US Department of Health and Human Services

Indian Health Service

Third Party Website Assessment Privacy Impact Assessment

• Date Signed:

July 13, 2017

• OPDIV:

Indian Health Service

• TPWA Name:

IHS QIN-QIO SOW Feedback

• TPWA PIA Unique Identifier:

T-4016912-438295

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

IHS QIN-QIO SOW Feedback

• Please provide the reason for revision

Not a revision, this is a new TPWA.

• 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 required. • 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.)

Discussed with Information Collection Officer and OMB Approval is not required.

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

No

• Point of Contact?

POC Title: Physician POC Name: Jeff Salvon-Harman MD POC Organization: Indian Health Service POC Email: jeffrey.salvon-harman@ihs.gov POC Phone: 301-443-1043

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

Survey of agency regional leaders for input on the Centers for Medicare and Medicaid Services Quality Improvement Network-Quality Improvement Organization 12th Statement of Work (providing Agency input). The Indian Health Service will be using Survey Monkey to complete this survey of its employees to determine the contract deliverables for the next contract in 2018. This survey is to provide input to the Centers for Medicare and Medicaid services. The use of this survey monkey third party application is to gather the responses from IHS employees ONLY for delivery to Centers for Medicare and Medicaid Services.

Survey Monkey was selected as a readily available, accessible and familiar tool among IHS staff, and for its built in data aggregation/analytics to facilitate reporting responses. The survey will collect recommendations from Indian Health Service leaders and staff about what has worked well during the 11th Statement of Work and should be continued, what should be expanded in scale, what could be improved or done differently, and how the work of the 12th Statement of Work should be planned.

• 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:

Information collection is not about or from the public. Survey recipients are federal employees providing input on development of a federal contract Statement of Work. <u>www.surveymonkey.com</u> is the URL for Survey Monkey. The survey is only available as a draft awaiting PTA approval.

• 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?

Information collection is not about or from the public.

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

Information collection is not about or from 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?

• 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?

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:

None, the survey will collect opinions for input on CMS's development of the 12th Scope of Work for QIN-QIOs. Respondents will not be identifiable.

• 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:

No personally identifiable information will be collected or shared from staff or patients.

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

No personally identifiable information will be collected or shared from staff or patients.

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

No

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

No personally identifiable information will be collected or shared from staff or patients.

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

No personally identifiable information will be collected or shared from staff or patients.

• **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
- 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

Reviewer Notes	There is no collection of PHI, making this a PTA
General Comments	There is no collection of PHI, making this a PTA