

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

04/29/2014

OPDIV:

SAMHSA

Name:

National Registry of Evidence-based Programs and Practices and websites

PIA Unique Identifier:

P-3966121-614611

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?

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?

Existing

Does the system have Security Authorization (SA)?

Yes

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

PIA Validation

Other...

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

No changes have occurred since the last PIA.

Describe the purpose of the system.

This system is designed to address SAMHSA's need to disseminate information to the public about various interventions that promote mental health or prevent or treat mental illness, substance use disorders, or co-occurring disorders. With the development of many prevention and treatment interventions, this system enables users to quickly search, sort, and narrow choices to the interventions most appropriate to their communities.

SSNs are not collected.

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

(1) Only data about mental health and substance abuse related interventions and their evaluations are collected, maintained, and disseminated. The data collected specific to a person is publicly available professional contact information including name and phone number to enable people interested in learning more about the intervention to have a contact person. This information is provided by the main point of contact. The information is added to the intervention through the back-end administrative portal and stored in the system database. Public users find this information at the bottom of each individual intervention program page.

(2) The information collected is used to disseminate evidence-based mental health and substance abuse related interventions.

(3) No federal contact related data is collected, maintained, or disseminated.

(4) The publicly available contact information is submitted by the main point of contract from the NREPP review.

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

The system provides workflow capability to approve interventions that promote mental health or prevent or treat mental illness, substance use disorders, or co-occurring disorders. Interventions approved for public release are made publicly available to all users on a website that enables users to quickly search, sort, and narrow choices to the interventions most appropriate to their communities.

The system collects information about substance abuse and mental health interventions, stores that information, and disseminates it. However, this information is not collected from the public. It is collected offline by a company hired by the government to do so. That information is evaluated and only information that meets certain standards is then entered by the company hired by the government into 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

Phone Numbers

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

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

Contacts for information on interventions.

How many individuals' PII is in the system?

100-499

For what primary purpose is the PII used?

To provide contact information.

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.

N/A

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

No

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

Online

Government Sources**Non-Governmental Sources**

Media/Internet

Identify the OMB information collection approval number and expiration date

N/A

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.

The publicly available contact information is submitted by the main point of contract from the NREPP review, so they are aware their information is being collected.

Is the submission of PII by individuals voluntary or mandatory?

Mandatory

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.

To be listed on NREPP, you have to provide contact info so that users of the registry are able to contact you. This is the whole point of the system. If no contact name/email can be provided then they cannot be listed in the registry. It is, however, up to the discretion of the program developer as to who they want to list in this "contact" section.

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

N/A

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.

Individuals self report the publicly available contact information.

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

NREPP staff update contact information on a regular basis, either because the main point of contact requests a revision to the information or because NREPP has actively asked the main point of contact if their information is still accurate and up to date.

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

to upload contact information into system

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

Contractors have access to the PII, which is publicly available contact information, in order to place it in the system so that is accessible to those seeking information on resources through the NREPP site.

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.

N/A - all the information is publicly available

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

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

N/A

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.

N/A

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

PII data, as well as all intervention related data in the system is secured and controlled in a few ways. First, data can only be read, edited, saved or deleted through a password protected administrative portal. Second, users within the administrative portal have specific user roles that limit the capacity for a user to edit, save and delete. Third, code-level security controls exist to protect the information through a standard .NET Code Access Security (CAS) Policy. Lastly, the NREPP website is hosted externally with Carpathia Hosting, Inc. which possesses a security policy that is based on a superset of NIST800.53, ISO27001 and best practices from PCI, HIPAA and SOX.

Identify the publicly-available URL:

<http://nrepp.samhsa.gov>

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