

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

02/28/2025

OPDIV:

ACF

Name:

Temporary Assistance for Needy Families Data Portal

PIA Unique Identifier:

P-3091233-042520

The subject of this PIA is which of the following?

Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.

Implementation

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 system has been deployed to the production environment, and 99 percent of the expected userbase is using the system for data submission. The data files received are being stored securely in AWS S3 buckets, and the data inside of the files are being processed, parsed, and stored in AWS RDS (relational database service). The legacy TANF Data Reporting System was decommissioned at the end of May 2024.

Describe the purpose of the system.

The purpose of the system is to facilitate this reporting requirement. The system allows Administration for Children and Family (ACF) to collect all of this individual-level and aggregate-level data on a quarterly basis so that ACF can aggregate that data, analyze it, and report it back to Congress.

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

States and territories are required to collect monthly and report quarterly disaggregated data on families and individuals receiving assistance under the State Temporary Assistance for Needy Families (TANF) program and separate state programs funded as part of a State's maintenance-of-effort requirement (SSP-MOE). Disaggregated data includes personal identifiers for most individuals in cash assistance households (including date of birth, Social Security Number, case numbers, and zip code), public benefits received, demographics, and work-related activities. Social Security Numbers are collected in order to match to earnings data in the National Directory of New Hires (NDNH) system operated by the Office of Child Support Services (OCSS) and under a separate PIA for employment outcomes measurement. Aggregate data on families applying for and receiving TANF assistance is also collected (e.g. number of one- and two-parent families receiving assistance, number of families applying for assistance, etc.). Tribal TANF programs submit similar data.

Temporary Assistance for Needy Families Data Portal (TDP) also collects and stores non-sensitive PII on users who access the system in a professional capacity to submit data or run a limited set of reports. This information includes name and work email address.

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

Each state and U.S. territory that operates a program of cash assistance for low-income families using federal Temporary Assistance for Needy Families (TANF) funding is required by statute to collect data about the recipients of that cash assistance. Federally recognized tribes administering TANF programs are also required to collect similar data.

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) established data reporting requirements for States operating the Temporary Assistance for Needy Families (TANF) program. On April 12, 1999 the Department of Health and Human Services (DHHS) issued final regulations on TANF data reporting requirements. All of the information that the system collects is specified by statute and regulation.

All data collected are used primarily for Office of Family Assistance's (OFA) monitoring of program performance and compliance with federal regulations. PII (social security numbers and date of birth elements) of TANF recipients are used for TANF reports (TANF Caseload size, Characteristics and Financial Circumstances of TANF Families, Work Participation Activities among TANF families).

The OFA File Plan notes that these data are permanent and should be transferred to the National Archives 20 years after cutoff.

The system collects and stores non-sensitive PII of individuals using the system for program management purposes. This information includes names and work email addresses. This information is used only for user management tasks.

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

Date of Birth

Name

E-Mail Address

Case identifiers (case numbers assigned to individuals)

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?

1,000,000 or more

For what primary purpose is the PII used?

The primary use for PII is for performance monitoring and compliance with federal regulations. Performance monitoring includes information about how many TANF recipients in a given state met their work participation rate requirements as required by law to measure how well states are helping TANF recipients prepare for and find work.

The social security numbers are used to identify the unique number of individuals per TANF household who are engaged in work-related activities, which is critical to OFA's performance monitoring purposes. These numbers are also shared with the Office of Child Support Services (OCSS), which manages the National Directory of New Hires (NDNH) data, a key source of employment data. This PII is shared with OCSS to match to the NDNH to acquire the employment and earnings records for TANF recipients. Again, OFA tracks the employment outcomes of TANF recipients as part of its routine performance monitoring.

The date of birth element is used to validate whether individual records are for children or adults. This helps to ensure that the appropriate records are used to characterize the TANF population and (again) for monitoring of program performance (e.g. only eligible adults or minors are counted in the work participation calculation).

The system collects and stores non-sensitive PII of individuals using the system for program management purposes. This information includes names and work email addresses. This information is used only for user management tasks.

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

Secondary use of PII for research on TANF recipients' economic outcomes for Congress, policymakers, and other stakeholders in the field of welfare policy and economic development.

PII is used to track the economic outcomes of TANF recipients over time. The social security numbers are used to identify the unique number of individuals per TANF household who are engaged in work-related activities, which is critical to OFA's performance monitoring purposes. These numbers are also shared with the Office of Child Support Services (OCSS), which manages the National Directory of New Hires (NDNH) data, a key source of employment data. This PII is shared with OCSS to match to the NDNH to acquire the earnings, new hire, and unemployment insurance records for TANF recipients.

Non-sensitive PII of system users is also used for system access control.

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

Sec. 411. of the Social Security Act [42 U.S.C. 611]
(45 CFR Part 265)

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.

09-80-0375 OFA Temporary Assistance for Needy Families (TANF) Data System, HHS/ACF/OFA

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Hardcopy

Identify the OMB information collection approval number and expiration date

09-80-0338, approved through 10/31/2026

Other

Government Sources

Within OpDiv

State/Local/Tribal

Other Federal Entities

Non-Governmental Sources

Public

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.

Memorandum of Understanding (MOU) with OCSS, Data Sharing Agreements with the Census Bureau, CBO, and CRS

For the purposes of matching TANF data with the Office of Child Support Services (OCSS) National Directory of New Hires (NDNH), OFA quarterly submits SSNs to OCSS's data processor (SSA) through a Trusted Internet Connection. Once TANF data has been matched to NDNH earnings data, the matched data is de-identified by replacing real SSNs with non-SSN numbers. The de-identified data are returned to OFA for analysis.

Describe the procedures for accounting for disclosures.

Memorandum of Understanding (MOU) with OCSS, Data Sharing Agreements with the Census Bureau, CBO, and CRS

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OCSS, the Census Bureau, CBO, and CRS, and approved HHS contractors and grantees have all agreed to follow HHS disclosure incident response standards. ACF offices will

adhere to federal laws and regulations with respect to incident reporting. The Users agree to report any breach of personally identifiable information (PII) from the OFA data file(s), loss of these data or disclosure to any unauthorized persons to the ACF Chief Information Officer as well as OFA's Point of Contact for this agreement by telephone and e-mail notification within one hour and to cooperate fully in the federal security incident process.

As an Operating Division of HHS, ACF follows established HHS policies for IT Security and Privacy, including:

- HHS Policy for Privacy Impact Assessments (PIA) (2009-0002.001 2/9/2009)
- HHS Policy for Responding to Breaches of Personally Identifiable Information (PII), (2008-0001.003 2/09/2009)
- HHS Policy for IT Security and Privacy Incident Reporting and Response (2010-0004 4/05/2010)

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

Not applicable. Notice is responsibility of the states (as well as territories and tribes).

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.

States (as well as territories and tribes) are responsible for providing methods for individuals to opt-out of the collection or use of their PII. There is no opt-out option as States are required to comply with Sec 1137 of the Social Security Act.

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

TANF does not receive this information directly from individuals. If there are major changes to the application, these notices are distributed by the TANF Data Portal program lead to identified Program Managers at the state, territory, or tribal level.

States (as well as territories and tribes) are responsible for the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur 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.

TANF does not collect information directly from individuals and therefore does not have a process in place to address individual concerns. Data is transmitted by a state, territory, or tribal agency. Any individual concerns would be addressed at the state level, according to state guidelines.

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

Periodic reviews will be conducted of the contractor's staffing roster and matching users with our list of permission roles, ensuring that only approved users have access to PII.

Availability

OFA's TANF Data Division publishes summary data tables on a quarterly basis (caseload data) and annual basis (WPR, characteristics and financial circumstances) on OFA's website.

Accuracy

OFA statisticians do quarterly reviews of data and send feedback to states in order to improve the quality of their data. We also offer periodic technical assistance to states regarding the accuracy of their data.

Relevancy

OFA's records retention schedule for data, reports, and tables: DAA-0292-2016-0006-0011. Records remain relevant for longitudinal data analyses and other research to track outcomes for TANF participants.

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.

All system users have a defined role and are subject to HHS security protocols. Periodic reviews will be performed by the system owner and government technical lead, conducting the contractor's staffing roster and matching users with TDP's list of permission roles, ensuring that only approved users have access to PII.

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.

OFA administrators assign read-only access to the TDP for OFA-approved staff (statisticians) to carry out routine data reviews and analysis responsibilities.

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.

HHS data security training: All OFA staff are required to complete data security and records management training annually.

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

Not applicable, system-specific training is not needed for TDP.

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 records in the system are retained for routine business purposes, which is allowed given the records schedule (DAA-0292-2016-0006) and SORN (Tribal TANF System Number: 09-80-0373; TANF System Number: 09-80-0375)

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

Administrative

The system requires role-based authorization for all users, as well as proper training for OFA staff through completion of HHS Security Awareness training, signing HHS Rules of Behavior and proper on boarding following HHS rules.

Technical

Audit trail, logging, and authentication controlled by two factor authentication and PIV cards.

Physical

TDP is hosted on Cloud.gov which is FedRAMP approved and uses Amazon Web Services (AWS) GovCloud as its underlying foundation. All of the physical controls are maintained and secured by AWS.

Identify the publicly-available URL:

<https://tanfdata.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