

US Department of Health and Human Services

Indian Health Service

Third Party Website Assessment Privacy Impact Assessment

- **Date Signed:**

October 6, 2017

- **OPDIV:**

Indian Health Service

- **TPWA Name:**

Immunization Pharmacy Survey

- **TPWA PIA Unique Identifier:**

T-9887808-246800

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

Immunization Pharmacy 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)**

#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.)**

No OMB Approval is necessary, this survey is specifically for federal employees in line with their official duties.

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

No

- **Point of Contact?**

POC Title: Immunization Program Manager

POC Name: Amy Groom

POC Organization: Indian Health Service

POC Email: amy.groom@ihs.gov

POC Phone: 5050-232-9966

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

Survey of pharmacists employed at IHS facilities to assess current immunization practices and identify areas for improvement. We are using Survey Monkey to develop and administer the survey. Previous surveys have been administered using this application which is specifically designed to allow for easy design of complex surveys. It also collects data into formats that are easily exported into the statistical software program used for analysis. We are using Survey Monkey to develop and administer the survey. Previous surveys have been administered using this application which is specifically designed to allow for easy design of complex surveys. It also collects data into formats that are easily exported into the statistical software program used for analysis. Surveys are distributed via ihs.gov emails. Information collected pertains to the current role pharmacies and pharmacists have in administering immunizations to patients in their facility, and information on training and support needed to expand their role to provide immunizations to patients.

- **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:**

Survey not accessible to the general public. Survey will collect data only from 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?**

Survey is not accessible to the general public. Survey will be distributed to federal employees.

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

Survey is not accessible to the general public. Survey will be distributed to federal employees.

- **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?**

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 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

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

No PII will be collected.

- **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 PII will be 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

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| 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