US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

March 08, 2022

OPDIV:

IHS

Name:

AmazonConnect

TPWA Unique Identifier:

T-2252259-831450

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?

Yes

Indicate the SORN number.

SORN Number: 09-17-0001

If SORN is not yet published, identify plans to put one in place.

null

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 expiration date (or describe the plans to obtain OMB clearance).

Expiration Date: 1/1/01, 12:00 AM

Describe the plans to obtain OMB clearance.

Explanation: null

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

Yes

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

One of the telehealth platforms of the Indian Health Service (IHS) is AA RingMD. AA RingMD uses the Amazon Connect platform as their their ticketing and call routing system. If a patient require support they will select a weblink to request AA RingMD support. If IHS Tier III staff need support they will call AA RingMD who enters the ticket in the Amazon Connect System for IHS.

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:
> The patient can chose to use AA RingMD support or not.

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?
> Other... The link will be posted on the log in page of the AA RingMD application.

Please describe how the public navigate to the thirdparty website or application:
> Patient receives their telehealth appointment with instructions how to log into RingMD. If there are issues in access the system, the patient will select the link posted on the log in page of the AA RingMD application to obtain support.

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?
> No

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://ihs.gov/privacypolicy

Is an OPDIV Privacy Notice posted on the third-part website or application?
> No

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 PII will be the patient and staffs' name, the patient's phone number to call back, and the issue at hand.

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:
> The PII will be the patients and staff' name, the patient's phone number to call back , and the issue at hand to be available to the AA RingMD Support staff Only.

If PII is shared, how are the risks of sharing PII mitigated?
> Amazon Connect is FedRAMP certified. AA RingMD has a BAA with Amazon Web services. HIPAA

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:
> PII that is used or maintained by AA Ring MD in Amazon Connect, is encrypted in transit and at rest. All AA RingMD staff take required annual security and privacy training.

What other privacy risks exist and how will they be mitigated?
none