numbers, and e-mail addresses. Additionally, grantees report monthly enrollment data and submit the annual Program Information Report (PIR). The HSES data collection activities include: grantee reporting information about their operations and requests funding and support.

The PII information for HSES User credentials is limited to the Users Name, Email Address, and Phone Number.

The Organization contact information in HSES is limited to the Name, Email, and Phone Number of key leadership Contacts (Authorizing Official (AO), Chief Executive Officer (CEO), Chief Financial Officer (CFO), Policy Council Chair (PCC), and Director) and the organization's address. The Contacts and Address information details are usually available on the Grantee's public website as well.

Two subsystems are part of the HSES:PIR and the data collection modules (aka HSES). The PIR portal is used for reporting information in an annual survey that is used to support OHS. PIR provides information from a questionnaire that occurs every year. The Improving Head Start Readiness Act requires grantees to complete a number of reporting activities. The HSES data collection modules are used to collect the reportings. One of the modules in HSES is the PIR survey, which all grantees of Head Start must complete annually.

The PIR data is made available to the public, including researchers, by request. To setup the accounts, users provide names, email address, and phone number. In HSES for data collection and reporting activities, grantees include Head Start and Early Head Start child-serving programs, Collaboration Offices often housed within state agencies, and National Training and Technical Assistance Centers. State collaboration grantee directors are provided with reports from HSES that contain names, email addresses and phone numbers of all state collaboration grantee directors, in order to facilitate collaboration efforts.

All system administrators are contractors who log in to their individual user accounts, which have role-based privileges. To setup the accounts, administrators provide names, email address, and phone number. For example, a member of the database administrator group has privileges to administer the database but not the system or network devices. A network administrator has privileges to administer the network devices, but not the system or database.

Users credentials used to log in with are user ID and password. Our grantees don't use PIV cards. PIV cards are used by Central and Regional Office users only.

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

The Head Start Enterprise System (HSES) supports enterprise functions for the Office of Head Start

and consolidates data across all the Office of Head Start (OHS) business processes. HSES collects grantee director and other grantee employee contact information and data required to monitor the program performance of the grant, to facilitate management of the grant throughout various stages of the federal grant lifecycle, to ensure completion of grant funds planning, and to establish and maintain end user accounts.

Grantees are asked to keep their contact data up to date to facilitate communication. This contact data includes names, phone numbers, e-mail addresses, and grantee organization mailing addresses. OHS program specialists verify the accuracy of the contact and other data when preparing Funding Guidance Letters (FGLs) and other periodic communication.

Additionally, grantees report monthly enrollment data and submit the annual Program Information Report (PIR) and refunding applications through HSES. For PIR, account creation information (name, phone number, email,) is collected to setup accounts for access to the PIR site.

The PIR data is made available to account holders, including researchers, by request, after they provide contact data, limited to name, e-mail address, phone number, in order to establish an account for that purpose. Account holders include Head Start and Early Head Start child-serving programs, National Training and Technical Assistance Centers, and Head Start State Collaboration Offices (HSSCO) within state agencies, HSSCO users are provided with reports from HSES that contain names, email addresses and phone numbers of the HSSCO users. HSSCOs are established entities within OpDiv in accordance with Sec. 642B. [42 U.S.C. 9837b] who use the information to facilitate collaboration with Head Start agencies to promote better linkages between Head Start agencies and other child and family agencies that provide health, mental health, or family services, or other child or family supportive services, such as services provided under section 619 or part C of the Individuals with Disabilities Education Act (20 U.S.C. 1419, 1431 et seq.).

The PII information for HSES User credentials is limited to the Users Name, Email Address, and Phone Number.

User credentials used to log in with are user ID and password. HSES grantee users do not use PIV cards. PIV cards are used by Central and Regional Office users only.

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
User Credentials
Grantee organization mailing address

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?

10,000-49,999

For what primary purpose is the PII used?

The personally identifiable information (PII) in the Head Start Enterprise System (HSES) is used to collect information from grantees for user account setup and administration, which includes the granting of roles and menu/data viewing privileges.

HSES system administrators are Eagle employees and, as with all HSES Users, the PII (Name, Email, Phone) is used for HSES login credentials to authenticate and establish role assignments for access privileges in the system.

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

To assist with planning the Head Start Review by referencing the contact information for employees in the grantee organization who are responsible for different services.

To facilitate the collaboration requirements described in the Head Start Law, 42 U.S. Code § 9837b, by providing the contact information for all state collaboration directors to each collaboration director. These users are grantees of OHS.

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

42 U.S. Code § 9836a - Standards; monitoring of Head Start agencies and programs, Section (b)(4) states:

"Confidentiality

(A) In general

The Secretary, through regulation, shall ensure the confidentiality of any personally identifiable data, information, and records collected or maintained under this subchapter by the Secretary and any Head Start agency."

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

Email

Online

Identify the OMB information collection approval number and expiration date

OMB Control No: 0970-0490, HSCO Annual Report - Expires 03/31/2026

OMB Control No: 0970-0427, Program Information with 1-hour estimated burden - Expires

06/30/2025

OMB Control No. 0970-0207, Head Start Program Grant Application with 33-hour estimated burden - Expires 06/30/2025

OMB Control No. 4040-0006, SF-424A - Expires 03/31/2025

OMB Control No. 4040-0004, SF-424 - Expires 02/29/2028

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.

The personally identifiable information (PII) collected is consistent with the Federal guidance to agencies when establishing user accounts for systems that use e-authentication. Personal information is only collected for the purpose of setting up an account. This account creation screen

contains the rules of behavior (RoB) that is used in ACF sites. Once the account is setup and the user logs into HSES and no additional personal information is collected.

The login screen for HSES includes the ACF rules of behavior (RoB). Users are expected to use their business contact information. Specifically, this statement in the RoB is presented: Users shall not use personal email, storage/service accounts or personal devices to conduct HHS business or store/transmit HHS data without official written approval.

HSES Helpdesk is used for all communication including opting in and opting out. The HSES Helpdesk consists of a phone number and email address that end users contact for technical support in using the HSES system. Should an end-user contact the HSES Helpdesk and request to opt in or out, their request will be sent to OHS for approval. Once approved the appropriate action will be taken (establish or remove the account).

The method for contacting the HSES Helpdesk is presented on the login screen and main screens in HSES. This allows the end-user to contact the HSES Helpdesk for questions about opting in or out, and other support questions.

For each user type, the personal information collected includes name, email, address and phone number. Users will see the RoB on the screen, which provides the notification that users are expected to avoid providing personal information.

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 Head Start Enterprise System (HSES) PIR Freedom of Information Act (FOIA) site is a voluntary subscription site for publicly accessible information. Users can unsubscribe by contacting the HSES Helpdesk by phone or email. The contact information for the HSES HelpDesk is shown on the login screen

Users of the HSES may request an opt-out via the HSES Helpdesk. Such requests are escalated to the OHS Central Office for review and approval. Should OHS approve the opt-out, it will be handled by the HSES Helpdesk.

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

When a major change occurs to the system, the Office of Head Start (OHS) privacy policy notice on the Head Start website is updated. In addition, the System of Record Notice is updated and posted on the Department of Health and Human Services (HHS) website to inform the public.

System administrators are notified of major changes by the HSES Information System Security Privacy Officer (SSPO) and/or system owner.

The process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system is also listed in the Head Start Enterprise System (HSES) Privacy Policy available online and described below:

The intention is to collect the business related information from the end-user. Throughout HSES business contact or operations data is requested. For login account creation, users should not provide their personal information in those screens. Each user is asked for the name, email, and phone number. Per the HHS/ACF RoB shown on the HSES login screen, the intention is to collect the business-related information from the end-user. HSES does not request personally identifiable information in its data

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 Office of Head Start (OHS) has a defined redress process that gives individuals an opportunity to raise concerns that personally identifiable information (PII) in the system has been inappropriately obtained, used, or disclosed or that PII in the system is inaccurate. Individuals can raise concerns by reporting the issue to the HSES Help Desk via telephone 1-866-763-6841; by e-mail to HeadStart@eclkc.info; or using the "Contact Us" button available on the ECLKC website. This HSES Help Desk information is published on the HSES website.

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 Integrity

Access is disabled for users no longer associated with a grant, or when the grantee organization fails to retain a grant. The hypertext transport protocol secure (HTTPS) internet protocol uses encryption for when users enter or receive data while using the system. The HSES Support staff and organizational users review data periodically.

Availability

HSES is deployed using containers managed by the Cloud Service Provider (CSP), ephemeral packages that contain the application and its dependencies. The application can be provisioned and terminated on-demand with little to no delay while ensuring an immutable infrastructure concept, guaranteeing security at the infrastructure-level. Roles and permissions are periodically reviewed by organizational users and HSES Support staff.

Accuracy

Periodic reviews and updates include monthly organizational user account reviews by Account Administrators for compliancy with previously established account management requirements, service desk follow-ups upon email failure receipt (as required), Program Information Reports (PIR): Annual grantee reminder to maintain and update contacts, grantee user account reminder to maintain and update contacts. Data is verified by the grantee organization. Any changes during the grant's lifecycle is updated by the grantee organization.

Relevancy

Grantee contact data is available depending on activity. Once the grantee relationship terminates, the account and available system data are locked and inaccessible to the grantee. Data is available to HSES organizational users for audit purposes. User login and password data files are covered by National Archives and Records Administration (NARA) General Records Schedule (GRS) Transmittal 31 Section 3.2, Information Systems Security Records, item 0.30; the data will be destroyed when no longer needed for agency/information technology (IT) administrative purposes. The records retention schedule is being determined for the user contact data, and until records are destroyed, they are retained in the system indefinitely.

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.

HSES Help Desk system users are required to have access to personally identifiable information (PII) for their duties in assisting grantees. System administrators are limited to the system owner and the operations team responsible for day-to-day operations of the Head Start Enterprise System

(HSES).

Grantee directors provide the services as described in the Head Start Performance Standards and in accordance with the Improving Head Start for Schools Readiness Act of 2007. These grantees can only access their program information. They cannot access other grantee information. The Office of Head Start (OHS) is responsible for oversight of these grantees, to ensure the performance standards are met and the best quality of care is provided to the enrolled children.

Grantee directors are given user administration privileges to add and modify accounts for users in their specific program, and are authorized to grant that privilege.

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.

Access to information, including personally identifiable information (PII), is managed in the Head Start Enterprise System (HSES) by permissions and privileges that are granted on a per individual basis. Users are only allowed to access information that is specific to their responsibilities. Those users' access is further limited to areas of responsibilities specific to their jobs. Other users at central office, including contractors having overall access to HSES, are placed in positions of trust and have undergone federal security clearance. All users are required to adhere to all policies, procedures and rules of behavior.

Access to PII by users is determined through role-based access control (RBAC), where users are first approved by either the System Owner or their designate appointee; and users are given roles with permissions that define what can be accessed and viewed in HSES. The System Owner determines role assignments necessary to perform job functions.

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.

Federal and contractor staffs who access or operate the HSES system are required to complete the annual Department of Health and Human Services (HHS)/Administration for Children and Families (ACF) security awareness and privacy training program and to read the Rules of Behavior (RoB) and sign the accompanying acknowledgment prior to accessing the system and annually thereafter.

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

OHS provides training on key updates on an as-needed basis that is not performed through HSES.

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.

Grantee contact data is available for as long as the grantee accounts are active. The Office of Head Start (OHS) determines the activation or deactivation of user accounts. Once the grantee relationship terminates, the account and available system data are locked and inaccessible to the grantee. User login and password data files are covered by National Archives and Records Administration (NARA) General Records Schedule (GRS) Transmittal 31 Section 3.2, Information Systems Security Records, item 0.30; the data will be destroyed when no longer needed for agency/information technology (IT) administrative purposes. The records retention schedule is being determined for the user contact data, and until records are destroyed, they are retained in the system indefinitely.

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

The Head Start Enterprise System (HSES) follows the Office of Management and Budget (OMB) and

the Department of Health and Human Services (HHS) requirements, as well as the National Institute of Standards and Technology Special Publication (NIST SP) 800-53 and 800-53A guidance for securing personally identifiable information (PII). All data is secured on a database that can only be viewed by users with the correct privileges. In the application itself, being able to view or modify data is limited based on roles. Certain menus and data are not shown to those without the proper roles.

Physical

Physical controls are inherited from the Cloud Service Provider (CSP).

AWS provides a security all physical controls.

cloud.gov is completely virtualized via AWS GovCloud. cloud.gov leverages the Provisional Authorization for AWS GovCloud for the physical control families.

Technical controls are as follows:

All traffic between end users and the authorization boundary is through hypertext transport protocol secure (HTTPS) (TCP, 443).

Authorized users must provide their username and password to gain access to the system.

The system supports multifactor authentication either through time-based one-time-passwords (TOTPs) or through personal identity verification (PIV) cards.

A maximum of five (5) failed logon attempts are permitted before the system locks the user.

Passwords must be changed once every sixty (60) days.

System and application logs are reviewed regularly to track auditable events defined in NIST SP 800-53 Rev 4 Audit and Accountability (AU-2) using both the Cloud Service Provider's (CSPs) auditing system and an auditing system integrated with the CSP.

The CSP manages system and communications protections such as boundary protections and antivirus/antimalware solutions.

Administrative

Access to HSES is restricted to authorized users who have been approved by either the Office of Head Start (OHS) Project Sponsor or their designated appointee. Access to PII by users is determined through role-based access control (RBAC), where roles are given permissions that define what each user is permitted to view and access. Additionally, all personnel accessing or operating the HSES must read and sign the Rules of Behavior (RoB) prior to gaining access to the system.