US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

06/15/2016

OPDIV:

SAMHSA

Name:

Services Accountability Improvement System

PIA Unique Identifier:

P-7993318-614611

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?

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.

The SAIS system was decommissioned at the end of a task order and was replaced by the Common Data Platform (CDP) system. The SAIS system is being restored at SAMHSA's request as an interim solution while SAMHSA works towards a consolidated solution for data collection across centers. SAIS application provides an electronic data entry portal for grantees to log on and enter all client data collected. Both grantees and Government Project Officers (GPO's) are able to monitor performance of meeting their targets for the number served and improved overall client outcomes in alcohol use, illicit drug use, criminal involvement, housing and employment from when a client comes into treatment (baseline) and at 6-month follow-up. Grantees and GPO's can also run standardized system reports to meet congressional reporting requirements. The grantees will provide their work e-mail, phone number and address in order to receive funding for the grant.

Describe the purpose of the system.

SAIS is a web-based data collection portal used by Center Substance Abuse Treatment (CSAT) staff and grantees to monitor the performance of grants given to grantees. Data is collected by grantees and entered into SAIS. Data is verified and validated using logic checks and then used to run customized system reports to respond to SAMHSA's Government Performance and Results Act (GPRA) reporting requirements which tracks the effects and accomplishments of its discretionary grant programs for substance abuse (SU) treatment services.

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

SAIS processes aggregated data entered by grantees pertaining to tracking the substance abuse trends of clients enrolled in treatment and statistics regarding the success and failures of the SU treatment discretionary grant programs. The information collected by the SAIS using the GPRA survey form (http://www.samhsa.gov/grants/gpra-measurement-tools/csat-gpra/csat-gpra-discretionary-services) does not contain any confidential client information. The client data collected pertains to health risk behaviors such as alcohol use, drug use, homelessness, and sexual risk history to identify those individuals in need of substance use (SU) treatment and other wrap-around case management services. Grantees record the client ID using locally generated randomized numbers to track client outcomes at intake and follow-up and to prevent duplicate counts in reporting.

System user (grantees and GPO's) information (name, work phone number, email and work addresses) stored in SAIS are used for authentication purposes only during log-in for data entry.

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

The information uploaded by the grantees and collected by the SAIS system does not contain any confidential information or personally identifiable information (PII). Grantees assign client IDs using computer generated number. SAIS grantees with more sophisticated local data systems upload de-identified aggregated information collected using the GPRA survey form they gather about the substance abuse and statistics regarding the success and failures of discretionary grant programs.

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

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

Employees

Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

Authentication for system user account access at log-in.

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

SORN is In Progress

Identify the sources of PII in the system.

Email

Government Sources

Within OpDiv

State/Local/Tribal

Non-Governmental Sources

Other

Identify the OMB information collection approval number and expiration date

Current OMB: #0930-0285 Expiration Date 1/31/2016 New OMB clearance is expected 2/1/2016 and to be extended until 1/31/2018

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.
Notice is not provided as this information is part of their grant application to SAMHSA. Only updated information is retrieved from the Project Director when personnel changes occur and are approved at SAMHSA by grants management specialist and the government project officer.

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.
Individuals cannot object to the collection or use of their PII because data collection and reporting is a requirement of all grant programs at SAMHSA.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
If a major change to the system occurs, SAIS users will be notified through email notification originating from the (RTI) Research Triangle Institute Help Desk. The change will be described and consent will be implied unless the user responds to the email with a specific request.

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.
If a SAIS user believes their contact information has been inappropriately obtained by the system, used, or disclosed, the user may contact the Help Desk and register a comment or complaint. If a compliant is registered, it will be escalated immediately through RTI management to SAMHSA's COR and Privacy Officer for processing and resolution. RTI's Privacy Officer and processes may also be invoked to help resolve the problem.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.
RTI receives information about the user data accuracy and availability directly from users through the RTI Help Desk when a problem is detected. If a SAIS user finds their contact information has been incorrectly entered into the system, the user will contact the Help Desk to have the information corrected. The integrity and availability of the information is maintained by the information system controls at the application level and put in place in the GovCloud hosting environment.

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

Users:
Only have access to the data they enter into the system.

Administrators:
The system administrators will have access to allow to make changes when new grants are awarded or when a change in personnel occurs. RTI will have access to add/remove users to include adding new grant awards and deleting expired awards.

Contractors:
Depending on their user role as low-administrator role.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.
Access to the PII in the system is limited by role: only SAMHSA and RTI staff members with Administrative or Low Administrative privileges are allowed access to the PII. These roles and access are approved by the SAMHSA COR and RTI Project Management on a case by case basis.

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.

The SAMHSA and RTI staff members who will access the PII are granted Administrative or Low Administrative privileges and are approved by the SAMHSA COR and RTI Project Management on a case by case basis. The system uses administrator-defined user groups to restrict access by role. A project system manager will create and maintain appropriate user identification groups.

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.

The RTI staff members who will access the system receive security awareness training and human subjects training immediately upon employment and annually thereafter. RTI's training period for all employees typically begins in January of each year. Among the topics addressed are: Definitions; Rules of behavior; RTI Policies and Procedures; Access Controls; Email Security; Internet Security; Secure Data Storage; Information Security Incidents; HIPPA Compliance for Business Associates; Insider Threats; and Additional RTI Resources.   SAMHSA personnel are required to take and maintain HHS Information Systems Security Awareness Training.

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

SAIS users are offered monthly webinars on SAIS system use; security issues may be addressed during these trainings.

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.

At this time SAMHSA is in the process of reviewing their electronic records schedule. We will update this portion of the PIA upon the completion of this review.

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

The SAIS system is housed in the SAMHSA GovCloud environment, which protects the confidentiality, integrity, and availability of data through the application of administrative, technical, and physical controls that meet the appropriate SAMHSA-directed impact level of the data. Standard access security features include user identification and password, lockout of account upon repeated entry of an invalid password, file- and directory-level security, periodic backups, anti-virus software, and administrator-defined user groups. At the application level, the system uses user identification and password, lockout of account upon repeated entry of an invalid password and other security measures.

Identify the publicly-available URL:

Link will be provided after authority to operate (ATO) is final.

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?

No

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?
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