




## 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 - N-SUMHSS - QTR3 - 2023 - SAMHSA1461077	<b>PIA ID:</b>	1770606
<b>Name of Component:</b>	SAMHSA - SAMHSA - SAMHSA - National Substance Use and Mental Health Services Survey	<b>Name of ATO Boundary:</b>	National Substance Use and Mental Health Services Survey
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	217
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	2/15/2024
<b>Next Assessment Date:</b>	03/07/2027	<b>Expiration Date:</b>	3/7/2027
<b>Office:</b>	SAMHSA	<b>OPDIV:</b>	SAMHSA
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	SAMHSA1461077
<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.		10/9/2026
<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 significant changes, only minor content changes for the 2023 National Substance Use and Mental Health Services Survey ( N-SUMHSS) survey administration
<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 N-SUMHSS survey collects and stores survey data for the National Substance Use and Mental Health Services Survey (N-SUMHSS). The N-SUMHSS is a part of a broader overarching system, the Behavioral Health Services Information System (BHSIS), which is described in detail in a separate Privacy Impact Assessment.

The N-SUMHSS survey is an annual survey of mental health and substance use treatment facilities. This survey replaces separate substance use (National Survey of Substance Abuse Treatment Services-N-SSATS) and mental health (National Mental Health Services Survey N-MHSS) facility surveys, and captures information about the facilities, the services they offer, and high-level descriptions of the clients they serve.

This N-SUMHSS survey allows facilities to submit survey responses using a web-based data entry form. Ultimately the data from the system will feed SAMHSA's I-TF system (an inventory of all treatment facilities) and the online treatment locator (both also parts of the broader BHSIS system). These allow for SAMHSA, the broader behavioral health stakeholder community, and individuals needing treatment services, to understand the nature and availability of behavioral health services.

The N-SUMHSS Information Website is an online resource center that includes tools to help facilities complete the N-SUMHSS, including general information about the survey along with survey tips and tutorials.

<b>PTA - 5:</b>	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.	<p>The N-SUMHSS survey collects and maintains information from substance and mental health treatment facilities in the United States regarding services offered and annual client counts.</p> <p>The majority of the data elements in the N-SUMHSS survey are at the facility level (type of facility, location of facility, contact information for the facility, types of services offered by the facility, counts and descriptions of clients served by the facility).</p> <p>The N-SUMHSS survey stores name, phone number, and email address for facility directors and/or survey respondent, which are generally publicly available business contact information.</p> <p>The N-SUMHSS survey collects and stores respondent email primarily to enable password resets, and to facilitate contact if there are questions related to the survey. Respondent passwords are stored only as hashed values.</p> <p>The N-SUMHSS survey collects and maintains name and email address from system administrators to establish system accounts. Admin passwords are stored only as hashed values.</p> <p>The N-SUMHSS Information Website does not collect any information, it only disseminates publicly available resources.</p>
<b>PTA - 5A:</b>	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> <ul style="list-style-type: none"> <li>Username</li> <li>Password</li> </ul>

<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 majority of data in the system are facility-level data. These data are collected so that SAMHSA and the broader behavioral health stakeholder community can understand the nature and availability of behavioral health services nationwide. These data are used to populate SAMHSA's treatment locator, enabling members of the public to search for mental health or substance use treatment facilities in their area.</p> <p>Contact information for facilities are required in order to populate the treatment locator.</p> <p>Contact information for the respondent is required in order to facilitate password resets or to allow N-SUMHSS staff to follow up with respondents if there are questions about the survey response.</p> <p>Respondent credentials are collected to control access to the N-SUMHSS survey.</p> <p>Administrator credentials are collected to control access to the N-SUMHSS survey.</p> <p>No data is shared with another system.</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.	<p>N-SUMHSS Information Website</p> <p>The N-SUMHSS Information Website is an online resource center that includes tools to help facilities complete the N-SUMHSS, including general information about the survey along with survey tips and tutorials.</p> <p>The N-SUMHSS Information Website is accessible to the general public, but primarily survey respondents are directed to it via their survey invitation package.</p> <p>N-SUMHSS Information Website Users access the website via public URL - <a href="https://info.nsumhss.samhsa.gov/">https://info.nsumhss.samhsa.gov/</a></p> <p>N-SUMHSS Survey</p> <p>The N-SUMHSS survey is an annual survey of mental health and substance use treatment facilities that captures information about the facilities, the services they offer, and high-level descriptions of the clients they serve.</p> <p>The N-SUMHSS survey login page is accessible to the general public but survey access requires authentication via username and password.</p> <p>N-SUMHSS survey users access the login page of the survey via public URL - <a href="https://nsumhss.samhsa.gov/">https://nsumhss.samhsa.gov/</a></p>
<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?	No
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<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.	<p>Session Cookies - Does Not Collect PII</p> <p>Other technology - Does Not Collect PII</p>
<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
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Members of the public
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	The system collects and maintains information from substance and mental health treatment facilities in the United States regarding services offered and annual client counts. The information collected will include facility name, facility address, and facility director business contact information to create system accounts and to provide technical assistance as needed.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	None
<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.	Public Health Service Act, Section 301, "Research and Investigation" (42 U.S.C. 241).
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	No
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	
<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.	

<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Email  Online
<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.	OMB No. 0930-0386
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	3/31/2024
<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?	No
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
<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)).	
<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.	
<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.	Survey support staff maintain contact with system users as part of the normal business process, which offers users the opportunity to inform the project team of any objections. Updates to inaccurate or outdated information are typically completed within one business day of receiving the request. User credentials are necessary to permit user access to the system. However, if requested by a user, their credentials and facility information will be removed from the system, along with removal of the user's ability to access the system.
<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.	Users are notified via email if major changes occur to the system with an option to remain active or opt-out.
<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.	Survey support staff maintain contact with system users as part of the normal business process, which offers users the opportunity to inform the project team of inaccurate contact information or user credentials in the system. Updates to inaccurate or outdated information are typically completed within one business day of receiving the request. User credentials are necessary to permit user access to the system. However, if requested by a user, those credentials will be removed from the system, along with removal of the user's ability to access the system.

<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.	Facility name and contact information is periodically reviewed by Project staff throughout the year as data is available to ensure data's integrity, availability, accuracy, and relevancy. Data are reviewed when updates from respondents are received, when survey in field has ended, prior to the next annual administration, and at the time reports and files are needed. The process to review data may include automatic system checks, running skip patterns that may cause an error flag, and having project staff manually review data in line with annual administrations.
<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.	Third-Party Contractor (Contractors other than HHS 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.	Users can view their own contact information to validate its accuracy.  Administrators oversee all functions of the system, including installation, configuration, operation, maintenance of system hardware and software and related infrastructure.  Developers create, maintain, and enhance the system based on requirements, including both application and database layers.  Contractors are the project staff contracted by Substance Abuse and Mental Health Administration (SAMHSA), and they operate the system, process the data, provide technical assistance, and produce reports and data files. These staff do not have agency credentials, and therefore are not direct contractors.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	By virtue of their responsibilities, applicable system Administrators, Developers, Contractor Project staff involved in data processing, and SAMHSA Project staff are provided full access to the database that may access PII.
<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.	Permissions and privileges are granted on a per individual basis according to their assigned project responsibilities. Project staff have access to data for the purpose of creating reports and running data analysis. System administrators are given permission to ensure they can access systems for operations, maintenance, and monitoring purposes.

<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.	Health and Human Services (HHS) role-based training is provided to Behavioral Health Services Information System (BHSIS) administrators and management staff, in addition to the annual general awareness training for security and privacy that includes modules for both regular and privileged users.
<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	There is no additional training systems users receive above and beyond general security and privacy awareness.
<b>PIA - 23:</b>	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).	BHSIS uses the Personally Identifying Information (PII) retention schedule as instructed by SAMHSA. Pertinent schedules for BHSIS consist of General Records Schedules 3.2 and 4.2.
<b>PIA - 24:</b>	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.	BHSIS data is housed at a physically secure location with access to the databases and servers strictly limited to system administrators. The database is protected by a firewall. Websites log all access, and these logs are reviewed regularly. To ensure data integrity and availability, the database is backed up nightly.

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	2/15/2024
<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>	2/23/2024
		<b>SOP Days Open:</b>	8

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	2/28/2024
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Jim Laskowski This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	5

### 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>	3/7/2024
		<b>SAOP Days Open:</b>	8

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

### Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	LASKOWSKI, JAMES	2/27/2024	In the next iteration, of the PTA, please spell out I-TF on first use.	

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:	3/7/2024 12:41 PM	History Log:	<a href="#">View History Log</a>