

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

02/21/2017

**OPDIV:**

SAMHSA

**Name:**

Children's Mental Health Initiative (CMHI) National Evaluation

**PIA Unique Identifier:**

P-5810017-950010

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

Major Application

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

Operations and Maintenance

**Is this a FISMA-Reportable system?**

No

**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.**

This system will be used to conduct the National Evaluation of grants administered under SAMHSA's Children's Mental Health Initiative (CMHI). The CMHI provides support to communities to improve the organization, coordination, and delivery of children's mental health services using the Systems of Care (SOC) approach. SOC involves collaboration across agencies with youth and families to provide an array of effective, community-based and culturally and linguistically appropriate services and supports for children, youth and young adults with behavioral health challenges and their families. The purpose of the CMHI National Evaluation is to assess the success of the CMHI grants in expanding and sustaining the reach of SOC values, principles, and practices. In order to obtain a clear picture of CMHI grant activities, this longitudinal, multi-level evaluation will measure activities and performance of grantees essential to building and sustaining effective SOC's and will result in reports to SAMHSA on the CMHI program, including an annual Report to Congress.

The CMHI Information System (CMHI-IS) will support data collection for the CMHI National Evaluation. It will permit the direct web-based collection of survey information on SOC implementation data directly from grantees participants, including Project Directors, Agency Representatives, Family Representatives and other Key Partners. These surveys will describe and document grantee progress toward implementation, expansion and sustainability of the SOC approach in their communities. For these surveys, the CMHI-IS is a web based data collection system that will allow for efficient and secure administration and data storage. The CMHI-IS will also permit data entry of information collected by grantees on child and family characteristics, behavioral health symptoms and psychosocial functioning. These data, collected from administrators and directly from the children, youth, young adults and caregivers receiving services, will describe the characteristics of the service populations and the child and family outcomes of service delivery. For child and family level data, the system will serve as a secure data entry and storage mechanism for information collected directly by local grantee staff.

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

The CMHI-IS will collect and maintain consumer/client level outcome data, but will only report aggregate level results at the Grant and program levels. The consumer and client level data will be comprised of longitudinal data on child clinical and functional outcomes, family outcomes, and child and family background. Data will be collected at intake, 6-months, and 12-months post service entry (as long as the child/youth is still receiving services). Data will also be collected at discharge if the child/youth leaves services before the 12-month data collection point.

Data will be collected using the following scales for youth age five and older: A) a shortened version of the Caregiver Strain Questionnaire, B) the Columbia Impairment Scale, C) the Pediatric Symptom Checklist-17, and D) background information gathered through SAMHSA National Outcomes Measures (NOMS). Data for youth age 0-4 will be collected using the: A) Baby Pediatric Symptom Checklist; B) Brief Infant and Toddler Emotional Assessment; C) Pre-School Pediatric Symptom Checklist and d) background information from the NOMS.

Personal information is collected ONLY for SAMHSA grantees and for their collaborators on the grant for whom participating in this evaluation is a requirement of their funding - this data is used to set up user credentials. For consumers, several standard tools have been used to collect data on their experience with services; no personal information is collected for consumers.

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

Data will be collected at the system-level to examine the extent to which system-level policies, administration, financing, and monitoring reflect systems-of-care values and support systems-of-care practice at the service level across jurisdictions. Service-level data will be collected at the local agency and sector level to address client-level practice across multiple direct service providers within a community as well as child and family service experiences. Client-level data will be collected on individual child and family outcomes.

For the Grantees, the CMHI-IS will collect the Grantee Business names, address, phone number, and email address. The data collected is used to generate the user ID and temporary password for users. The grantees are individuals comprised of 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 (employees of the direct contractor), the system will collect 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 grant awardees for purpose of account management, grant administration, and password reset. Only Grantees and system administrators have access to the system; no employees of SAMHSA have access to the system.

**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

User Credentials

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

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?**

The PII is collected only to identify the grantee users of the system, and the system administrators; and is not shared with anyone.

**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.**

Comprehensive Community Mental Health Services for Children and Their Families Program  
Center for Mental Health Services, Substance Abuse and Mental Health Services Administration  
(HHS)

First authorized in 1993 under the Public Health Service Act, Part E, Sections 561-565, this program was reauthorized under the Child Health Act of 2000.

**RE AUTHORIZING LEGISLATION:**

The legislations that govern the CMHI NE. First, P.L. 102-321 (§290ff) includes the following:

§290ff-3(f) Reports to Secretary: submit a report that summarizes the services and benefits of the grant program to children with serious emotional disturbances.

§290ff-4(c) Evaluations and reports by Secretary (1) In general. Conduct evaluations that shall assess the effectiveness of the systems of care.

§290ff-4(c) Evaluations and reports by Secretary (2) Report to Congress: submit to the Congress a report summarizing evaluations carried out and making such recommendations for administrative and legislative initiatives.

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

No

**Identify the sources of PII in the system.**

Online

## **Government Sources**

State/Local/Tribal

## **Non-Governmental Sources**

Private Sector

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

0930-0349, April 30, 2018

### **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.**

Grantees are required through their grant funding by SAMHSA to report on the progress and outcomes of their activities. For all data collection, participants are provided detailed information about the purpose and content of the data collection, then asked to consent leading to informed consent. Participants are informed of their right to stop participating in the data collection at any time without any repercussions; participation is voluntary but a provision of the grant funding.

### **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/Grantees must report on the results of their grant by entering data into this system and thus cannot opt out of the collection of their PII. System administrators must provide their information for access to the system as part of their job function and also cannot opt out.

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

SAMHSA does not anticipate major changes that would require adjustment to current requirements under the current contract/task order. Data collected under the current consent agreements is held to the required/agreed consent from participants. Changes to use of data (approved by OMB), would only be applicable to 'new' data collection consent agreements and would be issued under a new contract/task order; the new contract/task order will specify the process to obtain the new consents.

### **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.**

PII is voluntarily collected only for SAMHSA grantees and for the collaborators that they report directly into the CMHI Evaluation Web site. Grantees will have direct access to the system to enter and edit PII data. Strict adherence to current security policies ensures integrity in the collection, storage and use of data with integrated measures to address and resolve non-compliance. Records are not directly retrieved by PII.

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

Semi-annual data reviews are performed by the Grantees to ensure that only approved PII is collected and retained. Consumer/client IDs are de-identified and regular checks are conducted against those identifiers and the data collected to comply with contractual requirements for data integrity, accuracy and relevancy. The system is checked on a daily basis to ensure the availability of the data.

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

**Administrators:**

User account administration and systems support.

**Developers:**

Developers have access to the Production site for systems support (deployment of new site releases, extraction and delivery of data, reporting, etc.) as approved/authorized by Data Use Agreement and the CMHI user authorization matrix.

**Contractors:**

The Administrators and Developers noted above are employees of the Contractor.

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

Access to data is based on the roles of users as authorized by the project manager and the information system manager. Granulated rights at both application and server levels utilize a responsibilities/authorization matrix ranging from public user (non-credentialed access to general information) to system administrators (full rights). Integrated system validation controls regulate access and checks are in place to monitor and enforce activation, expiration, renewal and deactivation of user accounts.

**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 PII in the system is limited by role. These roles and access are approved by the SAMHSA COR and project team.

**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.**

Privacy and Security training is provided at on-boarding. Human Subjects Protection training is provided to all personnel using the system. Annual refresher training in Privacy, Security, and Human Subjects Protection is also provided and mandatory.

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

Additional training for data collection, the use of data in analyses, and other task-specific training is provided as needed. Systems and Project personnel are also provided with annual Contingency and Incident Response 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.**

PII collected after consent of participants and as approved by contract will remain on secured CMHI Evaluation server(s) until a request is made to move/remove/transition or destroy data. Daily backup of servers follow Advanced Encryption Standard (AES) controls and corporate controls regulate restore/upgrade operations as needed. Upon completion of the contract, data will be transitioned to government possession or as directed. \* Contract does not require National Archives and Records Administration (NARA) schedules.

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

The CMHI information system is classified as a Moderate Application and all personnel (staff and contractors) and processes comply with the NIST 800-53 controls required to operate. These include; contractor Agreements, system security plan (SSP), PII policies; security awareness and training redundancy measures, backup systems, encrypted media firewalls, encryption, intrusion detection; role-based authorization and authentication with expiration and renewal limits; timeout controls for inactivity, audit logs identification and multi-factor authentication .

**Identify the publicly-available URL:**

<https://soc-eval.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?**

Yes

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

Yes