US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

03/02/2017

OPDIV:

SAMHSA

Name:

CABHI States and Communities Evaluation

PIA Unique Identifier:

P-1950937-319655

The subject of this PIA is which of the following?

Major Application

Identify the Enterprise Performance Lifecycle Phase of the system.

Planning

null

Does the system include a Website or online application available to and for the use of the general public?

Yes

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.

RTI is developing a comprehensive Web-based data collection system and data repository to support a comprehensive, cross-site evaluation of the Cooperative Agreements to Benefit Homeless Individuals (CABHI) for States and Communities grants. The Web-based data system will support submission of data through Web-based forms and batch uploads; provide secure storage of submitted data, including within SAMHSA GovCloud; allow the download of uploaded and merged data for approved users; and allow for technical assistance and data collection tracking.

The 4-year comprehensive, cross-site CABHI evaluation includes 30 grant projects across the U.S. The goal of the CABHI program is to provide access to permanent housing and supportive services for people who are chronically homeless or veterans, families, and youth experiencing homelessness with either mental health, substance use disorders, or both.

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

For grant project staff, the information includes contact information (name, work email/phone/ address) and data about CABHI project activities (e.g., service provision, evidence-based practices, collaboration) and barriers and facilitators to project implementation.

For grant project participants, the information includes demographics (date of birth, gender, race/ethnicity), military status, history of homelessness, general characteristics of housing, employment/education, behavioral health indicators, service need and receipt, and perceptions of the project .

The system will maintain user names and passwords for individuals granted access. The data are stored for the life of the contract and for any period as determined by contract and by HHS Records Retention.

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

The non-public Web-based data system will support submission of data through Web-based forms and batch uploads; provide secure storage of submitted data, including within SAMHSA GovCloud; allow the download of uploaded and merged data for approved users; and allow for technical assistance and data collection tracking.

The system users who upload data provide a valid email address, name, telephone number, and mailing address of their Grant. They are supplied with a user name and password; the password is required to be changed on first log in.

System administrators at the SAMHSA GovCloud infrastructure level are SAMHSA Division of Technology Management employees and are vetted and issued credentials by HHS. Application administrators are RTI employees who are vetted through RTI's Human Resources department and undergo background checks and other verifications, and provide a valid name, business telephone number, and business email address to SAMHSA and are provided login credentials by SAMHSA's Division of Technology Management personnel.

On-going technical assistance and data collection with grant project staff is a primary component of the evaluation, therefore staff contact information is needed. Information about the grant projects' activities and implementation allow the evaluation to describe what the projects are doing, in what context, for who, and with which barriers or facilitators. Data from grant project participants will be used to describe the participants' characteristics at an aggregated level and compare changes in outcomes (e.g., housing status) pre- and post-entry into the projects. With these data, the evaluation examines if certain project characteristics are associated with participant outcomes.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Date of Birth

Name

E-Mail Address

Mailing Address

Phone Numbers

Military Status

Employment Status

Gender

Race/ethnicity

Education status

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

People who participate in the grant project to receive services.

How many individuals' PII is in the system?

5,000-9,999

For what primary purpose is the PII used?

The PII will support a comprehensive, cross-site national evaluation of the Cooperative Agreements to Benefit Homeless Individuals for States and Communities (CABHI–States and Communities) grants. User credentials are collected to give access to individuals to allow them to enter information into the system. To support the national evaluation of grants, staff contact information for grant project staff is needed to provide technical assistance with collecting the data for the evaluation. Data from grant project participants is used to describe the participants' characteristics at an aggregated level and compare changes in outcomes (e.g., employment status) pre- and post-entry into the projects. With these data, the evaluation also examines if certain project characteristics are associated with participant outcomes.

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

Not applicable

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

Government Performance and Results Modernization Act of 2010, Section 4 & Public Health Service Act, Section 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.

Directly from an individual about whom the information pertains

In-Person

Email

Government Sources
Within OpDiv

Non-Governmental Sources
Public

Identify the OMB information collection approval number and expiration date
OMB No. 0930-0339; expiration date: 1/31/2017 (extension request in process)
OMB No. 0930-0320; expiration date: 5/31/2017 (extension request will be submitted)

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.
Project staff explain to individuals that they are collecting data that the individual will supply. If the individual does not want to participate, they do not have to.

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 can choose not to participate in the evaluation. After agreeing to participate, at any point, individuals can withdraw and refuse to complete evaluation interviews or surveys.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.
All evaluation participants give their permission prior to their participation in the evaluation data collection process. This permission process describes the process to notify individuals whose PII is in the system when major changes have occurred. We would then proceed to re-contact prior respondents using the same contact information we originally used to solicit their participation.

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 an evaluation participant believes their contact information has been inappropriately obtained by the system, used, or disclosed, they may contact their assigned evaluation point of contact and register a comment or complaint. If a complaint is registered, it will be escalated immediately through RTI management to SAMHSA's Contracting Officer's Representative (COR) and Privacy Officer for processing and resolution. RTI's Privacy Officer and processes may also be invoked to help resolve the problem. If there is a security incident, as soon as it is discovered, it would be handled under the SAMHSA-Approved CABHI system specific Incident Response Plan, and reported to SAMHSA Security, Chief information Officer, and RTI's IT Governance, Security, and Compliance as well as other designated authorities.

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 data are encrypted in transit and stored in the SAMHSA GovCloud, which is backed up on a regular schedule, and backups are stored off site in a secure facility. To ensure that the information is up-to-date and accurate, the evaluation team maintains on-going communication with the grantees and provides technical assistance with data collection. The evaluation team reviews collected data for accuracy; the evaluation team contacts the individuals to resolve any issues detected in the data. User access credentials and certification ensure data integrity is maintained.

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

Users:
Users (Grantees and SAMHSA personnel) require access to perform the duties associated with their responsibility to the government, the project role, and the grant, including data input and uploads and data analysis.

Administrators:
Access is required to perform administrative functions that include creating user accounts, closing user accounts, and assigning roles to users.

Developers:
Access is required to perform maintenance on the application code and databases for the system.

Contractors:
Access is required to carry out the needs of the evaluation, i.e., providing/documenting technical assistance and conducting data collection and analyses.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.
Contractor RTI and SAMHSA employ National Institute of Standards and Technology (NIST) 800-53 Rev 4 controls, including the Personnel Security controls, to ensure that users are appropriately identified, undergo requisite background screening, and are cleared for the risk level and sensitivity level required for their roles. In addition, RTI personnel are identified at the project level by role, and only appropriate personnel with the requisite skills and knowledge are assigned to a project in the required role.

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 CABHI system employs NIST 800-53 Rev 4 controls deployed in the SAMHSA GovCloud to ensure that access to any data is restricted by role. AC-6 requires the use of least privilege, allowing only authorized access for users that are necessary to accomplish assigned tasks in accordance with SAMHSA mission and business functions.

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.
RTI requires all personnel to complete the company-wide, IT security awareness training before obtaining authorization to access RTI's information system. RTI offers this training within 30 days of employment and a refresher course at least annually thereafter so the users can maintain their access. Additionally, RTI personnel must complete any training required by the federal client and agency they are performing work for.

Describe training system users receive (above and beyond general security and privacy awareness training).
All RTI personnel on this project take the HHS Annual Privacy Awareness Training & Information Systems Security Awareness Training, the annual HHS Records Management Training, and developers with administrative privileges are required to take the SAMHSA IT Administrator 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.
Retention of PII is governed by the National Archives and Records Administration (NARA); specifically, General Records Schedule (GRS) 1.2 and DHHS Code of Federal Regulations requires that all grant records are to be retained for three (3) years. (45 CFR 74.53 and 45 CFR 92.42).

Per the terms of the contract, at the conclusion of the contract, "All hardware, software, materials, and data produced and acquired with contract funds, or under the Contractor's control as Government Furnished Property or Materials, shall be turned over to SAMHSA or the new Contractor (as directed by the COR) in good condition."

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

Administrative: Records are maintained according to specific SAMHSA and RTI records control schedules and policy. PII is secured administratively by role-based access that limits information visibility only to those authorized to see it. Users will be required to have a username and password and will provide answers to periodic challenge questions. Technical: The PII is secured using authentication as determined by SAMHSA Division of Technology Management to a FIPS Moderate SAMHSA GovCloud environment and Secure Socket Layer (SSL) during transmission and form authentication with role-based access specific to the authenticated user. Physical: Access to the servers is protected by methods as determined and put in place by Amazon Web Services for SAMHSA's GovCloud.

Identify the publicly-available URL:

https://cabhi.samhsa.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.

Session 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?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

null