

Copy PIA (Privacy Impact Assessment)

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Please select the user, who would be submitting the copied PIA.

Instructions


Review the following steps to complete this questionnaire:

- 1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.
- 2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.
- 3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.
- 4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

Acronyms

ATO - Authorization to Operate
CAC - Common Access Card
FISMA - Federal Information Security Management Act
ISA - Information Sharing Agreement
HHS - Department of Health and Human Services
MOU - Memorandum of Understanding
NARA - National Archives and Record Administration
OMB - Office of Management and Budget
PIA - Privacy Impact Assessment
PII - Personally Identifiable Information
POC - Point of Contact
PTA - Privacy Threshold Assessment
SORN - System of Records Notice
SSN - Social Security Number
URL - Uniform Resource Locator

General Information

PIA Name:	SAMHSA - GRHPSS - QTR3 - 2023 - SAMHSA1442857	PIA ID:	3170893
Name of Component:	SAMHSA - Grants Review and Honorarium Payment Support System	Name of ATO Boundary:	Grant Review and Honorarium Payment Support System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	721
Submission Status:	Submitted	Submit Date:	6/10/2025
Next Assessment Date:	N/A	Expiration Date:	1/1/2100
Office:	SAMHSA	OPDIV:	SAMHSA
Security Categorization:	Moderate	OpDiv PIA ID:	SAMHSA1442857
Legacy PIA ID:		Make PIA available to Public?:	Yes
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
4:	ATO Date or Planned ATO Date.		10/19/2022
5:	Is the system or electronic information collection, agency or contractor operated?		Agency

PTA

PTA

PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	There has been one change; the server was moved from AWS (Amazon Web Services) government cloud to AWS commercial cloud
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA - 4:	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.	The system collects and stores grant reviewer PII (Personally Identifying Information) including name, phone, email, social security number (SSN), address, bank routing number, and bank account number that is uploaded to Box.com by the grant reviewer. The contractor retrieves that data on the AWS (Amazon Web Services) Server, stores it, and enters it into the QuickBooks accounting system. Weris receives an Excel file from SAMHSA (Substance Abuse and Mental Health Administration) with a list of payments and amounts to be made to the grant reviewer for the reviewer's work on a Notice of Funding Opportunity (NOFO). QuickBooks is used to prepare files in Excel and transformed into text files for ACH (Automatic Clearing House) direct deposit to M&T Bank, using the ws_ftp application. Annually, reports are run in QuickBooks for the creation of 1099 tax forms that are sent to the grant reviewer and the Internal Revenue Service (IRS). Additionally, technical editors use Box.com for the distribution, writing and editing, and submission of summary statements.
PTA - 5:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	The data collected includes W-9 tax forms and direct deposit forms filled out by the grant reviewer, which include name, address, phone, email, SSN, bank routing number, bank account number, and type of account (checking or savings). The information is stored in Portable Document Format (PDF). Next, the contractor receives, and stores Excel files uploaded by SAMHSA with amounts to pay the grant reviewer for each NOFO. This information is stored on Box.com as well as within QuickBooks. The Excel and text files prepared for ACH direct deposit to M&T Bank are stored in a folder on the AWS server. The information will be maintained for the length of the contract (2019 – 2024).
PTA - 5A:	Are user credentials used to access the system?	Yes
PTA - 5B:	Please identify the type of user credentials used to access the system.	<p>HHS User Credentials</p> <ul style="list-style-type: none"> HHS/OpDiv PIV Card HHS Email Address HHS Username Password <p>Non-HHS User Credentials</p> <ul style="list-style-type: none"> Password Email Address CAC Card
PTA - 6:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.	SSNs are collected to provide annual 1099 tax forms and filings to the IRS. In addition, bank routing and account numbers are used to send to M&T Bank for ACH direct deposits to a grant reviewer's account.
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes

PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
PTA - 8:	Does the system include a website or online application?	Yes
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	No
PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	https://account.box.com/login . Only Users who are added to the Box.com account have access to this URL (Uniform Resource Locator) for log in. Users access the account via an email address and password they create. Users who have access are: Weris employees (i.e., Writers/Editors, Portfolio Manager, Accountant, Data Analyst) and Reviewers as needed for them to upload their W-9 and Direct Deposit forms.
PTA - 10:	Does the website have a posted privacy notice?	Yes
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	Yes
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Web bug/beacons - Collect PII Session Cookies - Collect PII Persistent Cookies - Collect PII
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	
PTA - 19B:	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	

PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA

PIA		
PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Social Security Number Name Email Address Phone numbers Taxpayer ID Mailing Address Financial Account Info
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	501 - 2000
PIA - 4:	For what primary purpose is the PII used?	The PII (Personally identifiable information) is used for direct deposit payment of honorariums as well as 1099-MISC processing with the IRS (Internal Revenue Services).
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Not Applicable
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	We need reviewers' Social Security Number (SSN) in order to file their annual 1099 tax form, per IRS guidelines
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	E.O 9397
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	e 5 USC 301, Departmental regulations
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	HHS Username, HHS Password, Username. Email address
PIA - 8B:	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	The SORN for this system is 09-30-0027 - https://www.federalregister.gov/documents/2010/05/20/2010-12147/privacy-act-of-1974-report-of-systems-of-record-notices
PIA - 9:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Phone Email Online
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	

PIA - 10B:	Identify the OMB information collection approval number expiration date.	
PIA - 10C:	Explain why an OMB information collection approval number is not required.	Information is not obtained from the public
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	No
PIA - 11A:	Identify with whom the PII is shared or disclosed.	
PIA - 11B:	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
PIA - 11C:	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	
PIA - 11D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	There is no opt-out because we need the information to pay the reviewers for their work.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained.	RIVIT will always notify the relevant individuals in writing and via email in advance of any major changes. RIVIT will obtain these individuals' written consent. RIVIT will send all required individuals a form summarizing the system changes, including a fillable field for signatories to confirm consent.
PIA - 15:	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 no process exists, explain why not.	The RIVIT management team and the SAMHSA (Substance Abuse and Mental Health Services Administration) Contract Operating Representative's office will handle concerns as needed. Individuals may raise concerns via phone call, email, or written mail. Once received, RIVIT will meet with the Contract Operating Representative to review, validate, and analyze the case to understand the root cause. RIVIT will hold a conference call with the individual in question to summarize and confirm their stated concern and propose a resolution. Upon the conclusion of the conference call, RIVIT will summarize the conversation and send the summary to the individual for review and consent.

PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not.	We have an annual review of GRHPSS (Grants Review and honorarium Payment Support System) and maintain a "least information possible" system, whereby only people who need the information have access. For example, only four people have SAMHSA Government Furnished Equipment, and only two of those four could obtain PII using GRHPSS. Reviewers receive an email for each review letting them know that their direct deposit information will be used, and to reach out to update their information if necessary.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators Contractors
PIA - 17A:	Select the type of contractor.	HHS/OpDiv Direct Contractors
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Administrators: To generate payments and tax forms Contractors: Developer is a direct contractor, who accesses the system to configure and test the system
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The only people who have access to the PII are our payment processors. We restrict access to PII to only those individuals who need it to fulfill contract obligations, such as payment processing.
PIA - 20:	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.	We do not collect unnecessary PII and thus receive the minimum amount of information to fulfill our contract obligations.
PIA - 21:	Identify the general security and privacy awareness training provided to system users (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.	We comply with SAMHSA training, and our GRHPSS users have all completed the SAMHSA Cybersecurity Awareness and Records Management training, as well as the HHS Rules of Behavior.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	One-on-one hands-on training with the systems and processes between the payment processors and management during regular payment processing requests and as needed.
PIA - 23:	Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	General Records Schedule (GRS) 3.2. Item 010, Disposition Authority: DAA-GRS-2013-0006-0001. Destroy 1 year(s) after system is superseded by a new iteration or when no longer needed for agency/Information Technology (IT) administrative purposes to ensure a continuity of security controls throughout the life of the system. RIVIT will conduct regular meetings to review the relevancy of records in the system and will destroy records on an ad hoc basis as needed. For example, if a user is no longer active.

PIA - 24:

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

Administrative – only those who need SAMHSA GFE (Government Furnished Equipment) (or backups to those roles) have SAMHSA GFE. User Identification (ID)'s and Passwords are maintained by Admins only and are updated regularly.
 Technical – only two individuals can access PII.
 Physical – SAMHSA laptops are only used in employee's private spaces or the RIVIT office. They are not used on public WiFi (Wireless Fidelity) or other networks.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:

Approved

Privacy Analyst Review Date:

6/18/2025

Privacy Analyst Comments:

Privacy Analyst Days Open:

SOP Review

SOP Review Status:

Approved

SOP Signature:

SOP Comments:

SOP Review Date:

6/18/2025

SOP Days Open: 8

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	6/26/2025
Agency Privacy Analyst Review Comments:	<p>Reviewer: Nestor Villafuerte</p> <p>6/26/2025 All comments have been addressed. This PIA is ready for SAOP review and approval.</p> <p>SAMHSA's Responses to comment.</p> <p>PTA 5 - New contract dates are (2025-2030).</p> <p>PTA 12A - No boxes should be selected at all. This was an error.</p> <p>PIA 14 - RIVIT Alliance is the name of the company.</p> <p>PIA 8A - Full Name, address, phone number, email address, SSN or EIN, bank routing number and bank account number</p> <p>6/5/2025 Emailed SAMHSA on 5/21/2025 in regards to obtaining clarification on some of the responses o the PTA/PIA. Received SAMHSA response today (6/5/2025). I'm returning the PIA back to SAMHSA for updates and have included the comments I sent in the previous email (see below).</p> <p>These updates must be clarified and updated on the next iteration of the PTA:</p> <p>PTA-5: states "The information will be maintained for the length of the contract (2019 – 2024)." Is the contract still in affect (ongoing)?</p> <p>PTA-12A: states</p> <ul style="list-style-type: none">• "Web bug/beacons - Collect PII• Session Cookies - Collect PII• Persistent Cookies - Collect PII" <p>Does the above website measurement and customization technologies collect PII? Or was the selection made in error and the correct selection should have been as follows?:</p> <ul style="list-style-type: none">• Web bug/beacons – Does Not Collect PII• Session Cookies – Does Not Collect PII• Persistent Cookies – Does Not Collect PII <p>PIA-8A: Please clarify which PII element can be used to retrieve a record from a search or inquiry (i.e., name, SSN, etc.). The response provided does not address the question but tell how we access the system.</p> <p>PIA-14: Is RIVIT an acronym or the name of a company?</p>	Agency Privacy Analyst Days Open:	8

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature Page.docx
SAOP Comments:	Approved on behalf of the SAOP	SAOP Review Date:	6/26/2025
		SAOP Days Open:	0

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
RE_SAMHSA - GRHPSS - QTR3 - 2023 - SAMHSA1442857.pdf	219873	.pdf	6/5/2025 8:53 AM	1

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 8B	Data Feed Service, piafrmos_Release	5/13/2025	The SORN for this system is 09-30-0027 - https://www.federalregister.gov/documents/2010/05/20/2010-12147/privacy-act-of-1974-report-of-systems-of-record-notice	
PIA - 17B	Data Feed Service, piafrmos_Release	5/13/2025	Yes, they do.	
PIA - 1	VILLAFUERTE, NESTOR	5/19/2025	On the next iteration of the PTA please revise the following: PTA-4: Revise beginning of the response to read "The Grant Review and Honorarium Payment Support System (GRHPSS) collects and stores grant reviewer PII..." PTA-5: Please update the last sentence as the contact expired in 2024 PTA-6: Please add the following sentence to the beginning of your response: "The system collects and stores grant reviewer PII (Personally Identifying Information) including name, phone, email, social security number (SSN), address, bank routing number, and bank account number that is uploaded to Box.com by the grant reviewer. The contractor retrieves that data on the AWS (Amazon Web Services) Server, stores it, and enters it into the QuickBooks accounting system."	
PIA - 14	VILLAFUERTE, NESTOR	5/19/2025	Please define RIVIT at the first instance.	

PIA - 8A	BLAND, CRYSTAL	5/21/2025	Please clarify which PII elements can be used to retrieve a record from a search or inquiry (i.e., name, SSN, etc.). The response provided does not address the question but tell how we access the system.
PIA - 1	BLAND, CRYSTAL	6/5/2025	<p>These updates must be clarified and updated on the next iteration of the PTA:</p> <p>PTA-5: states “The information will be maintained for the length of the contract (2019 – 2024).” Is the contract still in affect (ongoing)?</p> <p>PTA-12A: states</p> <ul style="list-style-type: none"> • “Web bug/beacons - Collect PII • Session Cookies - Collect PII • Persistent Cookies - Collect PII” <p>Does the above website measurement and customization technologies collect PII? Or was the selection made in error and the correct selection should have been as follows?:</p> <ul style="list-style-type: none"> • Web bug/beacons – Does Not Collect PII • Session Cookies – Does Not Collect PII • Persistent Cookies – Does Not Collect PII
PIA - 14	BLAND, CRYSTAL	6/5/2025	PIA-14: Is RIVIT an acronym or the name of a company?
PIA - 1	Data Feed Service, piafrmos_Release	6/10/2025	<p>PTA 5 - New contract dates are (2025-2030).</p> <p>PTA 12A - No boxes should be selected at all. This was an error.</p> <p>PIA 14 - RIVIT Alliance is the name of the company.</p> <p>PIA 8A - Full Name, address, phone number, email address, SSN or EIN, bank routing number and bank account number</p>

Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ? :	0
		Is SOP Return ?:	0
Is Agency Privacy Analyst Approve ?:	1	Is Agency Privacy Analyst Return ?:	0
Is SAOP Approved?:	1	Is SAOP Return ?:	0
Total Approved:	4	Total Return:	0
Total Approval Required:	4		

Miscellaneous Fields

Last Updated:	6/26/2025 1:48 PM	History Log:	View History Log
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