

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

05/25/2016

OPDIV:

SAMHSA

Name:

Prevention Management Reporting and Training System

PIA Unique Identifier:

P-9040847-614611

The subject of this PIA is which of the following?

Major Application

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?

Existing

Does the system have Security Authorization (SA)?

No

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

PIA Validation

Describe in further detail any changes to the system that have occurred since the last PIA.

There have been no functional changes to the system since the last PIA; there have only been questions added, modified, or deleted that collect grant management performance data.

Describe the purpose of the system.

The Prevention Management Reporting and Training System (PMRTS) provides a single point of access to a variety of content and core services, and offers a single sign-on to many Prevention web sites that previously required separate logins. The PMRTS will provide three separate but integrated information services: (1) Prevention Resources, a collection of materials and tools for substance abuse prevention that is organized by various topics and categories. These resources are available to the public and do not require login credentials to be accessed. (2) Data Submissions, provides CSAP contractors and grantees with the number of different data collection tools. The Substance Abuse and Mental Health Services Administration (SAMHSA) Center for Substance Abuse Prevention (CSAP) requires its contractors and grantees to submit complete and accurate data in accordance with data requirements.

This data is used for program planning and monitoring and to support funding proposals submitted to Health and Human Services (HHS), Office of Management and Budget (OMB), Congress and others, and (3) Reporting Services provides CSAP grantees and CSAP Senior Management and Project Officers with performance reports and tools to generate reports based on data provided by various CSAP programs and services.

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

For the Grantees, the PMRTS collects the Grantee Business name, address, phone number, and email address. The data collected is used to generate the user ID and temporary password for PMRTS. The grantees are individuals comprised of federal, state, local and private sector business partners that have been awarded funds for (SAMHSA) supported projects. For Grantee employees that enter data and system administrators, the PMRTS collects name, email address, and phone number - this is the only PII collected in the system. This information is provided voluntarily as part of the account creation process; and is disclosed on a need-to-know basis to project officers and grantees for purpose of account management, grant administration, and password reset.

The system itself collects generic, OMB-approved, de-identified data on the grants administered by the grantees. The de-identified data consist of gender, race, ethnicity, and age range provided in the grantee survey.

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

The Grantee Business data that is collected for user credentialing into PMRTS is updated, as needed, by the grantee for system access. This information is provided voluntarily as part of the account creation process; and is disclosed on a need-to-know basis to project officers and grant awardees for purpose of account management, grant administration, and password reset.

The PMRTS uses OMB-approved forms to collect de-identified grant performance measurement data. The information collected by the PMRTS is NOT the actual survey data but a compilation and summary of the data collected by the grantee. This data includes the type(s) of surveys used to collect the information to support the purpose of the grant, the population(s) sampled (number of people sampled with gender, race, ethnicity, and age range), the grant outcome determination criteria, and difficulties encountered in collecting the data.

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

Phone Numbers

The above 3 fields are collected for employees of the Grantees and system administrators.

HHS 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

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

PII is limited to names and business contact info for grant awardees and data entry staff at awardees' sites for password reset and account management purposes. Name and contact info is disclosed on a need-to-know basis to project officers and grant awardees for purpose of account management and grant administration.

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.

Established in conformance with the Public Health Service Act, Anti-Drug Abuse Act of 1986, the Omnibus Anti-Drug Abuse Act of 1988, and the ADAMHA Reorganization Act of 1992. The exact title of the SORN cited in Q22a is "Grants and Cooperative Agreements: Alcohol, Drug Abuse, and Mental Health Services Evaluation, Service, Demonstration, Education, Fellowship, Training, Clinical Training, and Community Services Programs."

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.

09-30-0027 (the SORN title is cited in Q21)

Identify the sources of PII in the system.

Online

Government Sources

Within OpDiv

Other HHS OpDiv

State/Local/Tribal

Non-Governmental Sources

Private Sector

Identify the OMB information collection approval number and expiration date

Please indicate the OMB collection approval number for the system

0930-0298 MAI (exp 02/29/2016) - The update to this package is being reviewed by OMB with renewal expected in March 2016.

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.

No prior notice is given since PII is voluntarily provided by applicants for business contact purposes when establishing accounts. A screen shot of the system login screen is attached with this PIA submission. There is no opt-out selection as each grantee will have to sign and agree to the privacy act notice at the system log-in screen

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.

Information is provided voluntarily by registered PMRTS users and is not shared with others or with the agency. There is no opt-out function as this basic PII information (name, phone, and email address) is necessary to set up the users account in the system.

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

There is no anticipated change to the part of the system that collects PII. The business contact information is not publicly accessible, therefore, changes to the system will not cause disclosure of this data. The owner's of the business data, Program Manager, as an example, are able to update their own contact information as needed to keep the information current. In the future, if a major change to the system is necessary that may impact PII, the impact(s) to the users will be evaluated and addressed at that time.

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.

The login screen (screen shot attached to the PIA submission) of the system instructs PMRTS users to call SAMHSA if there is a suspected security breach with their login ID and password. Before the system is launched after (ATO) Authorization to Operate approval, we will work with the (COR) Contracting Officer Representative and update this screen to provide a name and direct phone number for users to call if this occurs.

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 business contact information is constantly updated either by individuals, their organizations or by system administrators. If attempts to contact employees of grantees with PII in system are not successful, alternate contact information will be sought from SAMHSA and corrected in the system. Also, the project will be implementing a review process where the grantees will be contacted every 6 months to review and update their system users.

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

Users:

View/Update Own Data, View data of users working at a lower administrative level than themselves

Administrators:

Quality Control (To reset passwords, users will be challenged to validate themselves against the business contact info provided by the user)

Developers:

Quality Control (Through routine development processes, business contact info may be viewed)

Contractors:

Quality Control (Through routine development and testing of the system, business contact information may be viewed)

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

There are different levels of access available to users of system based on need. The SAMHSA COR determines the grantees access into the system. The system administrator has permission to set the grantee level access for each categorized group. System administrators determine user's needs based on their level of responsibility hierarchy.

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.

Several controls are applied to protect system data. Administrative controls include a security plan, contingency plan, file back-up, least privilege, and training. Technical controls include Usernames and Passwords and a firewall. Physical controls include ID Badges, Key Cards, and Closed Circuit TV (CCTV).

There are different levels of access available to users of system based on need. System administrators determine user's needs based on their level of responsibility hierarchy.

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.

Security and Privacy annual awareness training is provided by HR upon hiring and reviewed annually.

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

Since all users of PMRTS have been screened and trained on importance of security of privacy information and only selected users are given user ids and password, the users are required to acknowledge their knowledge of penalties by signing the user agreement. There is no additional security and privacy awareness training provided to the system users.

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.

Data which the PMRTS users voluntarily enter in the system in support of their prevention projects is maintained in a database server with regular system backups. It is maintained indefinitely, although users can elect to delete their accounts at any time. In this case, user data associated with those accounts is deleted by the system. The PII is retained as long as the system is fielded for system access - there is no set retention schedule. When the system is retired or inactivated, the PII will be deleted from the system. Also, while the system is fielded, users are required to change their passwords every 180 days

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

Several controls are applied to protect system data. Administrative controls include a security plan, contingency plan, file back-up, least privilege, and training. Technical controls include Usernames and Passwords and a firewall. Physical controls include ID Badges, Key Cards, and Closed Circuit TV (CCTV).

Identify the publicly-available URL:

Once launched after ATO, the URL for the site will be <https://www.pmrts.samhsa.gov/> .

The site uses session cookies for system performance and functionality. The session cookies expire after 20 minutes of system inactivity or when the user logs off the system. No PII is collected by the session cookies.

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?

Yes

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

Yes