

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/24/2016

**OPDIV:**

SAMHSA

**Name:**

Now is the Time

**PIA Unique Identifier:**

P-5142812-306431

**The subject of this PIA is which of the following?**

Major Application

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Planning

**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.**

Agency

**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.**

Now Is the Time (NITT) represents an executive action to make communities safer and increase access to mental health services by providing grants to state or local jurisdictions. NITT has 3 components, the Now is the Time - Advancing Wellness and Resilience in Education - State Education Agency (NITT-AWARE-SEA), the Now Is the Time - Healthy Transitions (NITT-HT), and the Now Is the Time - Minority Fellowship Program (NITT-MFP). The NITT-MFP has two sub-components. The Now Is the Time - Minority Fellowship Program for Youth (NITT-MFP-Y) and the Now Is the Time - Minority Fellowship Program - Addiction Counselors (NITT-MFP-AC). The purpose of these programs is improve mental health services for youth and minorities by reducing health disparities and improving behavioral health outcomes for racially and ethnically diverse populations, develop comprehensive, coordinated and integrated programs for advancing wellness and resilience in educational settings, and increase awareness about early signs and symptoms of mental health conditions, provide training, identify action strategies, and improve services and support for youth and young adults with mental health conditions.

The data collected for this system will increase awareness of mental health issues among school-aged youth, provide training for school personnel, identify successive methods to increase access to mental health services and respond to mental health issues in children and young adults in racially and ethnically diverse populations.

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

Information will be collected on staff members of national professional organizations, final year master's students in behavioral health programs as well as graduates of such programs (NITT-MFP). For NITT-MFP fellows there is an information collection of marital status, collection program director name, work email address, and work telephone. Information will be collected on youth/young adult participants, teachers and other adults who interact with children and youth, as well as grantee staff (providers, administrators) and stored/maintained within the system (NITT-AWARE, MFP and HT). The information for NITT-HT youth/young adult will include name, date of birth, mailing address, telephone numbers, and email address, and race/ethnicity as well as alternate contacts for youth/young adult participants (name and telephone number). Young adult participants in the NITT-HT grantee program will be invited to voluntarily post summaries of their experiences with the NITT-HT grant programs on a secure study website. If the young adult NITT-HT program participants so choose, these summaries could include pictures or videos of themselves. For NITT-AWARE, HT and MFP grantee staff, the system will collect and maintain name, work email address, work telephone numbers, employment information, education information, and race/ethnicity (NITT-HT only).

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

NITT will primarily use two types of data collection systems, web-based surveys and an Institutional contacting System (ICS). The web-based surveys will be hosted at RTI's (NIST) National Institute of Standards and Technology moderate network as well as on field laptops and will be used by the respondents. The ICS, also a web-based system, will be used by RTI staff and subcontractors to document all contacts with districts, schools, grantees, states and local laboratories to facilitate data collection. For NITT-MFP, the system will collect program director name, work email address, and work telephone number for grantee organizations, as well as, fellows who are final year master's students in accredited behavioral health programs, in addition to graduates of such programs, information collected will include gender, age, marital status, race/ethnicity, school information. For NITT-HT, information will be collected on youth/young adult participants as well as grantee staff and will be stored and maintained in the system. For NITT-AWARE, information will be collected on teachers and other adults who interact with children and youth, school coordinators, and grantee staff and will be stored and maintained in the system.

**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

Education Records

Employment Status

Race/Ethnicity

Employment Status (confirmation of employed or unemployed)

Education Status (un-official transcript) of school status

Marital Status (single,married,divorced,widowed)

Gender

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

Public Citizens

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

Vendor/Suppliers/Contractors

**How many individuals' PII is in the system?**

50,000-99,999

**For what primary purpose is the PII used?**

The information collected will be used to assess client experiences, develop training programs for school personnel, identify successful/non-successful action strategies, increase awareness of mental health conditions both in the minority young adult and school-aged populations, and identify barriers to implementation of mental health services in the minority, youth and school-aged communities.

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

N/A

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

Government Performance and Results Act (GPRA) Section 4: SAMHSA: 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

Online

**Government Sources**

Within OpDiv

State/Local/Tribal

## **Non-Governmental Sources**

Public

### **Identify the OMB information collection approval number and expiration date**

OMB approvals have been requested and are pending.

### **Is the PII shared with other organizations?**

Yes

### **Identify with whom the PII is shared or disclosed and for what purpose.**

#### **Within HHS**

The SAMHSA COR and designated federal staff, per contract requirements, will have access to all NITT national evaluation data. The SAMHSA COR and federal staff only access the PII for reporting purposes.

#### **State or Local Agencies**

The NITT-HT evaluation design includes plans to use program participant PII (name, date of birth, gender, and race/ethnicity) to match to state adult criminal justice records. The 17 NITT-HT state administrative data agencies will electronically match NITT-HT participants' identifiers into their management information systems to provide a datafile with criminal justice outcomes of interest (arrests, probation, jail). This will not be done without individual NITT-HT program participant consent. And, once the match has been completed, all PII will be stripped from the datafile. The NITT-HT evaluation also includes plans to allow state grantee staff to view to program participant PII (first names, photographic identifiers) voluntarily shared by interested NITT-HT young adult program participants who opt to share their experiences and satisfaction with state NITT-HT programs via the project's password protected and encrypted website.

### **Describe any agreements in place that authorizes the information sharing or disclosure.**

There are no defined agreements in place at the initial inception of the NITT programs collection.

### **Describe the procedures for accounting for disclosures.**

There is no defined metrics in place at the initial inception of the NITT program collection.

### **Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

All data collection is voluntary. Individuals consent to the in-person, web or telephone data collection.

### **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 study. After consenting to participate, at any point, individuals can withdraw from the study and refuse to complete study interviews or surveys. The individual can not access the system unless they agree to create a user name and password that collects this PII data.

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

RTI has submitted the study to RTI's Institutional Review Board (IRB) for a thorough and complete review. The IRB has determined that this study is not research in accordance with Office of Human Rights Protections definitions of "research" and therefore, consent is not necessary. Consequently, there are no processes in place to obtain formal informed consent from individuals whose PII is in the system.

However, all NITT evaluation participants will give their permission and consent prior to their participation in the evaluation data collection process. This permission process will describe 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 a NITT user believes their contact information has been inappropriately obtained by the system, used, or disclosed, the user may contact the Help Desk and register a comment or complaint. If a complaint is registered, it will be escalated immediately through RTI management to SAMHSA's 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 RTI's Incident Response Plan

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

RTI will review its processes to ensure they maintain the data's integrity, availability, accuracy, and relevancy. The PII in the system that relates to survey respondent contact information will be reviewed and updated, if needed, prior to each round of data collection. The PII that relates to contact information for school administrators will be reviewed and maintained on an ongoing basis. The NITT project team will check the accuracy of the information for the participants in the project. If there are issues noted, the project team will contact the individuals using the information they provided.

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

**Users:**

SAMHSA COR and designated federal staff will have access to PII for reporting requirements.

**Contractors:**

Only those involved with data collection or data analysis will have access to the system data. They will have all received trained on security procedures and signed nondisclosure agreements. They will require access to carry out the needs of the NITT project.

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

The project managers will review requests for access and approve only those with a need-to-know.

**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 to the system is granted using role-based access with the minimum set of access privilege levels necessary to allow individuals to do their jobs. Access privileges are controlled using network login credentials, server-specific login credentials, and security groups.

**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.**

Individuals are provided with annual information security awareness training and sign data confidentiality agreements. Survey administrators for the NITT-HT youth and young adult interviews will be trained on privacy requirements and procedures. We will develop a Rules of Behavior (ROB) specifically for the survey administrators and train them to these guidelines.

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

ITS provides IT staff members with adequate training, which may include IT security related content, to perform their assigned technical duties. Periodic training is also provided based on staff need and available budget. In addition, all ITS staff members are required to review all applicable ITS policies, standard operating procedures, and technical operating procedures within 1 month of employment.

In addition, these documents are updated as needed and are reviewed at least annually. Staff are notified via email when modifications are approved and staff are required to review the updated document.

**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.**

When the contract ends, all data will be moved to NIST Moderate archival storage where it will be retained for five years. At the end of five years it will be destroyed. GRS 1.1: Financial Management and Reporting, Item 010 and Item 011.

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

The NITT system is housed in the NIST Moderate environment, which protects the confidentiality, integrity, and availability of data through the application of administrative, technical, and physical controls that meet the appropriate SAMHSA-directed impact level of the data. Standard access security features include user identification and password, lockout of account upon repeated entry of an invalid password, file- and directory-level security, periodic backups, anti-virus software, and administrator-defined user groups. At the application level, the system uses user identification and password, lockout of account upon repeated entry of an invalid password and other security measures.

**Identify the publicly-available URL:**

While there will be two types of publicly-available websites, both are in development at this point and not accessible at this time. The URLs will be provided upon approved Authorization to Operate.

**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?**

No

**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?**

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