

**US Department of Health and Human Services  
Indian Health Service  
Third Party Website Assessment Privacy Impact Assessment**

**Date Signed:**

April 13, 2017

**OPDIV:**

Indian Health Service

**TPWA Name:**

Patient Perception Survey Monkey

**TPWA PIA Unique Identifier:**

T-8181731-700255

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

Patient Perception Survey

**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)**

No SORN planned or needed

**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.)**

OMB Approval Number: 0917-0036, Expiration Date: 7/31/2018 12:00:00AM, OMB approval provided January 6, 2017

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

No

**Point of Contact?**

POC Title: Nurse Consultant

POC Name: Kathleen Kimmel

POC Organization: Indian Health Service

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POC Phone: 303-842-3396

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

The Patient Experience of Care Survey is used to collect data for process improvement. Patients, at the end of their visit, will be handed a tablet computer pre-loaded with a link to Survey Monkey. The questions are related to their perceptions of the quality of their visit. The survey is anonymous. No PHI or PII is collected. The information is used to improve the ambulatory clinic experience. The Survey Monkey Patient Experience of Care survey is being piloted at four IHS direct service outpatient ambulatory clinics; 1) Warm Springs in Oregon; 2) Phoenix Indian Medical Center, Arizona; 3) Rosebud Service Unit, South Dakota; 4) Micmac, Maine.

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

The information collected is as follows:

1. An appointment was available when I needed it.
2. When I arrived for my visit, I did not have to wait too long to be seen by my provider
3. The clinic staff were courteous.
4. I have trust in the clinic staff.
5. The clinic was clean
6. The provider listened carefully
7. I received the right amount of attention and time from my provider
8. I was provided with enough information to make decisions
9. I was given the chance to provide input into decisions about my care
10. My culture and traditions were respected
11. I would recommend my provider to family and friends
12. Overall, I am satisfied with my visit
13. My gender (optional)
14. I am a tribal member (optional)

**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:**

The public will be unable to obtain comparable information or services if they elect not to participate in the survey. The Patient Experience of Care Survey using Survey Monkey will be collected on site within the Indian Health Service pilot facilities. There will be no other point of data collection.

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

Yes

**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?**

Yes

**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?**

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:**

No Personally Identifiable information will be collected in the Patient Experience of Care survey. All data collected will be protected and individual responses will not be released to the public. The public does not have access to the secure Survey Monkey account operated by the Indian Health Service survey team. The information collected is as follows:

1. An appointment was available when I needed it.
2. When I arrived for my visit, I did not have to wait too long to be seen by my provider
3. The clinic staff were courteous.
4. I have trust in the clinic staff.
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13. My gender (optional)
14. I am a tribal member (optional)

No PII is collected from administrators who manage the survey.

No information will be released to the public. The information is collected for quality assurance activities of the facility.

As there is no PII being collected, the aggregate responses will be used internally only on the IHS Network.

**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.

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

No personally identifiable information will be collected or shared.

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

Yes

**If PII will be maintained, indicate how long the PII will be maintained:**

No personally identifiable information will be collected or shared.

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

No personally identifiable information will be collected or shared.

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

The survey team and survey administrators who have access to Survey Monkey and its analytic applications will not compare the results to the patient visit logs to identify possible patients who took the survey in an attempt to identify them. The survey results are solely for the purposes of improving the care provided at the participating health care facilities within the Indian Health Service. The results are protected by only using the information on Survey Monkey ONLY. There is no need for further protections, as again, there is no PII collected. The survey will end 8 weeks from the start date which won't begin until we have PTA approval. The results will be used internally (IHS ONLY) for quality assurance purposes. Will be stored and used only on the Survey Monkey application by administrators and destroyed when no longer needed and will only be shared within IHS for quality improvement purposes.

**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