

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

12/22/2016

OPDIV:

SAMHSA

Name:

DSI Project Management and Registration Systems

PIA Unique Identifier:

P-7168297-668519

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

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The Division of Services Improvement (DSI) Project Management and Registration 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 Systems also support 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 Project Management System allows project staff to manage information on grants and grantees, as well as activities including site visits and webinars.

The Event Registration System allows grantees to register on line for project-related events such as conferences and meetings. The Project Management System is a SharePoint 2010 Web Application and the Event Registration System is a .NET 3.5 Web Application. Both systems are hosted at the JBS Data Center.

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

The Project Management System includes a Grantee Notebook maintained in an Excel Web Service spreadsheet that contains information on a grant's government project officer, authorized representative, project director, evaluator, and other project staff. Personal information maintained on these individuals with grant roles includes first and last names, organization, title, telephone number, and e-mail address. The administrative users use non-HHS assigned username and password and TOTP for multi-factor authentication login. The PII is used to authenticate user access. The PII shall be deleted after the end of the grant period.

The personal information submitted by grantees registering for project events through the Registration System includes first, middle, and last names, degrees, professional credentials, job description, title, address, telephone numbers, fax number, e-mail address, special needs, and emergency contact's name and telephone numbers. This information is used to track user registrations. The PII is deleted from the website after 60 days of event completion.

The data listed above includes all types of information collected by both systems. No other PII or non-PII is collected.

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

The DSI Project Management and Registration Sites include the DSI Project Management website and DSI event registration websites. The DSI Project Management website uses the PII to manage grants and for project-related tasks and activities including site visits and evaluations. The DSI Event Registration websites use the PII for event-related activities including registration, badge preparation, and accommodation management.

The DSI Project Management website collects first and last names, organization, title, telephone number, and e-mail address for individuals including members, owners, visitors, viewers and administrators. The PII is used to authenticate user access.

The DSI Event Registration websites collect first and last names, and e-mail address for administrators(Contractors). The PII is used to provide user access. The Registration System collects event attendees' first, middle, and last names, degrees, professional credentials, job description, title, address, telephone numbers, fax number, e-mail address, special needs, and emergency contact's name and telephone numbers. The PII is deleted from the website after 60 days of event completion.

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

Special Needs

Title

Degrees and Professional Credentials

Organization

User Credentials/Non-HHS

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

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

Vendor/Suppliers/Contractors

Those 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 DSI Project Management System uses the PII to manage grants and for project-related tasks and activities including site visits and evaluations. The DSI Event Registration System uses the PII for event-related activities including registration, badge preparation, and accommodation management.

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.

Users of the DSI Event Registration System are provided notice via email that PII will be collected for completion of registration at a DSI event. They are guided in submitting personal information as they register for events.

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 event registration are the minimum set required to verify identity and eligibility and to process registrations. Users can opt out of providing PII and register for events off-line by contacting the DSI support team using the phone number and/or email address posted on the Event Registration System and Project Management system.

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.

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 Event Registration System and Project Management system. 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 maintained in the DSI Project Management system including first and last names, organization, title, telephone number, and e-mail address is submitted and managed directly by users. The PII shall be deleted after the end of the grant period in Project Management System. PII is verified and updated by staff at JBS quarterly.

The PII maintained in the DSI Event Registration System including first, middle, and last names, degrees, professional credentials, job description, title, address, telephone numbers, fax number, e-mail address, special needs, and emergency contact's name and telephone numbers is submitted by users themselves when registering for an individual event, and not subsequently updated or used after the event. The accuracy, integrity, and sufficiency of PII is reviewed and verified as registrations are processed. The PII is deleted from the website 60 days after event completion.

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

Users:

Project staff at JBS International and SAHMSA with grant and event management roles access names, program and organization affiliation, title, professional credentials, academic degrees, address, e-mail address, phone numbers, and special accommodation needs to manage grants and event activities.

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.

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.

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 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 Project Management and Registration 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 administrator 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 Project Management System when grants expire and project management and record retention requirements are met. PII is deleted from the DSI Event Registration System when event management requirements are satisfied. SAMHSA is currently updating the records schedule for all SAMHSA systems. Once we have received the updated General Record Schedule (GRS) from the National Archives and Records Administration (NARA) the PIA will be updated accordingly.

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 will be strictly limited based on least privileges principles to authorized system administrators and DSI project staff with relevant responsibilities designated by SAMHSA and/or JBS.

Identify the publicly-available URL:

The URL of the Project Management System is

<https://dsiadolescent.jbsinternational.com>.

The Event Registration System hosts multiple URLs that are published and deleted over time corresponding to the event registration and management cycle for different events. At the time of submission, the URL,

<https://tdcgranteemeeting2016.jbsinternational.com> is active.

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?

No

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