Third Party Websites and Applications Privacy Impact Assessment

Date Signed:
March 30, 2018

OPDIV:
SAMHSA

Name:
STATE TA Tracker

TPWA Unique Identifier:
T-8164441-772837

Is this a new TPWA?
Yes

Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?
No

If SORN is not yet published, identify plans to put one in place.
null

Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?
No

Indicate the OMB approval number expiration date (or describe the plans to obtain OMB clearance).
Expiration Date: 1/1/01 12:00 AM

Describe the plans to obtain OMB clearance.
Explanation: null

Does the third-party Website or application contain Federal Records?
No

Describe the specific purpose for the OPDIV use of the third-party Website or application:
The purpose of The State Technical Assistance (TA) Systems (described below), as defined by Substance Abuse and Mental Health Services Administration (SAMHSA), is to enable recipients of TA, SAMHSA, and its contractors to track, communicate, manage, store, and report on information related to TA requests, activities, and TA consultants. The State TA Systems consist of: The Consultant Exchange Database (CEDB), The Technical Assistance (TA) Tracker, Meeting Registration Website, and The State Technical Assistance (TA) SharePoint Portal.

The CEDB is a .NET application that is a repository of expert consultants and enables users to search for consultants who have the expertise and skills needed to fulfill TA and training needs. The CEDB is implemented by using the Microsoft .NET Framework and runs on Windows Server 2012 R2. The users of the application are consultants, SAMHSA staff members, direct contractor staff, JBS International contractor staff, and TA recipients (i.e., state/grantee staff).
The TA Tracker is an application that resides on a .NET platform and serves as a project management tool for tracking TA requests and activities. The users of the application are SAMHSA direct contractor staff, TA recipients (i.e., state/grantee staff), SAMHSA, and JBS/other contractor staff (System Administrators and Developers).

The Meeting Registration Website is an application that resides on a .NET platform and is used to collect registration information for meeting attendees. The users of the site are meeting participants, SAMHSA staff, and JBS contractor staff.

The State TA SharePoint Portal is a SharePoint application used as a repository for files shared between SAMHSA, State, and JBS contractor staff. The users are SAMHSA, State staff, and JBS contractor staff.

Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?  
Yes

Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:  
The information and services provided are not available through other means.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?  
Yes

How does the public navigate to the third party Website or application from the OPDIV?  
No navigation is enabled from the OPDIV to the State TA Tracker systems, which are private applications not designed for public, anonymous access.

Please describe how the public navigate to the thirdparty website or application:  
Direct access URLs provided to authorized users

If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to anongovernmental Website?  
No

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?  
No

Provide a hyperlink to the OPDIV Privacy Policy:  
https://www.samhsa.gov/privacy

Is an OPDIV Privacy Notice posted on the third-part website or application?  
No

Is PII collected by the OPDIV from the third-party Website or application?  
No

Will the third-party Website or application make PII available to the OPDIV?  
No
Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:

The OPDIV does not collect information directly from the third-party State TA systems. OPDIV staff have accounts and roles on the sites and can access the associated PII by logging in.

The data elements collected through the CEDB are:

CEDB Site User profiles include: First Name, Middle Initial (M.I.), Last Name, Telephone, Fax, Email, Title, Username, Password, Organization and CEDB Permissions Role in the system which include the following: Administrator, State Staff, SAMHSA direct contractor staff, JBS Contractor staff, and Consultant.

CEDB Consultant profiles include: First Name, Middle Initial, Last Name, Title, Degree, Affiliation, Mailing Address, City, State, Zip Code, Business Number, Fax Number, Home/Cell Number, Email Address, Occupation, Professional Credentials, and Consultant Skills. The users of the application are Consultants and SAMHSA direct contractor staff.

The data elements associated with the TA Tracker are:

The TA Tracker profiles include: Salutation, First Name, Middle Initial, Last Name, Email, Phone, Organization, Primary Title, Secondary Title and Contact Address: Address/Address 2/Room/City/State/Zip. Organization: Organization Type, Organization Name, Organization Name 2, Organization Name 3, Address, Address 2, Address Type, City, State, Zip and Organization Phone. Contact Information: First Name, Middle Initial, Last Name/Suffix, Title, Organization Level 1, Organization Level 2, Organization Level 3, Street (Express Mail), Address, Mailing (US Postal Service) Address, City, State, Zip Code, Office Phone, Other Phone, Fax and Email Address.

Consultant Information includes: Salutation/Prefix, First Name, Middle Initial, Last Name, Title, Organization Level 1, Organization Level 2, Organization Level 3, Mailing Address, Street Address, City, State, Zip Code, Office Phone, Other Phone, Fax and Email address.

The data elements associated with the Meeting Registration Website (in .NET) are: Site User: Username, Role, and Email address. Meeting Registration Website (in .NET): Registrant, Affiliation (Grantee Organization), Salutation, First Name, Last Name, Middle Initial, Suffix, Degrees, Professional Credentials, Title, Title 2, Address, Room/Suite/Floor, City, State, Zip, Daytime Phone, Cell Phone, Fax, Email, Emergency Contact Name, Emergency Contact Daytime Phone, and Emergency Contact Evening Phone.

The data elements associated with the State TA SharePoint Portal are: Site user: Username and Email.

Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:

PII from the State TA Tracker systems is not shared outside the applications.

If PII is shared, how are the risks of sharing PII mitigated?

N/A

Will the PII from the third-party website or application be maintained by the OPDIV?
Describe how PII that is used or maintained will be secured:

Access to minimal data required to perform specific project responsibilities is restricted by role-based access control enforced by the applications and the backend server and database systems. Access to administrative data management functions on the web applications are strictly limited based on least privileges principles to authorized system administrators with relevant responsibilities designated by SAMHSA and/or JBS State TA staff.

For the TA Tracker, access to this PII is only provided to verified application and system administrators and developers who have a defined need for this information to manage TA requests and to maintain and develop systems. Access to this data is terminated immediately when staff no longer have a role on the project.

For the CEDB, users have access to consultant profiles if the consultant voluntarily provides this information. User accounts are only granted to verified state/grantee, SAMHSA direct contractor, and SAMHSA staff.

What other privacy risks exist and how will they be mitigated?
No additional risks identified.