

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/13/2016

**OPDIV:**

SAMHSA

**Name:**

National Survey on Drug Use and Health

**PIA Unique Identifier:**

P-6231398-614611

**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.**

Contractor

**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

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

No significant changes have occurred since the last PIA.

**Describe the purpose of the system.**

To provide information on the incidence and prevalence of substance use and mental health as required by Section 505 of the Public Health Service Act (42 USC 290aa4). The (NSDUH) National Survey on Drug Use and Health, provides current data on substance use prevalence for the U.S. population aged 12 or older as well as each state. In this process there are surveys that are conducted in order to provide the sample supports annual direct estimates of prevalence for: the nation, the eight (8) largest states, and model-based estimates for the remaining 42 States and the District of Columbia.

These data are used by (SAMHSA) Substance Abuse and Mental Health Services Administration, the National Institute on Drug Abuse (NIDA), the Center for Disease Control and Prevention (CDC), the Office of National Drug Control Policy (ONDCP), and other the Federal and State and local (e.g., county agencies interested in the prevalence of substance use, in order to: (1) design prevention programs, (2) respond to inquiries on the extent of substance use,(3) estimate treatment need, (4) study the socioeconomic impact of substance abuse, (5) identify correlates of substance use, and (6) evaluate the overall impact that Federal and State programs have on drug demand.

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

The survey will help SAMHSA identify areas where serious substance abuse problems exist and provide assistance to States to help them develop and adopt targeted responses for those problems. The survey questionnaire asks for the minimum information necessary to meet the needs of policy makers and the substance abuse research, prevention, and treatment communities. Section 505 of the Public Health Service Act (42 U.S.C. 290aa-4) requires SAMHSA to collect this information.

The NSDUH questionnaire software collects answers to several hundred different questions about drug use (legal and illegal), health, mental health, income and other demographic characteristics (e. g., gender, age, education level, marital status, etc.). A screening performed prior to the full interview collects data items related to household demographics; number of people living at the selected dwelling unit, age, race, ethnicity, gender, relationship to the householder, and military status (active or inactive), to include administrative information related to system users for the specific purpose of managing system access. This information includes email addresses and names for system users. These system users include RTI employees, SAMHSA employees and contractor employees. Note: We do not collect email addresses from survey participants or from members of the general public.

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

The NSDUH data processing system supports the day to day operations of the National Survey on Drug Use and Health (NSDUH) project. The NSDUH is an annual nationwide survey managed by the Substance Abuse and Mental Health Services Administration and conducted under contract by RTI International. It collects and maintains screening information (household demographics) from approximately 200,000 U.S. households each year. The NSDUH data processing system also collects interview information from approximately 67,500 respondents annually across the United States. The NSDUH is the primary source of information on the prevalence, patterns, and consequences of alcohol, tobacco, and illegal drug use and abuse in the general U.S. civilian non institutionalized population, age 12 and older. The data processing system developed by RTI provides for systems to automate and manage the workflow associated with NSDUH data collection, to accurately and reliable collect NSDUH data, and to securely retrieve and store NSDUH data.

**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

Military Status  
Employment Status  
Education status  
Employment Status  
Race/Gender  
Age

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

Employees  
Public Citizens  
Vendor/Suppliers/Contractors

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

100,000-999,999

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

NSDUH data provide a useful indicator of individual States overall success at reducing youth substance abuse. In conjunction with other data sources, the survey data provide a means for assessing and improving outcomes of prevention and treatment services. In addition, many special requests for survey information emanate from the White House, Congress, and various state and local government agencies for aggregate statistical data.

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

NSDUH data are sometimes used to evaluate survey methodology and survey management techniques. The goal of these secondary investigations is to refine the operational procedures of the NSDUH and promote more efficient and more accurate survey data collection.

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

Confidential Information Protection and Statistical Efficiency Act of 2002, "CIPSEA," included as Title V in the E-Government Act of 2002 (PL 107-347). Section 505 of the Public Health Service Act.

**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 09-30-0036 and 09-30-0049

09-30-00049 Consultant Records Maintained by SAMHSA Contractors

09-30-0036 ADAMH Epidemiologic Data

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

**Directly from an individual about whom the information pertains**

In-Person  
Hardcopy  
Online

## **Non-Governmental Sources**

Public

Private Sector

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

The current OMB number for the 2016 NSDUH is 0930-0110, with an expiration date of 8/31/2017.

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

Yes

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

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

Data are shared with CDC, NIDA, ONDCP, and other Federal agencies, but PII are not shared with them. The entire NSDUH data collection includes more information than just PII.

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

There is no current or previous procedures accounting for disclosure in this system.

### **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 interviewer introduces himself/herself and the session with a consent statement. This statement will be read out loud to each interview respondent. As part of the process for obtaining informed consent, respondents are given a document, which includes information on Section 501(n) of the Public Health Service Act and the protection that it affords. Specifically, Section 501(n) states that respondents answers will only be used for research and analysis and cannot be used for any other purpose (see Children's Health Act of 2000, PL 106-310, page 70 of 146, paragraph titled: (n) Limitation on the Use of Certain Information). Beginning with the 2004 survey, the Confidential Information Protection and Statistical Efficiency Act of 2002, "CIPSEA," included as Title V in the E-Government Act of 2002 (PL 107-347), provides a uniform set of confidentiality protections to all individually identifiable data collected for statistical purposes under a pledge of confidentiality.

### **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 who object to collection or use of their PII can opt not to participate in the survey. Participation in the survey, and provision of any PII, is completely voluntary.

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

If major system or data usage changes invalidate informed consent agreements with past respondents, we will notify any/all responsible Institutional Review Boards (IRBs). Based on IRB guidance we would then proceed to re-contact prior respondents using the same contact information we originally used to solicit their participation, and notify them of the changes that had been made. If appropriate, we would also seek their consent for continued use of their PII 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.**

We honor the wishes of any individual who asks that their information be removed from our NSDUH data sets. All information pertaining to that individual is completely and permanently removed from all NSDUH data files. On average, less than one person per year asks to have their information removed from NSDUH data sets. It is a rare occurrence, but we honor these requests when they occur.

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

Because the NSDUH survey does not attempt to track, locate or re-contact past respondents, it is not essential that previously collected PII be updated or otherwise modified after it is collected. To help ensure the integrity, availability and accuracy of current PII data items, a comprehensive IT Security Plan is maintained for the system. That plan is designed to maintain compatibility with National Institute of Standards and Technology (NIST) 800-153 set of baseline security control set for the Federal Information Processing Standards (FIPS)-low security environment. The plan is reviewed and updated annually or more often if dictated by significant system changes. Also, an IT security self-evaluation is performed annually to examine the effectiveness of the current security control set, as well as the accuracy of the security documentation. A formal IT security certification and accreditation (C&A) is performed every three years, and continued system operation is authorized based on the results of that C&A.

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

**Administrators:**

Development and maintenance. The PII data items in question are held in relational databases that underpin various data processing systems used to create analytic data sets and automate workflow on the NSDUH project.

**Developers:**

Development and maintenance. The PII data items in question are held in relational databases that underpin various data processing systems used to create analytic data sets and automate workflow on the NSDUH project.

**Contractors:**

Development and maintenance. The PII data items in question are held in relational databases that underpin various data processing systems used to create analytic data sets and automate workflow on the NSDUH project.

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

Access to PII is limited to individuals who have undergone and passed IT security training, Confidential Information Protection and Statistical Efficiency Act (CIPSEA) compliance training, and who have signed data confidentiality agreements on file.

**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 PII is granted on a need to know basis and with the minimum set of access privilege levels necessary to allow people 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.**

Privacy and Security Training, CIPSEA Training to include with the HHS records management training.

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

1. Privacy and Security Training
2. CIPSEA Training – Training on the requirements of the Confidential Information Protection and Statistical Efficiency Act, including the penalties associated with violation of CIPSEA regulations.

**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.**

We utilize NSDUH Quality Control (QC) forms (containing first names and phone numbers for respondents who complete NSDUH interviews) for a given study year are shredded one year following the end of that study year.

Further, we construct segment kits (containing addresses of potential NSDUH respondents) for a given study year are shredded 2 years after the end of that study year.

Other PII may be retained for longer periods, as required by ongoing analytic needs. All retained PII must be secured using the full set of security controls used to secure the survey data for the current study year.

There GRS schedule is currently being updated and we will provided the new schedule once approved.

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

The NSDUH system is currently hosted at RTI international, on RTI's FIPS-Low network infrastructure. RTI's network security controls protect 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 (currently FIPS-Low, soon transitioning to FIPS-Moderate). 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 NSDUH 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:**

<https://nsduhweb.rti.org>

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?**

No