US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

May 02, 2022

OPDIV:

NIH

Name:

NIH/OD/Qualtrics

TPWA Unique Identifier:

T-9551110-105615

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

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)?

Yes

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

OMB Approval   Various - see explanation

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: OMB clearance may come under one of the following:
Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NIH) OMB Control No: 0925-0648: (Expires 06/30/2024)

Conference, Meeting, Workshop, and Poster Session Registration Generic Clearance (OD) OMB Control No: 0925-0740: (Expires 07/31/2022)

Generic Clearance for NIH Citizen Science and Crowdsourcing Projects (OD) OMB Control No: 0925-0766: (Expires 04/30/2023)

Public Law 114-255, Section 2035, exempts research conducted by NIH from Paperwork Reduction Act (PRA) requirements.

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:
　　Qualtrics is a cloud based research tool that collects and maintains de-identified survey data. Qualtrics partners with over 20 online sample providers to supply a network of diverse quality respondents worldwide. Qualtrics recruit, screen, and survey participants using their existing research panels.

　　NIH staff use this application to conduct both internal and external surveys. Internal survey can include gathering information from principle investigators, scholars, mentors and other staff that rates their satisfaction level regarding certain NIH programs, training or protocols. External surveys could include information clinical subject's satisfaction or views on NIH sponsored programs, research protocols, health disparities.

　　Metrics could include demographics, quality and frequency of interactions, impact of a program on health or career development, digital health (the field of knowledge and practice associated with the development and use of digital technologies to improve health), the level of satisfaction with various program activities, and the impact the program has on the research programs and/or products.

　　Qualtrics is a certified Federal Risk and Authorization Management Program (FedRAMP) vendor that provides the highest data security standards in the US including data isolation, privacy shield certification, and active session management. Qualtrics Privacy policy can be found here: http://www.qualtrics.com/privacy-statement/

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 multiple online survey tools that provide similar functionality. These include Survey Gizmo and Survey Monkey. However, Qualtrics has the ability to pull survey data and automate it into analyzed, qualitative reports that allow the user to see patterns or discrepancies. This, in turn, creates greater transparency for operators to see where programs can be improved.

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...

Please describe how the public navigate to the thirdparty website or application:
　　The OPDIV or Qaultrics sends potential respondents an email with a link to the survey. If the respondent consents, they take the survey.

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?
    Yes

Provide a hyperlink to the OPDIV Privacy Policy:
    http://www.nih.gov/about/privacy.htm

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?
    No

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 personally identifiable information (PII) can include name, e-mail address, phone number, mailing address, organization, demographics such as race, age (date of birth), gender, sex, education, geographical location (county, state, zip code), socio-economic background, and general health profiles.

    The collection of other PII and data uses would be accounted for within another security authorization boundary and separately assessed for privacy and security compliance.

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 information Qualtrics shares can include Name, e-mail address, phone number, date of birth organization, geographic location, health profiles, socio-economic background and demographics.

    Only authorized NIH personnel will have access to the data.

    The collection of other PII and data uses would be accounted for within another security authorization boundary and is separately assessed for privacy and security compliance and has its own PIA, which is routinely reviewed and updated as needed.

If PII is shared, how are the risks of sharing PII mitigated?
    PII will only be shared with authorized NIH staff for the purpose of contacting survey respondents for

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 will be stored in a secure NIH server on federal property. Determinations are made based on role-based access controls and least privilege. User rights are provisioned based on controls within the system, allowing users only access to the minimum amount of PII necessary to perform their job.

What other privacy risks exist and how will they be mitigated?
    NIH cannot control and protect the content of a survey application distributed by a third-party website outside of the NIH network.   However, Instiue and Centers (ICs) will post a privacy notice in the summary section of each survey that informs users of risks and mitigations.