

US Department of Health and Human Services

Indian Health Service

Third Party Website Assessment Privacy Impact Assessment

- **Date Signed:**

February 16, 2018

- **OPDIV:**

Indian Health Service

- **TPWA Name:**

IHS Health Center Survey on Patient Safety

- **TPWA PIA Unique Identifier:**

T-1223645-126196

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

IHS Health Center Survey on Patient Safety

- **Please provide the reason for revision**

Standardization of a patient safety survey across all IHS ambulatory health centers for consistent reporting and early identification of safety risk. Results will be analyzed to develop quality improvement tests of change to improve safety culture and patient safety.

- **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

- **Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?**

Yes

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

Pending response from AHRQ (developer of the Survey of Patient Safety <sup>TM</sup>)

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

Yes

- **Point of Contact?**

POC Title: Quality Medical Officer

POC Name: CAPT Jeff Salvon-Harman, MD

POC Organization: Indian Health Service

POC Email: [jeffrey.salvon-harman@ihs.gov](mailto: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:**

The AHRQ Medical Office Survey of Patient Safety (SOPS) will be administered to all staff at IHS ambulatory health centers and hospital outpatient department staff every 12-24 months via Survey Monkey to assess the culture of safety (those intangible relational elements that impact perceptions, priorities, values, and resources) and drive development of appropriate improvement activities to reduce risk. Survey administration will be coordinated centrally by IHS HQ with support from IHS Area Offices. Data from the survey will be used internally by IHS facilities for quality improvement. No PII will be collected in the survey process. Only aggregated results will be reviewed by facility, Area Office and HQ leaders. No URL is yet available.

- **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 survey may be downloaded/printed from the AHRQ website and administered with pen/pencil. This is more labor intensive, does not support electronic collection and aggregation of the data for analysis, and requires more time than electronic data collection. For IHS use, the survey has been minimally modified from original form by removing potential PII questions. <https://www.ahrq.gov/sops/quality-patient-safety/patientsafetyculture/index.html>

- **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?**

An external hyperlink from and HHS Website or Website operated on behalf of HHS.

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

A dedicated link to surveymonkey.com for the IHS Medical Office SoPS will be distributed by IHS Quality and Safety managers. The link will only be active for a specified period of time and will only be distributed to IHS employees at IHS direct service ambulatory health centers and hospital outpatient departments.

- **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 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?**

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:**

While the Medical Office SoPS includes fields for collecting PII of survey respondents, IHS will omit those fields from use so that no PII will be 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:**

No PII will be collected.

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

No PII will be collected.

- **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 PII will be collected.

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

No privacy risks identified.

- **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