

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

February 28, 2017

OPDIV:

SAMHSA

Name:

PAW

TPWA Unique Identifier:

T-6239410-612790

Is this a new TPWA?

Yes

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)?

No

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

No

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

The purpose of the PAW Mobile application is to promote wellness strategies, and offer tips and resources. The application will assist individuals with behavioral health conditions, allowing users to improve their wellness by setting and tracking wellness goals. Individuals will be able to participate in various activities and receive messages tailored to a specific wellness dimension.

Have the 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:

There are many other sources of the information provided by this application. The PAW application simply combines various wellness dimensions into one convenient source on a participants hand-held device.

Users can access products from the SAMHSA Publication Store that focus on the Eight Dimensions of Wellness and contain comparable information (i.e. Wellness Worksheets and Wellness Initiative Self-Help Guide), as well as reference listings that link to many of the resources provided in the app.

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 OPIDIV?

A publicly-accessible page on the SAMHSA website explains the purpose and benefits of the PAW application, provides instructions for how to download the application onto a hand-held device, and directs the interested participants to the location to download the application. Potential participants will be alerted that the application is not part of the SAMHSA website and will be downloaded to their hand-held device. The application has been developed by SAMHSA and is hosted in the SAMHSA information technology environment.

Please describe how the public navigate to the thirdparty website or application:

Once downloaded to the participants hand-held device, the application is readily available on the device at all times.

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 anongovernmental Website?

Yes

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?

No

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.samhsa.gov/privacy>

Is an OPDIV Privacy Notice posted on the third-part website or application?

Yes

Is PII collected by the OPDIV from the third-party Website or application?

Yes

Will the third-party Website or application make PII available to the OPDIV?

Yes

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:

The only PII collected by the PAW application are the user's login credentials (username and password) and email address. The login credentials are collected only to establish the users account in the application; an account is needed so that the user can "track" their progress through the levels of the application and review any history of how they performed on previous levels of the application. The email address is collected in case the participant has difficulty at a later time with their credentials and can request new credentials via their email address. No name, address, phone numbers, demographics, or any other form of PII is collected by the application. The PII is available only to SAMHSA personnel with database administrator privileges; the PII is used for no other purpose other than participant access to the application.

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 information will be shared by the application.

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

N/A

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

Yes

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

PII is used ONLY for access to the PAW application. Additional controls for the PAW PII will be through encrypted media firewalls, encryption, and intrusion detection protecting access to the secure servers; Role-based authorization and authentication with expiration and renewal limits and timeout controls for inactivity.

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

No other privacy risks exist for the application. The application collects no information other than the user credentials. The application simply provides "hints" and guidance for the users to achieve wellness through various "steps" or levels of the application and awards "points" to the users based on the levels achieved.