

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

01/14/2026

OPDIV:

ACF

Name:

National Data Archive on Child Abuse and Neglect (NDACAN)

PIA Unique Identifier:

P-4187159-605742

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?

Yes

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.

Since the last PIA, additional Personally Identifiable Information (PII) such as employment affiliations, legal documents and IP addresses has been collected. The subject of the PIA has changed from major to minor application (stand-alone). Other updates include routine software and workstation upgrades, consolidation of existing segmented virtual servers onto one upgraded hardware internal server, and the installation of a local backup server. All upgrades occurred within the existing NDACAN network domain and hardware locations.

Additionally, SORN 09-90-1401 Records About Requesters of Restricted Datasets was modified and published on October 20th, 2023 to cover the collection, and both OMB number expiration dates have been updated.

Furthermore, PII is now shared with other organizations within HHS.

Describe the purpose of the system.

Mission: The National Data Archive on Child Abuse and Neglect (NDACAN) promotes secondary analysis of child abuse and neglect data by providing researchers with high quality datasets, documentation, and technical support, and encourages collaboration within the child welfare scientific community. NDACAN acquires and preserves quantitative datasets from national surveys, large-scale longitudinal surveys, state administrative data, and data collected by individual investigators. As part of the services described above, NDACAN offers the following products: archived datasets, codebooks and user guides, data licenses/terms of use agreements, website with dataset lists and help guides, Twitter/X account and YouTube channel, general and technical assistance, brochure and publicity materials, presentations and booths at professional conferences, Updata newsletter, Summer Research Institute (SRI), Summer Training Webinar Series, special data requests (SDRs), Child Abuse and Neglect Digital Library (canDL), Measures Index, and Child Maltreatment Research Listserv (CMRL). These products and services are described in greater detail in the answers below.

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

(1) NDACAN retains non-public, internal working files for processing data acquisitions into distributable datasets with variables that may or may not require obfuscation or re-coding. NDACAN delivers distributable datasets to researchers who apply for and receive a license. No distributable datasets contain PII although some are restricted based on potentially sensitive information (e.g., geography) and thus require researchers to submit an Application for Obtaining Restricted Data from NDACAN (i.e., Data Protection Plan (DDP)) and obtain Institutional Review Board (IRB) approval. Distributable datasets may become non-distributable by request of the data contributor or for lack of research utility as determined by the Children's Bureau.

(2) NDACAN receives license forms and other documents submitted by researchers. The basic license form requests researcher's contact information (name, organization, employment status, email, degree, legal documents, title) and a description of their research purpose. The license forms for restricted data also requests a copy of their IRB's approval notice and Application/DDP with detailed information about the physical locations and security of computer(s) used to store and access the restricted data.

(3) NDACAN collects registrant's contact information (name, email, industry, organization, device identifiers, job title) for online events. NDACAN also collects additional information from Summer Research Institute (SRI) applicants via email (degree, department, address, phone number, email, research background, resume, and optional photos). Bios with optional photos are distributed to SRI participants via email. SRI materials are stored in the NDACAN Zendesk portal and on the NDACAN internal file server.

(4) NDACAN conducts voluntary anonymous and non-anonymous customer surveys. The survey results inform program improvements. Survey comments with attribution may appear by permission of the respondents in NDACAN promotional or descriptive materials, such as its website, CMRL listserv, and Twitter/X.

(5) NDACAN collects aggregate information about user page visits, browser type, geographic location, file downloads, page referrers, and other information collected by Google Analytics. This information helps to understand visitor engagement with the website, improve accessibility, and guide improvements. Website Analytics may be shared as-needed with web programming consultants.

(6) NDACAN collects forms from those requesting aggregate data. Special Data Requests (SDR) form requests background information (name, title, organization, phone number, email) and completed forms are stored in Zendesk and on the NDACAN internal file server. SDR requests are for summary output tables that do not contain PII. NDACAN shares the SDR forms and tables with the Children's Bureau for approval prior to delivery.

(7) NDACAN staff create and publish original research using datasets in its archive following the same protocols for data users. These research data are stored on NDACAN internal workstations or file servers.

(8) When researchers contact NDACAN for technical assistance with a dataset, the exchange is recorded in the NDACAN email system and in Zendesk.

(9) NDACAN stores personal contact information that is voluntarily submitted by customers requesting products and services via the website, email, phone, or mail. Customer information may include: name, degree, title, organization, department, mailing address, phone, email. NDACAN uses this information to communicate with its customers, establish the destination of the datasets it distributes, request feedback, facilitate researcher networking, and other ways as approved by the Children's Bureau. NDACAN does not share or sell this information for marketing purposes. Customers may request to have their contact information altered or to no longer be contacted at any time by calling or emailing.

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

The information that NDACAN collects and stores, including PII, may be shared with the Children's Bureau at their request for their purposes in overseeing the NDACAN program, such as customer satisfaction surveys and special data requests (SDRs). NDACAN sends routine activity reports to the Children's Bureau that include aggregate information about the usage of its products and services.

NDACAN acquires, preserves, and disseminates de-identified child welfare datasets. These datasets do NOT contain primary identifiers such as names, addresses, or Social Security numbers. Some datasets with greater detail that is not PII, such as geography, are restricted to reduce the risk of respondent confidentiality. Those requesting restricted datasets must justify a need for access and must follow additional application requirements, including IRBs and Data Protection Plans.

Datasets in all stages of processing are stored internally on the NDACAN internal file server. NDACAN delivers distributable datasets to licensed researchers through Box.com or through secure file transfer (SFTP) via WS_FTP Server Secure.

NDACAN supports a community of researchers in the analysis of its datasets. The support channels are email, a customer relationship management (CRM) system called Zendesk, a moderated email list called the Child Maltreatment Research Listserv (CMRL), as well as telephone, video chat, and in-person (at conferences).

Customer PII is stored in the NDACAN email system, its CRM system called Zendesk, and in its internal database of customers as a general mailing list that contains a person's datasets licenses and/or Summer Research Institute (SRI) application information. A copy of event registration information is kept on the internal NDACAN file server.

The CMRL listserv processing system stores email addresses and names as provided by subscribers. Subscribers to the CMRL can view the name and email of a person who posts a message to the CMRL, but not the entire subscriber list that is managed exclusively by NDACAN.

NDACAN shares public text, PDF, and videos about its products and services on the NDACAN website, with its videos stored on and embedded from YouTube.

Summer Research Institute (SRI) participants names and institutional affiliation are published once a year in the NDACAN e-newsletter called Updata. To facilitate community building and networking, NDACAN shares SRI participant contact information with the other participants of the same year.

Customer information stored on Zendesk is not shared outside of NDACAN and is only accessed by the Zendesk Administrator to operate or troubleshoot the Zendesk system itself. Zendesk is a FedRAMP certified cloud service.

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

Yes

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

Name

Photographic Identifiers

E-Mail Address

Mailing Address

Phone Numbers

Legal Documents

Device Identifiers

Employment Status

-Organization, Title, Degree, Department and Resumes

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

Public Citizens

How many individuals' PII is in the system?

5,000-9,999

For what primary purpose is the PII used?

NDACAN uses PII in order to communicate with its customer base to deliver its products and services. Communication is primarily via email, but can also occur by phone, video conference, or in-person at conferences. NDACAN also uses PII to verify the institutional affiliation, IRB, and Data Protection Plan of any researcher who requests restricted data. NDACAN stores PII in connection with a customer's dataset order history to provide customers with relevant technical support and to contact them about new or updated datasets as well as upcoming events.

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

NDACAN uses PII to conduct customer satisfaction surveys to improve its services and to obtain metrics about NDACAN's impact on the field of child welfare research.

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

For administrative datasets archived at NDACAN (AFCARS, NCANDS, and NYTD): Section 479 of the Social Security Act and 45 CFR 1355.40

Section 477(f) of the Social Security Act; 45 CFR 1356.80 - 1356.86

1988 Child Abuse and Treatment Act amendment (42 U.S.C. 5101 et seq.).

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.

09-90-1401 Records About Requesters of Restricted Datasets, originally published at 83 FR 11213

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Email

Identify the OMB information collection approval number and expiration date

Non-Governmental OMB #: 0970-0422, (expires 06/30/2026)

Public Law 105-277 OMB #: 0970-0424, (expires 07/31/2026)

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.**

(1) Contract #140D0422P0227 – Firm-fixed Price contract between the Government (HHS/ACF/CB) and vendor (NDACAN) permitting exchange of information to carry out provisions of the contract in accordance with contractual Security Requirements as specified in the Scope of Work. NDACAN has a team of staff and consultants at Cornell University, Duke University, University of California-San Francisco, and Mathematica, and the NDACAN system is housed at Cornell University.

Describe the procedures for accounting for disclosures.

NDACAN follows policies and procedures from HHS/ACF/CB in the case of disclosures, in accordance with contractual Security Requirements as specified in the Scope of Work.

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 website customer contact information form, which is completed by those requesting datasets, user support, and/or requesting to join the mailing list, explains to customers that submitting their contact information allows them to receive NDACAN communications, products, and services. The following notice is provided: “The National Data Archive on Child Abuse and Neglect (NDACAN) uses the information that you provide through this form to deliver its products and services to you. If you request datasets, you will automatically receive messages from NDACAN about updates to datasets you've received. You will also receive general email announcements about NDACAN products and events unless you check the box labeled ‘No Mailings’. If you are no longer using any NDACAN data and no longer wish to be contacted by NDACAN, then please send a message to NDACAN@cornell.edu.” Those registering for NDACAN events, the CMRL email listserv, and/or requesting special data requests (SDRs) are also informed that their contact information is collected to communicate with them and to deliver products and services, and they may email NDACAN@cornell.edu if they are no longer interested in NDACAN’s products and services and no longer want to be contacted.

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.

Customers are notified at data entry points that access to NDACAN’s products and services requires providing the necessary PII for authentication and communication purposes. These products and services include but are not limited to: dataset delivery and licensing, technical support, special data

requests (SDRs), participation in events, membership in the CMRL email listserv, and communications about new or updated datasets and upcoming events (e.g., mailing list, Updata newsletter). Customers control the level of communications from NDACAN by selecting “No Mailings” on the website customer contact information form. If they are no longer interested in NDACAN’s products and services and wish to opt-out of the collection or use of their PII going forward, they can send an email to NDACAN@cornell.edu or call 604-255-7799

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

When significant system changes impact the user experience, NDACAN notifies customers via an email sent to the user’s registered email address. NDACAN uses mass emailing and direct email messages. NDACAN has obtained permission to collect and store PII that is submitted by customers to access its products and services. If disclosure or data uses of PII change, NDACAN notifies customers by email and requests consent as necessary to ensure the customers’ PII protection. NDACAN assumes the user’s consent if no response is received from the user within the response deadline indicated in the notification.

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.

When customers believe their PII has been inappropriately obtained or used, NDACAN staff review and summarize for the individual how the PII was entered into the NDACAN system and how it was used. When PII disclosure is in question, the NDACAN Incident Response Team investigates the individual’s report of misuse of information and alerts the ACF Incident Report Team if it is determined that there was a suspected or confirmed breach. In this case, the NDACAN Incident Response Team works with the ACF Incident Response Team to determine the appropriate course of action. If the NDACAN Incident Response Team determines that there was no breach, they resolve the PII-related requests, including editing or deleting the PII. PII is deleted in a manner that preserves the aggregate metrics that NDACAN maintains and reports to the Children’s Bureau. The NDACAN Director may review non-routine PII concerns for resolution guidance or assistance

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

INTEGRITY: Only approved NDACAN staff with a need-to-know privilege have access to PII data in system. System accounts are reviewed by the NDACAN Systems Administrator annually and as needed. NDACAN follows federal standards for the collection, protection, use, processing, and storage of PII or other data. These safeguards are consistent with the Privacy Act, the Federal Information Security Management and Modernization Acts (FISMA, FISMA 2014), OMB Circular A-130, and National Institute of Standards and Technology (NIST) security standards.

AVAILABILITY: The backup and recovery process is performed by NDACAN as approved by the Office of Chief Information Officer (OCIO) Operations Team. Notification alerts are sent to the NDACAN System Administrator in the event of a failed back-up or if the system goes down. If the system goes down, it shall be restored within 24 hours. ACCURACY and RELEVANCY: NDACAN’s records with PII are maintained in accordance with Clause 1.2(d) of Federal Acquisition Regulation (FAR) (48 CFR Chapter 1) and Health and Human Services Acquisition Regulation Contract Clauses, and further defined in FAR Subpart 4.7, Contractor Records Retention. These include procedures for how best to maintain operational records and what to do when they are no longer needed for current business. Annual reviews are performed to ensure relevancy and accuracy of information in the system.

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.

NDACAN's Standard Operating Procedures (SOP) manual explains that limited staff have access to information systems that contain PII as required to perform their job responsibilities. Job roles and responsibilities are determined by the NDACAN Director. As stated in the manual, "With the exception of information published for public consumption, all users of NDACAN information systems must be formally authorized by appointment as a member of staff or by other process specifically authorized by the NDACAN Director and the Contracting Officer's Representatives (CORs). Access to confidential, personal, or private information in the system is determined through system roles that operate on the principle of least privilege. Only those who require access to perform their job roles and responsibilities, as determined by the NDACAN Director and the CORs, are granted access to the systems they require. System roles are reviewed annually and as needed, and access may be changed at any time."

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 the PII in the system is determined through system roles that operate on the principle of least privilege. Only limited staff have access to the internal database of customers and the customer relationship management (CRM) system called Zendesk that contains most of the PII noted above. The limited staff with this access include the Archiving Assistant the Statisticians/Analysts, the Director, and the System Administrator.

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 including both direct contractors and government personnel are required to participate in the ACF annual security compliance training and privacy training.

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

NDACAN staff are directed to attend any additional PII and data security trainings of its host institution, as applicable.

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.

NDACAN has a record retention schedule that complies with Clause 1.2(d) of Federal Acquisition Regulation (FAR) (48 CFR Chapter 1) and Health and Human Services Acquisition Regulation Contract Clauses, and further defined in FAR Subpart 4.7, Contractor Records Retention. Website mailing list forms, event participant registration forms, and CMRL email listserv subscriber information containing PII have a minimum retention period of 3 years past end-of-funding (contract). The contractor's customer database (i.e., NDACAN's internal database of customers and its CRM system called Zendesk) containing PII of those requesting general information, dataset licenses, and user support have a minimum retention period of 4 years after the end of the fiscal year for the last entry in the record.

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

ADMINISTRATIVE CONTROLS: Access to PII is restricted by job role and requires approval by the NDACAN Director and the Contracting Officer's Representatives (CORs). All NDACAN staff take annual, mandatory training on information security, including acceptable use of systems and data and the handling and protection of PII, as well as additional trainings as needed. All employees must

agree to the terms of NDACAN's Rules of Behavior and Acceptable Use of Resources Policy at every login. Each employee has a unique user ID and password. System policies enforce routine, mandatory password changes. Violations of these policies are punishable up to and including employee termination.

TECHNICAL CONTROLS: Direct access to systems containing restricted data is controlled by a layered approach. First VPN access is secured with active directory authentication and multifactor authentication. Once connected to the system, the data is further secured using active directory group memberships to control access to file shares and files. For data stored on the NDACAN SQL server, application internal roles and user authentication adds an additional layer of protection.

PHYSICAL CONTROLS: NDACAN servers are located in a secure data center, which can only be physically accessed by authorized personnel. The data center is protected by professional security staff utilizing video surveillance and physical intrusion detection systems. NDACAN workstations are kept in a locked office with a keypad entry in a building with video surveillance

Identify the publicly-available URL:

<https://www.ndacan.acf.hhs.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.

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