

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

12/29/2016

OPDIV:

SAMHSA

Name:

DSI Web Systems

PIA Unique Identifier:

P-5992188-152800

The subject of this PIA is which of the following?

General Support System (GSS)

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.

Contractor

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

Describe the purpose of the system.

The Division of Services Improvement (DSI) Ideas Exchange (IE) web application, Learning Management system (LMS) and Mailing List Management systems support the Clinical Technical Assistance (TA) Project's mission to help take existing knowledge and use it to combine service and science and strengthen the behavioral health services workforce. The DSI Web System also supports the adoption of practices that will produce the highest level of effectiveness at reasonable cost. It also strives to create a mutually beneficial synthesis between the behavioral health field and all of Center for Substance Abuse Treatment's (CSAT) knowledge development and application activities.

The Ideas Exchange web application facilitates collaboration, communication, continuous learning, and sharing of resources and best practices between grantees in the DSI community and SAMHSA. The Learning Management system offers several accredited courses and Continuing Education Units (CEUs) to the community.

The Mailing List Management system allows project staff to send customized email messages to user groups.

The Ideas Exchange web application, Learning Management system and Mailing List Management systems are hosted at the Amazon Web Services (AWS).

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

The user profile data elements submitted by grantees who are members of the Ideas Exchange grantee portal include first and last name, e-mail address, photograph, biography, title, credentials, program area, organization information, grant information, address, telephone number, and fax. The information is used to verify eligibility for Ideas Exchange access, to support contractor communication with grant personnel, and to support peer-to-peer communication. The PII shall be automatically deleted after the end of the member's grant. Information provided by grantees in registering for DSI LMS accounts include first and last name, e-mail address, Address, photograph, Interests, degrees, professional credentials, phone, program area, grant program and organization and title.

The information is used to verify eligibility for LMS access, to support contractor communication with grant personnel. The PII shall be automatically deleted after the end of the member's grant. Information on grantees collected to maintain lists in DSI List systems include first and last name, and e-mail address. The information is used to send customized email messages to user groups. The PII shall be automatically deleted after the end of the member's grant.

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

The DSI Web Systems include the DSI Ideas Exchange grantee community portal, the DSI Learning Management System (LMS), and the DSI List e-mail list management and communication system. Together, these applications support five DSI Grant Programs, including the Adolescent, Criminal Justice (CJ), Pregnant and Post-partum Women (PPW), SBIRT, and Targeted Capacity Expansion, Technology-Assisted Care (TCE-TAC) Programs.

The Ideas Exchange collects first and last names, title, credentials, photograph, biography, program area, grant(s), project roles, organization affiliation, city/county, address, telephone number, and e-mail address for categories of individuals, including grantee members, project managers, community managers, and administrators. The PII is used to verify eligibility for Ideas Exchange access, to support contractor communication with grant personnel, and to support peer-to-peer communication. The profile pictures are used to support collaboration among grantees. The PII shall be automatically deleted 60 days after the end of the member's grant.

The Learning Management System collects first and last names, title, credentials, photograph, biography, program area, grant(s), project roles, organization affiliation, city/county, address, telephone number, and e-mail address for categories of individuals, including managers, course creators, students and administrators. The PII is used to verify eligibility for LMS access and to generate reports on student activity. The profile pictures are used to support collaboration among students. The PII shall be automatically deleted 60 days after the end of the member's grant.

The ListServ collects username and e-mail address for ListServ administrators, which is used to create and maintain administrator accounts. The ListServ also collects subscribers' name and email address, which is used to send e-blasts. The PII shall be automatically deleted 60 days after the end of the member's grant.

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
Grant Affiliation and Role
Degrees and Professional Credentials
Organization Affiliation
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
Ideas Exchange, LMS, and Mailing List grantee community members who are associated with grants but not affiliated with the government.

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

The PII is used by the DSI applications to verify eligibility for DSI Web System access, to support contractor communication with grant personnel, to support peer-to-peer communication among grantee personnel, and to maintain records of learning achievement and knowledge attainment through courses completed on the LMS.

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

No secondary uses.

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

5 USC 301 Departmental Regulations

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Email
Online
Other

Government Sources

Within OpDiv

Non-Governmental Sources

Private Sector

Other

Identify the OMB information collection approval number and expiration date

OMB approval is not required based on the types and use of PII collected.

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.

Individuals are provided notice via e-mail that PII will be collected for the purpose of access to the IE and LMS. Grantees are invited to create accounts for the Ideas Exchange and LMS as part of the grant initiation process.

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 PII data elements that grantees are required to provide during account registration are the minimum set required to verify identity and eligibility for system membership. Grantees can elect not to register or to submit questions or comments to the DSI support team through the system help desk.

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

No major changes to the management or disclosure of PII are anticipated. Grantees would be notified of any such changes in the future through e-mail communication using the DSI List systems.

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.

Users can ask questions and raise concerns about PII use and disclosure by contacting the DSI support team using the phone number and/or email address posted on the Ideas Exchange and LMS home pages. Questions and concerns will be acknowledged upon receipt by the DSI support team. Concerns will be forwarded directly to the DSI GPO (Government Project Officer) at SAMHSA when escalation is needed and responded with in 24 hours.

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

The PII data elements that are part of user profiles, including first and last names, e-mail address, photograph, and biography, are voluntarily submitted and updated by members themselves. PII data that are apart of the member directory, including title, credentials, grant program(s), project(s), and project role(s) are obtained from SAMHSA programs and subsequently verified and updated by staff at JBS quarterly.

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

Users:

Users of the Ideas Exchange collaboration portal access other members' names, program and organization affiliation, title, e-mail address, and phone number for collegial communication.

Administrators:

Application and system administrators have access to PII for systems management and user support.

Developers:

Developers have limited access to PII as needed to fix system defects.

A process is in place to sanitize PII for the Ideas Exchange.

Contractors:

JBS International contract staff have limited access to PII as needed to communicate with grant staff.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Only staff with designated roles on the DSI projects at JBS and SAMHSA are provided access to PII through application and system accounts. Staff accounts and access to PII are terminated immediately when the required staff roles are removed. Grantees' access to colleagues' PII through the Ideas Exchange is through application accounts approved by system administrators after verification of grantee status and eligibility. Application accounts are terminated 6 months after grantees' eligibility for status expires or is removed.

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.

Only system administrators and project staff with designated project and community manager roles on the DSI projects are given access to PII through the application and/or supporting back-end systems.

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 JBS staff with access to the DSI Web Systems are required to complete a security awareness training course annually to be granted and retain access. In addition, system administrators are required to complete a security awareness training course for system administrators and SAMHSA records management training to acquire and retain access to the systems.

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

System administrators are required to complete a security awareness training course for system administrators annually and SAMHSA records management training to acquire and retain access to the systems.

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.

All PII information is obtained electronically. PII is deleted from the DSI Web System along with user application accounts when member eligibility is removed or expires. Currently SAMHSA is in the process of updating our electronic records and will provide the appropriate general records schedule upon the NARA (National Archives and Records Administration) determination.

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

Access to administrative and PII data management functions on the web applications is strictly limited based on least privileges principles to authorized system administrators and DSI project staff with relevant responsibilities designated by SAMHSA and/or JBS. Information is secured on the systems using administrative, technical, and physical controls including segregation of duties, data and database encryption, network access controls and segmentation, and FedRAMP-compliant cloud computing physical security controls.

Identify the publicly-available URL:

<https://www.ideas-exchange.net>

<https://learn.ideas-exchange.net>

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.

Session Cookies that do not collect PII.

Persistent Cookies that do not 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