

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

02/06/2024

OPDIV:

ACF

Name:

National Responsible Fatherhood Clearinghouse Virtual Collaborative Community

PIA Unique Identifier:

P-6949502-828658

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?

New

Does the system have Security Authorization (SA)?

Yes

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The National Responsible Fatherhood Clearinghouse Virtual Collaborative Community (NFRFC VCC) supports the U.S. Department of Health and Human Services (HHS) Administration for Children and Families' (ACF) Office of Family Assistance (OFA). NFRFC Virtual Collaborative Community (VCC) is a critical component of the NFRFC, developed to help facilitate fatherhood stakeholder engagement in peer-to-peer learning and to help fatherhood practitioners collaborate and discuss common issues, challenges, and promising practices and strategies to resolve problems. The NFRFC VCC is a private and secure "community hub" that facilitates collaboration and the exchange of content and information in close to real time, creating the enthusiasm and platform for individuals to work together. Through the NFRFC VCC, the National Responsible Fatherhood Clearinghouse (NFRFC) will be able to help strengthen all who work to support fathers, families, and children in close to real-time. Practitioners can "Continue the Conversation," facilitate the formation of trusted relationships that are dynamic and instantly viable and help facilitate the development of new strategies and solutions that may not emerge using a static website or social media. NFRFC VCC is a complement to the Clearinghouse and fits into its menu of resources seamlessly.

Through the NRFC VCC, members will be able to:

- access and discuss research findings, data, articles, program services, and resources on the STORIES page.
- engage and share with peers on a specific topic by creating or joining a GROUP.
- connect with local, state, and national leaders on the MEMBERS page.
- view NRFC webinars and download connected resources on the WEBINARS page.
- learn about upcoming EVENTS.

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

The NRFC VCC will collect and maintain (store) the following information. This information is stored for “5 year after program cutoff” per NRFC VCC NARA (National Archives and Records Administration) disposition number DAA-0292-2019-0010

- 1) First name, last name and email address of individuals that want to join the NRFC VCC, including system administrators
- 2) Stories that users want to upload to the NRFC VCC (A user may share their name when posting a story)
- 3) Events information that designated NRFC users add to the NRFC VCC (Webinars do not contain user information or PII)
- 4) Documents that users want to share with other NRFC VCC members (Documents do not contain user information or PII)
- 5) Webinars from the NRFC Website (Webinars do not contain user information or PII)
- 6) NRFC VCC survey responses sent by the NRFC VCC administrator (Surveys will not contain user information or PII)

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

The NRFC Virtual Collaborative Community is a collaborative platform and critical component of the NRFC to allow fatherhood stakeholders to engage in peer-to-peer learning and support to help fatherhood practitioners collaborate and discuss common issues, challenges and promising practices, and strategies to resolve problems. NRFC VCC content leverages the existing Office of Family Assistance (OFA) approved NRFC Website products.

The NRFC VCC maintain store either permanently or temporarily the following. Information is not shared with other organizations.

1) As stated in the NRFC VCC System Security Plan, the first name, last name and email are required to establish a password to access the NRFC VCC. The NRFC VCC will allow an individual to submit their information (first name, last name, and email address which are required to establish a password to access the NRFC VCC) and optional information on Fatherhood Interest Areas if they wish to be a member of the NRFC VCC; NRFC VCC Administrative Team will also vet and approve/deny NRFC VCC membership requests (contact information is stored permanently). Administrators are indirect contractors and also members of the NRFC Virtual Collaborative Community that have the designated role of an NRFC VCC administrator.

2) The NRFC VCC will allow users (designated by NRFC) to submit stories. Content will also be moderated by the NRFC. (Stories are permanently stored unless the NRFC VCC Administrative Team deletes the story based on content). Stories are resources for the community of fatherhood practitioners to exchange information on best practices. As such, the NRFC VCC platform is a private and secure “community hub” for this exchange.

3) The NRFC VCC will allow users (designated by NRFC) to post the name of event, event date, event sponsors, place of event, and event details. (Events are permanently stored unless the NRFC VCC Administrative Team deletes the event)

4) The NRFC VCC collects posts and comments from users that are a part of a group within the NRFC VCC (User posts and comments are permanently stored unless the NRFC VCC Administrative Team determines it is necessary to delete the post or comment)

5) The NRFC VCC collects stories and comments from users (User comments are permanently stored unless the NRFC VCC Administrative Team determines it is necessary to delete the comment)

6) The NRFC VCC may collect feedback from users through an Online survey to determine if the content has been helpful to users (Survey responses will be permanent. No PII will be in the survey)

7) The NRFC VCC will contain a link approved by NRFC. Webinars are taken from the NRFC website (This link is permanent unless the NRFC VCC Administrative Team removes the link from the main website)

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

User Credentials

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

Public Citizens

Vendor/Suppliers/Contractors

Fatherhood Practitioners

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

PII is collected in the form of First Name, Last Name, Email address, and password for all users of the NRFC VCC

First Name and Last Name – Used for NRFC VCC member verification

User Credentials - (Email Address and password)– The email address is a unique identifier needed to log into the NRFC VCC. It is also used for sending communications to NRFC VCC members

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

N/A

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

5 USC 301

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 used to cover the system or identify if a SORN is being developed.

ACF National Responsible Fatherhood Pledge Campaign (NRFPC) 09-80-0390

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

Email

Online

Identify the SMB information collection approval number and expiration date

WIA OpDiv

Non-Governmental Sources

Public

Media/Internet

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.

NRFC VCC disclaimer verbiage is displayed prior to an individual joining the NRFC VCC, part of this disclaimer states "You understand that the NRFC VCC collects PII such as name and email address to create your account"

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.

There is no formal opt-out process for the collection of PII. All information collected is done voluntarily and is initiated by the individual who is interacting with the website.

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

An email notification will be sent to all registered individuals when major changes to the system concerning disclosure or data uses will occur. No response to the email notification is taken as user consent. NRFC VCC Help Desk button will be persistent on every page of the NRFC VCC in the bottom right corner if they wish to ask a question or log a concern. In the event that a suspected or known breach has occurred, it will be reported to the ACF incident response team to be handled in accordance with HHS/ACF policy.

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 NRFC VCC Help Desk Tier 1 Support will respond to inquiries from individuals who indicate concern that PII has been inappropriately obtained, used, or disclosed, or that PII is inaccurate. A Help Desk button will be persistent on every page of the NRFC VCC in the bottom right corner if they wish to ask a question or log a concern. The Help Desk automatically establishes a ticket number associated with the concern, and tracks progress towards issue resolution. Once resolved, the concerned individual will be contacted via the email address that is used to submit the ticket.

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: Access to data is limited to authenticated users of the NRFC VCC and authorized NRFC VCC Administrators. System accounts are reviewed by the contractor and NRFC VCC Community Administrators every 90 days.

Availability: The NRFC VCC Backup and Recovery includes maximum down time of 72 hours, maximum recovery time objective of 72 hours, and a maximum recovery point objective of 24 hours. VCC is hosted on Microsoft Azure's commercial cloud which has an uptime greater than of 99%.

Accuracy: Any accuracy concerns can be submitted via the NRFC VCC HELP Desk or to the direct link to the Technical/Customer Support. Reviews of active End User and Administrative User Accounts will occur every 90 days per ACF Access Control Policy, Version 1.0. Based on this review, accounts that are not needed or that have not responded to the request to validate their email address will be deactivated and removed.

Relevancy: Users have the ability to update PII information their profile information. NRFC VCC System and Community Administrators do not enter or update any user's PII.

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.

Access to PII is restricted based on job responsibility and then appropriate system roles based on segregation of duties. NRFC VCC Administrators have access to the PII from individuals that submit a request to join the NRFC VCC. Only NRFC VCC Administrators have access this PII for member vetting and verification purposes.

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 determinations are made based on role-based access controls (RBAC) with access to PII granted to only those needing it to perform a work function. The roles are: Administrator, Data Warehouse, Data Analysis, Service (Tier 1 and Tier 2). Only Administrators have access to PII.

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.

NRFC VCC administrators participate in security awareness training at least annually. Training and awareness will be provided to personnel (system owners, managers, operators, contractors and/or program managers) through Online courses inside the Virtual Collaborative Community

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

No additional training is mandated at this time.

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.

Retention schedule guidelines have not yet been finalized. It would currently be a manual process to adhere to retention schedules, once they are determined. The disposition number is DAA-0292-2019-0010. The NRFC VCC SF-115 form was signed by OFA on July 19, 2019

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

The NRFC VCC resides in Microsoft Azure's commercial cloud.

These technical controls include role-based access controls and multi-factor authentication.

The physical controls will all be inherited by the Azure platform and include the following: Restricting physical access to the data center both at the perimeter and at building ingress points through the help of video surveillance, intrusion detection systems, and 2 rounds of two-factor authentication for each individual accessing a data center floor. Visitors and contractors are required to have ID, sign-in with building security, and be escorted by an authorized staff at all times; Fire detection and suppression systems; Uninterruptible Power Supply (UPS); Climate and Temperature control; and Preventative maintenance”

The administrative security controls employed include adhering to ACF, and Department, policies and procedures around security and privacy; and annual awareness training for all users holding accounts for the system.

Identify the publicly-available URL:

<https://learningcommunity.fatherhood.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?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

Yes