


Copy PIA (Privacy Impact Assessment)



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


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 - Web-BGAS - QTR2 - 2023 - SAMHSA1442602	PIA ID:	2171832
Name of Component:	SAMHSA - Web-Block Grant Application System	Name of ATO Boundary:	Web Block Grant Application System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	452
Submission Status:	Submitted	Submit Date:	8/15/2024
Next Assessment Date:	N/A	Expiration Date:	9/23/2027
Office:	SAMHSA	OPDIV:	SAMHSA
Security Categorization:		OpDiv PIA ID:	SAMHSA1442602
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)?		No
4:	ATO Date or Planned ATO Date.		1/22/2024
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.	<p>Web-Block Grant Application System (WebBGAS) has been updated to reflect the next Federal Fiscal Year's application and reporting requirements for multiple grants under the following centers/domains:</p> <ul style="list-style-type: none"> SABG CSAT (Substance Abuse Prevention and Treatment Block Grant) (Coordinated Services Action Team), SABG CSAP (Center for Substance Abuse Prevention) (including SYNAR(SYNAR is not an acronym, it is an amendment named after Congressman Mike Synar), MHBG (Mental Health Services Block Grant), PATH (Projects for Assistance in Transition from Homelessness) and PAIMI (Protection &Advocacy for Individuals with Mental Illness).
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.	WebBGAS is an online reporting system that States use to respond to the Uniform Application for the Substance Abuse Prevention and Treatment Block Grant (OMB (Office of Management and Budget)No. 0930-0080) and the Community Mental Health Services Block Grant Application (OMB No. 0930-0168).Covering all 50 States, United States territories and the District of Columbia, WebBGAS is the central portal for States to apply for Block Grant funds within SAMHSA (Substance Abuse and Mental Health Services Administration). Additionally, the system enables State Project Officers responsible for the review and approval of applications to perform their activities online. WebBGAS also offers a catalog of reports used to monitor program performance and administrative activities.
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 agency collects, maintains, and disseminates two main types of data in Webb Gas: (a) narrative data that summarizes States' progress in meeting performance measurement goals set by SAMHSA; and (b)tabular data that summarizes key performance indicators (e.g., number of persons served, planned expenditures, treatment needs assessment, intake-to-discharge aggregate outcomes).(2) WebBGAS collects and stores user /administrator information and credentials to control access to the system. Information collected includes user credentials, name, email address, and phone number.(3) Grant Applications may include the Data Universal Numbering System (DUNS) number associated with the entity requesting consideration. State Agency information may also include the DUNS number associated with the respective agency.
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.	Non-HHS User Credentials Username Password Email Address
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.	User credentials are collected to control access to the system. Contact information, such as name, phone number and email address are utilized to verify the user's identity and to communicate changes made to the system. The DUNS number, which is publicly available and carries no burden of care, is required for all organizations applying to the to the United States. Federal Government for grants. It is used to uniquely identify a business/ institution.
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.	WebBGAS is an online reporting system that States use to respond to the Uniform Application for the Substance Abuse Prevention and Treatment Block Grant (OMB (Office of Management and Budget)No. 0930-0080) and the Community Mental Health Services Block Grant Application (OMB No. 0930-0168).Covering all 50 States, US territories and the District of Columbia, WebBGAS is the central portal for States to apply for Block Grant funds within SAMHSA (Substance Abuse and Mental Health Services Administration). Additionally, the system enables State Project Officers responsible for the review and approval of applications to perform their activities online. WebBGAS also offers a catalog of reports used to monitor program performance and administrative activities.
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?	Yes
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	No
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 Other - Free text Field - DUNS
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies) Employees/ HHS Direct Contractors Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
PIA - 4:	For what primary purpose is the PII used?	The limited Personally Identifiable Information (PII) collected is considered public information (.e.g., government contact information) and is utilized for the sole purpose of account management and communication regarding system changes/status.
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.	
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.	SAMHSA: Public Health Service Act, Sections 301, (42 U.S.C. 241), 303 (42 U.S.C. 242(a)), 322 (42 U.S.C. 249(c)), 501 (42 U.S.C. 290aa), 503 (42 U.S.C. 290aa-2), 505 (42 U.S.C. 290aa-4) and 521 (42 U.S.C. 290cc-21 et. seq.). CSAP: Center for Substance Abuse Prevention, Section 515-18 (42 U.S.C. 290bb-21 et. seq.). CSAT: Center for Substance Abuse Treatment, Section 507-12 (42 U.S.C. 290bb et. seq.). CMHS: Center for Mental Health Services, Sections 506 (42 U.S.C. 290aa-5) and 520-35 (42 U.S.C. 290bb-31 et. seq.). Protection and Advocacy for Individuals with Mental Illness Act of 1986 as amended (42 U.S.C. 10801 et. seq.); Refugee Education Assistance Act of 1980, Section 501 (c) (8 U.S.C. 1522 note), P.L. 96-422; Executive Order 12341; and Disaster Relief Act of 1974, Section 413, P. L. 93-288, as amended by Section of 416 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 100-107.
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.	<p>Directly from an individual about whom the information pertains</p> <p>Email</p> <p>Online</p> <p>Government Sources</p> <p>Within the OPDIV</p> <p>State/Local/Tribal</p>
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.	Not Applicable. An Office of Management and Budget (OMB) Information Collection Number is required when collecting information from 10 or more members of the public in a 12-month period
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.	Government employees implicitly consent to the collection of their business information via requests to access the system. In order to provision user accounts, the individual must provide a name, phone number, and e-mail address associated with the user. If an individual is unwilling to provide this information, access to the system will not be granted.
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.	Users of the system are notified via e-mail utilizing the contact information established by the user during the account provisioning process.

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.	Users may contact the appropriate System Manager at Director Center for Substance Abuse Prevention Substance Abuse and Mental Health Services Administration 5600 Fishers Lane Rockville, Maryland 20857, Director Center for Substance Abuse Treatment Substance Abuse and Mental Health Services Administration 5600 Fishers Lane Rockville, Maryland 20857 or Director Center for Mental Health Services Substance Abuse and Mental Health Services Administration 5600 Fishers Lane Rockville, Maryland 20857 and reasonably identify the record, specify the information being contested, the corrective action sought, along with supporting information to show how the record is inaccurate, incomplete, untimely, or irrelevant
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.	PII is reviewed in accordance with the National Institute of Standards and Technology Special Publication 800-53 (Revision. 4) for Low systems; the SAMHSA client is responsible for reviewing user accounts every 180 days.
PIA - 17:	Identify who will have access to the PII in the system.	Administrators Developers Contractors Others
PIA - 17A:	Select the type of contractor.	Third-Party Contractor (Contractors other than HHS 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 - Administrators have access to a user's PII as defined by their role in the access control process. Developers - Developers have access to the backend database for administration and analysis purposes. Contractors - Contractors have access to the backend database for administration and analysis purposes. Others - Authorized SAMHSA personnel are required to review account requests and authorize access to the system prior to account provisioning.
PIA - 19:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The concept of least privilege is utilized for assigning roles and providing access to the system. Only administrators and authorized SAMHSA personnel with the authority to grant access approvals have access to account information.
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.	Only administrators and authorized SAMHSA personnel with the authority to grant access approvals have access to account information.

<p>PIA - 21:</p>	<p>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.</p>	<p>Administrators and SAMHSA personnel are required to complete an initial Security and Privacy Awareness training, annually thereafter, prior to being granted access to Federal systems. In addition, Health and Human Services (HHS) Rules of Behavior (RoB) for Use of HHS Information Resources must be completed and acknowledged before access to the system is granted.</p>
<p>PIA - 22:</p>	<p>Describe the training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Administrators and SAMHSA personnel are required to complete an initial Security and Privacy Awareness training, annually thereafter, prior to being granted access to Federal systems. In addition, Health and Human Services (HHS) Rules of Behavior (RoB) for Use of HHS Information Resources must be completed and acknowledged before access to the system is granted.</p>
<p>PIA - 23:</p>	<p>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).</p>	<p>Web Block Grant Application System (WebBGAS) retains system related records in accordance with National Archive and Records Administration (NARA) General Records Schedule (GRS) 3.1 and GRS 3.2 requirements.</p>
<p>PIA - 24:</p>	<p>Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.</p>	<p>Although there is business information collected and retained by the system for the purpose of account management, all of this information is publicly available and carries no burden of care relative to privacy. The WebBGAS system implements reasonable and appropriate protection measures as follows:</p> <p>Administrative - Administrative security mechanisms include regular Security Awareness Training programs as well as system monitoring to include review of system logs and actions, risk analysis and a fully realized system security plan.</p> <p>Technical - Technical security mechanisms include the appropriate logical access configurations, system disconnects due to inactivity and encryption of sensitive information in-transit and at-rest.</p> <p>Physical - Physical security mechanisms to the data center, include 5 layers of access control, including exterior guard/gate, building access control, interior guard/gate, interior card access and biometrics (hand geometry) whereby only those having regular and recurring need are afforded right of entry.</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	8/15/2024
Privacy Analyst Comments:		Privacy Analyst Days Open:	

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:	This system classifications is now Low. It was reviewed and changed recently. Have not been able to update this in the system yet. Just noting it here for awareness.	SOP Review Date:	9/4/2024
		SOP Days Open:	20

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	9/6/2024
Agency Privacy Analyst Review Comments:	Reviewer: Nestor Villafuerte 9/6/2024 This PIA is ready for SAOP review and approval.	Agency Privacy Analyst Days Open:	2

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:		SAOP Review Date:	9/23/2024
		SAOP Days Open:	17

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 22	Data Feed Service, piafrmos_Release	9/4/2024	Administrators are also required to complete Administrator Role Based Training before using the system.	
PIA - 1	VILLAFUERTE, NESTOR	9/5/2024	Please Remove the bullet points on PTA-2A in order to stay within 508 compliance. Please include DUNS in the "other" field.	

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 5:07 PM	History Log:	View History Log
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