US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:
05/31/2016

OPDIV:
SAMHSA

Name:
Community Support Evaluation Data System

PIA Unique Identifier:
P-7803939-294678

The subject of this PIA is which of the following?
Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.
Design

null

Does the system include a Website or online application available to and for the use of the general public?
No

Identify the operator.
null

Is this a new or existing system?
New

Does the system have Security Authorization (SA)?
No

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.
The Community Support Evaluation Data System is a web-based data collection and repository that is used to collect and store program evaluation data for two Substance Abuse and Mental Health Services Administration (SAMHSA) programs. The programs supported are the Behavioral Health Treatment Court Collaborative (BHTCC) Evaluation and Supported Employment (SE) Evaluation.

Describe the type of information the system will collect, maintain (store), or share.
The following information is collected and stored for the Behavioral Health Treatment Court Collaborative (BHTCC) Evaluation.

Biannual Program Inventory—Grantees submit program information on cumulative program activities twice annually. Information gathered includes an inventory of all activities conducted as part of the BHTCC grant program. No individual level information are gathered or stored.
18 month client level abstraction tool—Grantees submit client-level information on recidivism and long-term BHTCC program outcomes. Data include re-arrest dates, recommitment dates, revocation of parole/probation dates, and risk assessment quantitative scores. Data include a client ID that is autogenerated through a separate Government Performance Results Act (GPRA) data system and is not linkable to PII through the CSEDS.

Services Accountability Improvement System (SAIS) Client-level GPRA data—SAMHSA provides the contractor with client-level GPRA data. A system generated ID is included in these data. Employment status is a data element in the client-level data. The employment variable pertains to the type of employment (e.g., full, part-time) and cannot be used to identify an individual. Comparison Study Tool data—2 comparison study sites submit individual-level data on individuals who are not participating in the BHTCC program but are comparable in program eligibility at baseline and 6 months. Data abstracted through case records include employment status. The employment variable pertains to the type of employment (e.g., full, part-time) and cannot be used to identify an individual. The following information will be collected and stored for the Supported Employment (SE) Evaluation. Biannual Program Inventory—Grantees submit program information on cumulative program activities twice annually. Information gathered includes an inventory of all activities conducted as part of the SE grant program. No individual level information are gathered or stored.

Transformation Accountability system (TRAC) Client-level GPRA data—SAMHSA provides the contractor with client-level GPRA data. A system generated ID is included in these data. Employment status is a data element in the client-level data. The employment variable pertains to the type of employment (e.g., full, part-time) and cannot be used to identify an individual.
The CSEDS stores name and email addresses for user access and data entry and upload (SAMHSA, grantee, and contractor users). This information is used for credential purposes to determine level and permit user access. This information is not connected to any data stored in the CSEDS.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.
CSEDS collects the name and email addresses for user access and data entry/upload (SAMHSA and SAMHSA grantee name/email addresses as well as contractor name/email addresses). This information is stored at the system level and is not transferred/shared with any other data collection system. However, the system is used to provide user access/credentialing, launch data collection, provide system support, and/or send reminders to grantees about data collection activities. The following provides an overview of the specific information and purpose of this information.

The Biannual Program Inventory (BHTCC and SE Versions) is collected to demonstrate infrastructure development and services provided through the BHTCC and SE SAMHSA programs. No information is gathered on individuals through these data collection activities. The 18 month data abstraction tool is used to understand long-term criminal justice outcomes of BHTCC program participants. The data elements include a unique ID (assigned through the separate SAIS system), number of arrests (and date of first arrest), number of recommitments to the state department of corrections and/or local jail (and date of first recommitment), and number of probation or parole revocations (and date of first revocation). The data include the risk assessment score of the BHTCC program participant at program entry, age at first arrest, and number of prior arrests. These data are control variables for examining long-term program outcomes. These data are not linkable to identifying information through the CSEDS.

The Comparison Study Tool (baseline), Comparison Study Tool (6 month), and Comparison Study Tool (18 month) are used to abstract existing data from a comparison sample of eligible offenders. These data document the impact of the BHTCC program on clinical, functional, and criminal justice outcomes compared to those experienced by a comparable sample of offenders who are not part of the BHTCC program. The data include a unique identifier (random 7 digit number assigned by the grantee). The data are not linkable to identifying information in the CSEDS. SAIS Client-level data are stored on the CSEDS for data analysis. These data, combined with other qualitative data, not stored in the CSEDS, are used to answer primary evaluation questions for the BHTCC Evaluation.

The data will be used to assess short-term programmatic and behavioral health outcomes for BHTCC participants; document the participant's experiences with peer-based supports; and determine what the short- and long-term criminal justice outcomes are for BHTCC participants. These data include a unique identifier assigned through the SAIS system. These data can't be used to link to identifying information in the CSEDS. TRAC Client-level data will be stored on the CSEDS for data analysis. These data, combined with other qualitative data, not store in the CSEDS, will be used to answer primary evaluation questions for the SE Evaluation. The data will be used to assess short-term programmatic, behavioral health, and employment-specific outcomes (e.g., employment status, wage data) for SE participants. These data include a unique identifier assigned through the TRAC system. The data include employment status; however, these data do not contain identifiers and can't be linked to identifying information.

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

Employment Status

Date of first re-arrest/Probation Revocation/Recommitment/quantitative risk assessment score

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

Employees

Public Citizens

Vendor/Suppliers/Contractors

Community Support grant program participants (i.e., consumers of the program)

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

To provide access to the system; to gather and store data use agreements with system users; and to provide access to survey data collection/reminders to grantees.

Employment status PII is a secondary data element that is provided to the contractor and stored in the CSEDS. These data are used as an outcome indicator for analysis/reporting.

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

PII will not be used for any secondary purpose.

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

Government Performance and Results Act of 1993

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

No

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Email

Online

Government Sources
Within OpDiv

State/Local/Tribal

Non-Governmental Sources
Public

Identify the OMB information collection approval number and expiration date
OMB Clearance is in progress.

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.
System user PII is collected only to provide access to users of the system (name/email). All users will sign a data access and use agreement prior to obtaining full access to the system.

Employment status, arrest date, number of arrests, revocation date, and recommitment date can't be used to identify and link to an individual. There is no way to identify an individual participant through the CSEDS by using any one of these variables.

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 opt out of the collection of their information because system users will need to provide name and email address to register for the system.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
The site user PII is only for access to the system. There are no secondary uses for this PII, only for use and registration of the system.

Data use agreements are in place between the SAIS and TRAC contractors and the CSEDS contractor. Because the SAIS and TRAC data are masked with autogenerated client IDs, there is no way to link employment status, arrest date, revocation date, or recommitment date to an individual client through the CSEDS.

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.
System user PII is collected only to provide access to users of the system (name/email). All users have access to a CSEDS help desk to raise any concerns about the use, disclosure, or accuracy of their PII. This information is used solely to provide user registration and determine/grant site access. This information will not be available/shared with other system users and will not be linked to any evaluation data. The system help email is CSEDS-HELP@icfi.com.

Employment status, arrest date, number of arrests, revocation date, and recommitment date(s) can't be used to identify and link to an individual (submitted by grantees through the 18 month abstraction tool). SAIS and TRAC GPRA data are collected and entered through a separate system. Thus, any processes for use and disclosure of individual level data will be shared during the data collection gathered through a separate web-based data collection and management system supported by SAMHSA. The variables are masked and can't be used to link to an individual (including employment status). The 18 month data abstraction is not collected from individuals but extracted from existing data system; therefore, there is no way to consent as there are no direct participants and no data can identify a person within the data system.

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

All CSEDS data entry and uploads have data validation processes to ensure proper format of data entry. In addition, the contractor reviews data quality monthly for missing data and historically missing variables.

User PII is kept validated through regular email contacts with users to ensure accurate contact information. Updates to user information are made immediately into the system. If grantee, SAMHSA, or contractor staff changes are made, user access is removed and PII of these system users are removed from the system.

SAIS and TRAC data are validated and maintained through a separate system and will only be shared by SAMSHA with the CSEDS contractor. Data validations are in place for the 18 month data abstraction submission to ensure accuracy in formatting. Re-arrest dates, revocation of probation/parole dates, recommitment dates, and/or risk assessment scores are grantee supplied and can be scanned for accuracy against entry into the program submitted through corresponding GPRA data. These data can't be used to identify an individual.

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

Users:

Grantees will be able to download their data uploaded into the CSEDS. They will not have access to PII in the system (e.g., see other user names or email addresses)

Contractors:

For quality control of the data collected for the system.

Others:

grantees have access to employment status as they are responsible for entering the information into a separate SAIS/TRAC reporting system.

BHTCC grantees have access to the re-arrest, revocation, and recommitment dates as well as risk scores because they enter it into the CSEDS. These data can't be used to link to any individual in the CSEDS.

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

PII information will only be used to provide access to the system and provide user support. General Administrative users of the system have access to name and email address information in order to manage the administration of data collection activities and provide related technical support. The process for survey administrations includes contractor staff receiving the names and email addresses of potential respondents, loading that information to the secure SQL Server database, creating unique and random, encrypted password combinations and creating/managing survey invitations and reminders via email. Only administrative staff at the contractor that require name and email address information in order to manage Web-based survey administration have access to name and email information. No other users of the system have access to this information.

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 is restricted to contractors that will provide user/system support. CSEDS has 4 levels of users. Only General Administrative users have access to PII (name and email address) in order to complete their job responsibilities. This access level can only be granted by the system administrator and requires approval from the project director. Other users of the system do not have the ability to grant this level of access.

Other user levels, none of which have access to PII are as follows: General Users – Have access to de-identified data and information across all grantees (typically SAMHSA and ICF data management personnel); Grantee Administrative – Have access to de-identified data and information from their grantee only and have the ability to create additional grantee users (not Admins) within their grantee. Grantee Admins can only be created by General Admins and must be approved by the project director. Grantee Users - Have access to de-identified data and information from their grantee only and do not have any admin privileges.

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.

Internal contractor training on system access and use will be conducting during the testing phase and prior to launch of the live site. All users will have certificate of completion of the HHS Records Management Training.

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

All team members will be trained on access, use, and functionality of the Community Support Evaluation Data System during the testing phase. All team members receive human subjects training.

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.

Names and emails of users will be destroyed/deleted upon three years of completion of the grant program. Names and emails of users will be destroyed/deleted upon three years of completion of the grant program. This is covered under NARA's Records Control Schedule (RCS) B311, Item 8.

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

PII will be securely stored in the CSEDS SQL server database within the SAMHSA AWS GovCloud and only be available to General Administrators after successful authentication. User passwords will be encrypted using salted password hashing. No other user level will have access to this information.