## US Department of Health and Human Services Indian Health Service

Third Party Website Assessment Privacy Impact Assessment

#### • Date Signed:

October 23, 2017

### • OPDIV:

Indian Health Service

#### • TPWA Name:

STD Prevention - CAC

### • TPWA PIA Unique Identifier:

T-8442713-096853

## • The subject of this PIA is which of the following?

STD Prevention - CAC

#### • Please provide the reason for revision

This is the original TPWA; no revision

• 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)

Not applicable.

• 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.)

Information collection officer indicated no OMB approval is needed for this survey because the survey is for federal employees only.

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

Yes

#### • Point of Contact (POC)?

POC Title: Senior Applied Epidemiologist POC Name: Andria Apostolou POC Organization: Indian Health Service

POC Email: <a href="mailto:andria.apostolou@ihs.gov">andria.apostolou@ihs.gov</a>

POC Phone: 301-443-3690

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

Our project goal is to survey Indian Health Service federal employees working at hospitals/clinics to learn about policies/protocols and electronic health record reminders at their facilities. Federal employees will be surveyed as part of their job and in line for their official duties. We will use Survey Monkey to make the survey electronic to be able to share nationally and to collect the information in a standard manner.

• 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:

Not surveying members of the public.

• 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?

Not surveying members of the public.

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

Not surveying members of the public.

• 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

• Has the OPDIV Privacy Policy been updated to describe the use of a thirdparty 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 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:

We are not collecting personal identifiable information for this survey.

• 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:

We are not collecting personal identifiable information for this survey.

#### If PII is shared, how are the risks of sharing PII mitigated? ٠

We are not collecting personal identifiable information for this survey.

#### Will the PII from the third-party Website or application be maintained by ٠ the OPDIV?

No

#### Describe how PII that is used or maintained will be secured: •

We are not collecting personal identifiable information for this survey.

#### • What other privacy risks exist and how will they be mitigated?

We are not collecting personal identifiable information for this survey.

• **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

- 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