

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 - PATH PDX - QTR4 - 2022 - SAMHSA1263961	PIA ID:	1756573
Name of Component:	SAMHSA - Projects for Assistance in Transition from Homelessness Data Exchange	Name of ATO Boundary:	Projects for Assistance in Transition from Homelessness (PATH) Data Exchange
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	437
Submission Status:	Submitted	Submit Date:	1/4/2024
Next Assessment Date:	03/01/2027	Expiration Date:	3/1/2027
Office:	SAMHSA	OPDIV:	SAMHSA
Security Categorization:		OpDiv PIA ID:	SAMHSA1263961
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.		12/22/2023
5:	Is the system or electronic information collection, agency or contractor operated?		Contractor

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.	System was redesigned to an open- source programming language with new look and feel. No major functionality changes were implemented during this time.
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 Projects for Assistance in Transition from Homelessness (PATH) Data Exchange (PDX) website is the online portal that PATH providers utilize to submit their PATH Annual Report to SAMHSA (Substance Abuse and Mental Health Services Administration). PATH program provider data is submitted to local Homeless Management Information Systems (HMIS) and then PATH providers are able to upload non-identifiable data directly from HMIS into PDX through a comma-separated values (CSV) upload process. State PATH Contacts (SPCs) review these data reports and use them to submit their PATH Annual Report to SAMHSA.

In addition to using PDX to submit PATH Annual Report data, the PDX site can also be used to submit progress reports. These Progress reports are not required by SAMHSA. It is up to the SPC whether or not the providers are required to submit progress reports. Those that do, use the reports to review data throughout the year to see the progress of each PATH project in their state or territory.

<p>PTA - 5:</p>	<p>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>	<p>The PATH Data Exchange (PDX) collects and stores yearly program performance and budget data in line with Government Reporting Performance and Results Modernization Act (GRPA) 2010, goals, results, and progress requirements. Data is collected through the online completion of PATH Annual Report Form (OMB Control No. 0930-0205, expires 8/31/2023). In addition to the yearly reporting data, the PDX system also collects and stores relevant provider information, user information, (first name, last name, email), authentication (username and password), and authorization logs to facilitate the collection of this information.</p> <p>The PDX maintains profile information for nearly 500 PATH provider agencies, 443 of which are currently active PATH providers. It also currently maintains approximately 1,000 active user accounts. PDX also contains a resource library accessible to State PATH Contacts and providers. The progress reporting section of the system allows State PATH Contacts and providers to generate state-level and provider-level data reports.</p> <p>PATH Annual report data is gathered and entered on a monthly, quarterly, or annual basis to complete monthly, quarterly progress reports and annual report requirements. The list of data elements collected annually for each PATH provider are: the total number of persons who received any PATH funded service during the current reporting period, the total number of persons contacted this reporting period, number of instances of contact, active clients who became enrolled this reporting period, the total number of services provided during this reporting time period, the total number of referrals given during this reporting time period, number of people enrolled by gender, sex, age, and ethnicity, veterans, with co-occurring disorders, in emergency various types of housing, amount of federal PATH funds and state subsidies received during the reporting year, number of staff in the provider organizations, number of full-time equivalent (FTE) of staff supported by PATH and matching funds, type of provider organization.</p> <p>Data in PDX is stored throughout the life of the grant program.</p>
<p>PTA - 5A:</p>	<p>Are user credentials used to access the system?</p>	<p>Yes</p>
<p>PTA - 5B:</p>	<p>Please identify the type of user credentials used to access the system.</p>	<p>Non-HHS User Credentials Password</p>

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.	Aggregate, non-identifiable information is gathered yearly from PATH providers to analyze the efficacy of the PATH program and utilization of PATH funds. Data collection using the PATH Annual Report Form (OMB Control No. 0930-0205, expires 8/31/2023) is a requirement of receiving PATH funds. The PDX system also collects and stores relevant provider information, user information, (first name, last name, email, agency phone number), authentication (username and password, not saved in the system) and authorization logs to facilitate the collection of this information.
PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	No
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)?	Yes
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.	<p>The purpose of the PDX system is to collect data using the PATH Annual Report Form (OMB Control No. 0930-0205, expires 8/31/2023) to analyze the efficacy of the PATH Program and utilization of PATH funds.</p> <p>Access to PDX is limited to PATH-funded providers, State PATH Contacts, SAMHSA Project Officers, and website administrators.</p> <p>Users access the website via a public URL: https://pathpdx.samhsa.gov/. They must first be registered in the system by a State PATH Contact or by the website administrators.</p>
PTA - 10:	Does the website have a posted privacy notice?	No
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?	No
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to 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.	Name Email Address Phone numbers User Credentials
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Grantees
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?	Name and Email Address are used to identify the provider who is submitting PATH (Projects for Assistance in Transition from Homelessness) data and to correspond with the user.
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	None
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Congressional Statute requires grantees to submit data for the PATH Annual Report to the PDX (Data Exchange) system. Source: Stewart B. McKinney Homeless Assistance Amendments Act of 1990 and reauthorized by Section 1218 of the Consolidated Appropriations Act, 2023 (P.L. 117-328).
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	No
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	
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.	

PIA - 9:	Identify the sources of PII in the system.	Government Sources Within the OPDIV State/Local/Tribal
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
PIA - 10A:	Provide the information collection approval number.	Office of Management Budget Control No. 0930-0205
PIA - 10B:	Identify the OMB information collection approval number expiration date.	4/30/2024
PIA - 10C:	Explain why an OMB information collection approval number is not required.	
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?	Mandatory
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.	Congressional Statute requires grantees to submit PATH Annual Report data or they risk future loss of funding. Source: Stewart B. McKinney Homeless Assistance Amendments Act of 1990 and reauthorized by Section 1218 of the Consolidated Appropriations Act, 2023 (P.L. 117-328).
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 method to opt out of the collection of PII (Personally Identifiable Information) as the only way access is granted is via user credentials (name and email address).
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.	There are no major changes to the system where these personnel would need to have additional consent obtained. In the event of a disclosure, users would be emailed.
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.	All users have access to their own PII in the system for changes or updates. If someone does not want to be part of the program any longer and wants their PII removed, they may contact a member of the Program Staff. This contact information is provided on the site.
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.	Users have access to their own PII and are relied upon to keep the information up-to-date and accurate. User credentials are updated every 60 days to maintain integrity and accuracy. If a person does not want to be part of the program any longer, their information can be made inactive or fully removed from the system depending on their desire.

PIA - 17:	Identify who will have access to the PII in the system.	Users Administrators Developers
PIA - 17A:	Select the type of contractor.	
PIA - 17B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	
PIA - 18:	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Users have access to their own data and Administrators have access for administration purposes. Developers have access for development and database administration purposes.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access to data is based on the roles of users as authorized by the project manager. Granulated rights at both application and server levels will utilize a responsibilities/authorization matrix ranging from standard user to system administrators (full rights). Integrated system validation controls regulate access and checks will be put into place to monitor and enforce activation, expiration, renewal and deactivation of user accounts.
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.	Job function determines the level of access, and users are assigned only those rights necessary to fulfill responsibilities for approved roles. System-level audit controls safeguard and audit use.
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.	Privacy and Security training is provided at on-boarding, and annual refresher training is provided and mandatory. A list is maintained and submitted to the COR (Contract Officer Representative) as requested.
PIA - 22:	Describe the training system users receive (above and beyond general security and privacy awareness training).	Additional training for data collection, the use of data in analyses, and other task-specific training is provided 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).

PII collected as approved by contract will remain on secured server(s) until a request is made to move/remove/transition or destroy data. The specific NARA (National Archives and Records Administration) Records Control Schedule (RCS) Job Numbers or General Records Schedules (GRSS) that apply to the PII maintained in the system are still to be determined. Daily backup of servers follow Advanced Encryption Standard (AES) controls and corporate controls regulate restore/upgrade operations as needed.

Per the contract, when information, data, documentary material, records and/or equipment is no longer required, it shall be returned to SAMHSA (Substance and Mental Health Services Administration) control or the Contractor must hold it until otherwise directed. Permanent electronic records shall be transferred to SAMHSA 60 days prior to period of performance expiration as prescribed in the DoD (Department of Defense) Standard 5015.2 electronic format regulation and NARA Bulletin 2014-04, Revised Format Guidance for the Transfer of Permanent Electronic Records.

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.

This system is classified as a Low Application and all personnel (staff and contractors) and processes comply with the NIST 800-53 controls required to operate. These include:

Administrative controls of:

- Contractor Agreements
- System Security Plan (SSP)
- PII policies; security awareness and training

Technical and physical controls of:

- Redundancy measures
- Backup systems
- Encrypted media
- Firewalls, encryption, intrusion detection
- Role-based authorization and authentication with expiration and renewal limits; timeout controls for inactivity
- Audit logs
- Identification and data entry cards.

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	1/4/2024
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:		SOP Review Date:	1/16/2024
		SOP Days Open:	12

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	1/19/2024
Agency Privacy Analyst Review Comments:	Reviewer: Jim Laskowski The comment have been addressed (see supporting documentation). This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	3

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Signature.docx
SAOP Comments:	Approved on behalf of Bridget Guenther	SAOP Review Date:	3/1/2024
		SAOP Days Open:	42

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
FW_ SAMHSA Projects for Assistance in Transition from Homelessness (PATH) Data Exchange (1756573) PIA .pdf	166683	.pdf	1/19/2024 10:17 AM	0

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	LASKOWSKI, JAMES	1/16/2024	Per PTA-5 the system collects username and password. Please add username and password to your response.	
PIA - 1	BLAND, CRYSTAL	1/16/2024	<p>PTA-5B: Per PTA-5 the system collect username and password but the response in PTA-5B only list password and not username.</p> <p>PTA-6: Per PTA-5 username and password are collected but in PTA-6 username and password are collected but not stored in the system.</p>	

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:	3/1/2024 3:34 PM	History Log:	View History Log
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