




## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

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

<b>PIA Name:</b>	SAMHSA - MFPC - QTR2 - 2023 - SAMHSA1403499	<b>PIA ID:</b>	2186021
<b>Name of Component:</b>	SAMHSA - SAMHSA - SAMHSA - Minority Fellowship Program Coordinating Center	<b>Name of ATO Boundary:</b>	Minority Fellowship Program Coordinating Center
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	502
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	9/5/2024
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	9/23/2027
<b>Office:</b>	SAMHSA	<b>OPDIV:</b>	SAMHSA
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	SAMHSA1403499
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>2:</b>	Is this a FISMA-Reportable system?		Yes
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
<b>4:</b>	ATO Date or Planned ATO Date.		8/8/2022
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Contractor

## PTA

<b>PTA</b>		
<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	No changes have occurred since the last Privacy Impact Analyses.
<b>PTA - 3:</b>	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 Minority Fellowship Program Coordinating Center (MFPC) website is an online community site built to provide an array of support services exclusively for current and former Minority Fellowship Program (MFP) Fellows, their SAMHSA (Substance Abuse and Mental Health Services Administration) Minority Fellowship Program Grantee organizations, and SAMHSA. Through this site SAMHSA provides professional networking and career advancement opportunities as well as academic resources that bolster the success of Minority Fellowship Program participants as they move from their academic training into professional life. The Minority Fellowship Program community of Fellows consists of nurses, psychiatrists, social workers, addiction counselors, marriage and family therapists, psychologists, and certified counselors. Through the features of the Minority Fellowship Program Coordinating Center website, SAMSHA promotes peer-to-peer communication, mentoring, and networking opportunities that are essential to career growth. And since the career paths of the individuals funded by the Minority Fellowship Program are the outcomes that SAMSHA uses to measure the impact of the program, elements of the Minority Fellowship Program Coordinating Center website are designed to keep former Fellows engaged with SAMHSA for the duration of their careers.

**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 Minority Fellowship Program Coordinating Center annually collects both PII (Personally Identifying Information) and Non-PII data.

MFP Fellow Profile housed in the Minority Fellowship Program Coordinating Center Data Tracking Portal:

The Minority Fellowship Program Coordinating Center collects PII data in the MFP Fellow Profile. Annually each grantee organization provides the MFPC with a basic dataset (PII data) for each new MFP Fellow. This initiates the creation of a Minority Fellowship Program Fellow profile account. Once the new account is established, fellows can log in and add other Non-PII data to complete their profile.

PII Data -The PII data fields collected are Name; E-mail Address; Phone Number, Employment Status and Mailing Address.

Non-PII Data – The fellow profile account may contain other non-PII data collected from fellows that further describes the fellow’s educational and career profile and demographic indicators. Other non-PII data fields include information on race and ethnicity; gender; current university; behavioral health discipline and specialization; degree obtained or pursuing; graduation date; degree level; publications; professional picture; fellowship status; name of sponsoring MFP grantee, etc.

PII Data - The only PII data field collected from former Minority Fellowship Program fellows is Employment Status. The employment status helps the program assess if Minority Fellowship Program sponsored fellows are currently working to serve underserved ethnic minority populations.

Data collected from administrators, developers, and contractors to grant access to Minority Fellowship Program Coordinating Center System:

PII Data - E-mail Addresses are collected from administrators, contractors, and developers to issue user ids and passwords for access to the Minority Fellowship Program Coordinating Center system. PII collected from users/system administrators to access the system consists of user credentials (i.e., username, password, Personal Identity Verification (PIV) card and/or email address). Users/system administrators include SAMHSA employees (using HHS user credentials only, specifically HHS email address) and contractors (using The MayaTech Corporation email address).

Non-PII Data – No non-PII data is collected for this purpose.

**PTA - 5A:**

Are user credentials used to access the system?

Yes

<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	<p>Non-HHS User Credentials</p> <p>Username</p> <p>Password</p> <p>Email Address</p>
<b>PTA - 6:</b>	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.	<p>The data elements stored in the Minority Fellowship Program Coordinating Center database is used in a number of ways. One way is to provide the basis for individual user profiles that can be used by system algorithms (or users themselves) to identify fellows with common research areas or subject matter interest. SAMHSA and the Grantee organizations can use the email address, physical address, or telephone number to contact current and former Fellows with regard to outreach opportunities in their area, or announcement. The Minority Fellowship Program Coordinating Center database uses email addresses to authenticate users, and also as the primary means of contact for informing users of new Minority Fellowship Program Coordinating Center content, newsletter distribution, upcoming training events, and the annual survey. PII collected from users/system administrators in order to access the system, consists of user credentials (i.e. username, password, and/or email address). Users/system administrators include SAMHSA employees (using HHS (Health and Human Services) user credentials only, specifically HHS email address) and contractors (using The MayaTech Corporation email address).</p>
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	No
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	Yes

<b>PTA - 9:</b>	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.	The Minority Fellowship Program Coordinating Center (MFPPCC) Web site is an online community site built to provide an array of support services exclusively for current and former Minority Fellowship Program (MFP) Fellowships, their SAMHSA Minority Fellowship Program Grantee organizations, and SAMHSA. Through this site SAMHSA provides professional networking and career advancement opportunities as well as academic resources that bolster the success of Minority Fellowship Program participants as they move from their academic training into professional life. The Minority Fellowship Program community of Fellows consists of nurses, psychiatrists, social workers, addiction counselors, marriage and family therapists, psychologists, and certified counselors. Through the features of the Minority Fellowship Program Coordinating Center website, SAMSHA promotes peer-to-peer communication, mentoring, and networking opportunities that are essential to career growth. And since the career paths of the individuals funded by the Minority Fellowship Program are the outcomes that SAMSHA uses to measure the impact of the program, elements of the Minority Fellowship Program Coordinating Center website are designed to keep former Fellows engaged with SAMHSA for the duration of their careers.
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	Yes
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	Yes
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies - Does Not Collect PII
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	
<b>PTA - 13B:</b>	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?	
<b>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	
<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government websites external to HHS?	
<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	

<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	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?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	No
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

<b>PIA</b>		
<b>PIA</b>		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Mailing Address Employment Status User Credentials
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Employees/ HHS Direct Contractors Grantees Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	501 - 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	The Personally Identifying Information (PII) is used to allow fellows to interact and identify with one another for networking purposes based upon common factors such as professional discipline, areas of professional interest, alma mater, or geographic location. The PII information is also used by Substance Abuse and Mental Health Services Administration to distribute information about the Minority Fellowship Program to current fellows and alumni.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	Long-term tracking of the career paths and geographic spread of Minority Fellowship Program (MFP) participants; as well as analysis or program recruiting success patterns regarding schools and demographics. The PII stored within the system is essential to SAMHSA's ongoing ability to remain in contact with MFP Fellows as they move through their professional careers. Being able to track professional and job placement helps SAMHSA assess if the MFP is meeting its goals and objectives. As their jobs and geographic locations change, the ability to stay in touch with the MFP Fellow or alumni may rest largely upon having multiple means of contact (email, telephone, physical mailing address).

<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	
<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	Sections 520A, 516 and 509 of the Public Health Service Act and Government Performance and Results Act (GPRA); 5 United States Code 301 Department Regulations and the 21st Century Mental Health Cures Act.
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	Data records may be retrieved via the Fellow's name or state.
<b>PIA - 8B:</b>	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.	09-30-0027 Grants and Cooperative Agreements: Alcohol, Drug Abuse, and Mental Health Services Evaluation, Service, Demonstration, Education, Fellowship, Training, Clinical Training, and Community Services Programs (Health and Humana Services/Substance Abuse and Mental Health Administration/Operating Agency)
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Non-Government Sources Members of the Public Private Sector Other
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
<b>PIA - 10A:</b>	Provide the information collection approval number.	Office of Management and Budget (OMB) Control Number: 0930-0304
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	3/31/2027
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	Private Sector Within HHS
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	Grantee organizations can use the email address, physical address, or telephone number to contact current and former Fellows with regard to outreach opportunities in their area, or announcement. The MFPC system is contractor-hosted and MayaTech staff perform administrative , monitoring, and maintenance tasks.
<b>PIA - 11C:</b>	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)).	None
<b>PIA - 11D:</b>	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.	The system has an audit trail for user activities.

<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
<b>PIA - 13:</b>	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.	The MFPC Website provides users with a total optout feature that will exclude their records from any search of the MFP database. This feature is enabled by default, and users must opt-in for their profiles to be reachable.
<b>PIA - 14:</b>	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.	By virtue of accepting the MFP Fellowship, participants agree to have their PII collected. Updates to the collected PII are primarily obtained through surveys of the current and former fellows as initiated by SAMHSA or the grantee organizations. System announcements will be posted on the login page for each user should there be significant changes in MFPC policy regarding data access policies. Additionally, upon receiving a fellowship grantee organizations inform fellows that they will have a fellow profile established in the SAMHSA MFPC database
<b>PIA - 15:</b>	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 MFPC site provides fields for user feedback, which are passed along to appropriate May Tech Corporation (MTC) project managers and/or the SAMSHA Contract Officer Representative (COR) as appropriate. Any concerns about PII data are addressed by program managers. For assistance individuals can contact: Minority Fellowship Program Coordinating Center The MayaTech Corporation 8401 Colesville Road, Suite 430 Silver Spring, MD 20902 Phone: 301.587.1600 Fax: 301.587-1524 Email: mfpcc@mayatech.com.
<b>PIA - 16:</b>	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.	All MFPC data maintained within the system will undergo quarterly data integrity assessments to ensure overall integrity, availability, accuracy, and relevancy. In addition, the system frequently sends out program related email blasts and when emails are returned this triggers the MayaTech system administrator to contact the MFP grantees to obtain updated accurate contact information (PII data) for those MFP fellows that had returned emails.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes

<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Grantees have access to contact information for networking purposes. The MayaTech Staff (admins, developers, contractors) host and maintain the system.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	System users have access to PII data in accordance with their roles above. Only staff approved to work on the project by the SAMHSA COR and the May Tech Corporation (MTC) Project Director serve as administrators and developers with access to PII data. All contractor staff work under MTC's written policy guidelines with regard to the handling of client information, and each receives annual Health and Human Services records management training
<b>PIA - 20:</b>	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.	Access to PII is governed by the principal of least privilege and in accordance with role-based access rights (fellows, administrators, developers, contractors, etc.). Furthermore, the default profile for each user (fellow) is hidden unless the user decides to make their profile searchable. Furthermore, each user determines how much information is shared under their profile. The default profile for each user is hidden unless the user decides to make their profile searchable by other fellows. System administrators, and developers require full access to each participant's profile to effectively manage the content on the site.
<b>PIA - 21:</b>	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.	All MTC and SAMHSA staff receive annual records management and security procedure training. MTC staff working on SAMHSA projects all receive annual records management and IT security training from HHS. Additionally, all MTC staff must sign a Code of Conduct agreement as a condition of their employment. This agreement governs confidentiality and appropriate use of client materials for all MTC staff
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	SAMHSA periodically host webinars designed to educate MFP participants and system users about the features of the MFP Coordinating Center web site and its many uses.

**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).

All records are stored electronically in a secured Structured Query Language database server. Records are not destroyed. Records are maintained on current and former MFP fellows for as long as it is necessary to track their career efforts. When fellows complete the program, we follow their career progress as behavioral health professionals. This is essential to measuring the long-term impact of the MFP. The records are currently being maintained under General Records Schedule (GRS) 1.2, 010 Grant and Cooperative Agreement Program Management Records. The MFPC (Minority Fellowship Grant Coordinating Center) database/dataset is considered *temporary* and shall be destroyed when the business case ceases or the records shall be maintained up to the maximum amount of time approved by SAMHSA.

**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.

All access to the MFPC site is password based, and all user accounts are assigned permissions based on organization and role. New passwords are randomly generated by the system through the account creation/password reset modules. Changed passwords (done through an internal password reset module) are required to be between 8 and 12 characters, contain at least 1 upper and lower case character and at least 1 special character. The system uses forms authentication to grant access to the application. Access is granted based on role and the principle of least privilege. Access is granted to personnel by authorized users only. MTC maintains a list of those personnel who need access and who controls the access. Administrative controls dictate that MFP user profiles dictate which system screens and associated buttons/menus/drop down boxes/etc. are accessible. Based on each user's system profile, set by the MFP Administrator, different capabilities are available. MFP system administrator functionality of the application is logically separated from the user functionality. Users of the MFP application cannot access the administrator features because these features are handled directly by the MFP Administrator, and technical controls that require that MFP addresses all the elements of flaw remediation in the configuration and project

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	9/5/2024
<b>Privacy Analyst Comments:</b>		<b>Privacy Analyst Days Open:</b>	

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>		<b>SOP Review Date:</b>	9/9/2024
		<b>SOP Days Open:</b>	4

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	9/11/2024
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Shanai Shobowale This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	2

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	9/23/2024
		<b>SAOP Days Open:</b>	12

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 9	Data Feed Service, piafrmos_Release	9/5/2024	Other PII could be provided by MFP grantees	
PIA - 11A	Data Feed Service, piafrmos_Release	9/5/2024	SAMHSA, The MayaTech Corporation, and the Grantee organizations.	
PIA - 17B	Data Feed Service, piafrmos_Release	9/5/2024	Privacy impact assessment are conducted in accordance with FAR clause 52-239-1 and Section 208 of the E-Government Act of 2002.	
PIA - 1	BLAND, CRYSTAL	9/11/2024	Please ensure "User Credentials" are selected.	

## Admin Section

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

## Miscellaneous Fields

Last Updated:	9/23/2024 5:19 PM	History Log:	<a href="#">View History Log</a>
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