

US Department of Health and Human Services

Indian Health Service

Third Party Website Assessment Privacy Impact Assessment

- **Date Signed:**

October 5, 2017

- **OPDIV:**

Indian Health Service

- **TPWA Name:**

National Pharmacy and Therapeutic Committee

- **TPWA PIA Unique Identifier:**

T-8817790-143433

- **The subject of this PIA is which of the following?**

National Pharmacy and Therapeutic Committee

- **Please provide the reason for revision**

New

- **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

- **Indicate the SORN number (or identify plans to put one in place)**

#09-17-0001

- **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 and approval number expiration date (or describe the plans to obtain OMB clearance.)**

Per email from Information Collection Officer

- **Does the third-party Website or application contain Federal Records?**

No

- **Point of Contact?**

POC Title: Vice-Chairman, Indian Health Service National Pharmacy and Therapeutics Committee

POC Name: Ryan Schupbach

POC Organization: Indian Health Service

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POC Phone: 405-951-3928

- **Describe the specific purpose of the OPDIV use of the third-party Website or application:**

We are using SurveyMonkey to answer questions which provide continuing medical education for our members. The members receiving continuing education credit are federal employees who are physicians.

Describe the type of information the system will collect, maintain (store), or share.

The information collected is as follows:

1. How did you attend the meeting, in person or virtually?
2. Rate your level of knowledge of the topics presented.
3. Rate how this meeting met your needs.
4. List one thing you will incorporate into your professional work.
5. By implementing this change, I believe I will improve my knowledge, or performance or competence or patient care.
6. Did you perceive any bias or commercialism toward any particular product or

company?

7. Please provide any feedback on the meeting venue.

- **Have 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:**

Members of the public cannot access the survey. Only for federal employees.

- **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?**

This survey is not open to the public and is only available to our federal committee members.

- **Please describe how the public navigate to the third party website or application:**

This survey is not open to the public and is only available to our federal committee members.

- **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 a non-governmental Website?**

No.

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- **Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?**

Yes

- **Provide a hyperlink to the OPDIV Privacy Policy:**

<https://www.ihs.gov/privacypolicy/>

- **Is an OPDIV Privacy Notice posted on the third-party Website or application?**

Yes

- **Confirm that the Privacy Notice contains all of the following elements: (i) An explanation that the Website or application is not government-owned or government-operated; (ii) An indication of whether and how the OPDIV will maintain, use, or share PII that becomes available; (iii) An explanation that by using the third-party Website or application to communicate with the OPDIV, individuals may be providing nongovernmental third-parties with access to PII; (iv) A link to the official OPDIV Website; and (v) A link to the OPDIV Privacy Policy:**

Yes

- **Is the OPDIV's Privacy Notice prominently displayed at all location on the third-party website or application where the public might make PII available?**

Yes

- **Is PII collect 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:**

There will be absolutely no PII collected.

- **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:**

There will be absolutely no PII collected.

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

There will be absolutely no PII collected.

- **Will the PII from the third-party Website or application be maintained by the OPDIV?**

Yes

- **Describe how PII that is used or maintained will be secured:**

There will be absolutely no PII collected.

- **What other privacy risks exist and how will they be mitigated?**

There will be absolutely no PII collected.

- **Reviewer Questions:** The following section contains Reviewer Questions which are not to be filled out unless the user is an OPDIV Senior Officer for Privacy.

Reviewer Questions

1. **Are the responses accurate and complete?** Yes

Reviewer Notes

This is a PTA as no PII will be collected and the public will be unable to navigate to the questions
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2. Is the TPWA compliant with all M-10-23 requirements, including appropriate branding and alerts?

Yes

3. Has the OPDIV posted and updated privacy notice on the TPWA and does it contain the five required elements?

Yes

4. Does the PIA clearly identify PII made available and/or collected by the TPWA?

Yes

5. Is handling of the PII appropriate?

Yes