

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

August 04, 2017

OPDIV:

SAMHSA

Name:

SBIRT Evaluation

TPWA Unique Identifier:

T-3234442-404163

Is this a new TPWA?

Yes

Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?

No

If SORN is not yet published, identify plans to put one in place.

Not Applicable.

Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?

Yes

Indicate the OMB approval number and approval number expiration date (or describe the plans to obtain OMB clearance).

OMB Approval OMB # 0930-0359

Indicate the OMB approval number expiration date (or describe the plans to obtain OMB clearance).

Expiration Date: 6/30/19 12:00 AM

Describe the plans to obtain OMB clearance.

Explanation: Not Applicable.

Does the third-party Website or application contain Federal Records?

No

Describe the specific purpose for the OPDIV use of the third-party Website or application:

The Screening, Brief Intervention, Brief Treatment and Referral to Treatment (SBIRT) Cross-Site Evaluation III performs analyses for the Screening, Brief Intervention, Brief Treatment and Referral to Treatment (SBIRT) grant program, which is funded and administered by SAMHSA's Center for Substance Abuse Treatment (CSAT). The SBIRT Performance Site Survey system collects data from personnel at performance sites associated with SBIRT grant programs that supports analyses conducted as part of the SBIRT Cross-Site Evaluation III. The SBIRT Performance Site Survey helps identify program activities that are part of the SBIRT grant program, and results from the SBIRT Performance Site Survey are used to identify the effect these activities may have on patient/client outcomes and treatment systems.

RTI (company name), Direct Contractor to SAMHSA, is responsible for running the SBIRT Performance Site Survey functions. RTI collects data using a commercial, off-the-shelf product called Voxco. Voxco allows researchers to develop and field custom surveys for certain audiences. RTI, on behalf of the SBIRT Cross-Site Evaluation III project, emails each respondent a link to the SBIRT Performance Site Survey. The survey responses are stored in a Voxco database within RTI's network.

The SBIRT Cross-Site Evaluation III team collect PII in the form of names and emails of SBIRT grant program staff, and enter these PII into the Voxco system. This PII is then used by Voxco to send a customized invitation to each participant asking them to participate in a Web-based survey via an emailed link. That information will also serve as the user credentials needed to access the survey. The PII will only be used for emailing the invitation. Such information is not collected in the survey itself, and is stored separately from the survey data collected. The survey will collect the following information: staff roles and demographics (e.g., job title, tenure in job title); how SBIRT was implemented (e.g., perceptions of how well SBIRT was integrated into workflow); the use of health information technology (HIT) to support the implementation of SBIRT services (e.g., use of electronic medical records or electronic health records to support SBIRT service delivery).

PII is collected by Voxco for RTI users and system administrators. The PII consists of user credentials, including username, password, and email address. Users and system administrators include only RTI employees with RTI employment

Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?

Yes

Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:

The third-party website does not provide public data. Only respondents (program directors at each performance site) will be granted access to the private website to enter information.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?

Yes

How does the public navigate to the third party Website or application from the OPIDIV?

Other...

Please describe how the public navigate to the thirdparty website or application:

The only users of the website will be the respondents (program directors at each performance site and any staff they delegate). Respondents are granted access to the system via email. The email provides a unique URL that allows them to reach the survey system via the web. The survey will not contain any SAMHSA logo and the e-mail address will be an RTI address; however, in our introductory text we do indicate that the survey is being conducted to support a cross-site evaluation for SAMHSA.

If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to anongovernmental Website?

No

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?

No

Provide a hyperlink to the OPDIV Privacy Policy:

<http://www.hhs.gov/privacy.html>

Is an OPDIV Privacy Notice posted on the third-party website or application?

Yes

Is PII collected by the OPDIV from the third-party Website or application?

No

Will the third-party Website or application make PII available to the OPDIV?

No

Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:

The SBIRT project collects PII in the form of names and emails of program staff in order to invite them to participate in a Web-based survey. That information will serve as the users' credentials to complete the survey. The PII will only be used for the logistical purpose of emailing invitation. Such information is not in the scope of the survey study and therefore it will not be collected in the survey nor be stored along with the survey data.

Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:

No PII is shared.

If PII is shared, how are the risks of sharing PII mitigated?

No PII is shared.

Will the PII from the third-party website or application be maintained by the OPDIV?

Yes

Describe how PII that is used or maintained will be secured:

Contact information used to reach the respondents is protected as follows:

Administrative: Records are maintained according to specific records control schedules and policy as determined under the contract and by HHS. PII is secured administratively by role-based access that limits information visibility only to those authorized to see it.

Technical: The PII is secured using Secure Socket Layer (SSL) during transmission and form authentication with role-based access specific to the authenticated user.

Physical: Access to RTI servers is protected via multi-level key card and code access. Access to RTI physical campus is protected via keycard and code access.

What other privacy risks exist and how will they be mitigated?

No other security risks are anticipated.