

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

10/27/2016

OPDIV:

AHRQ

Name:

GovDelivery

PIA Unique Identifier:

P-4715270-607603

The subject of this PIA is which of the following?

Minor Application (stand-alone)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

Yes

Does the system include a Website or online application available to and for the use of the general public?

Yes

Identify the operator.

Contractor

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

Describe the purpose of the system.

AHRQ's GovDelivery system was created to help citizens get faster access to more relevant services and resources by allowing them to subscribe to specific content areas on the AHRQ.gov website. Subscription topics range from general information about AHRQ to specific information regarding child and adolescent health, clinical information, data and surveys, Health IT, quality and patient safety, and potential funding opportunities.

Describe the type of information the system will collect, maintain (store), or share.

When initially signing up for email notifications, general public users are requested to provide a valid email address. Users are allowed to create a password if they choose but this is not required to receive updates. AHRQ employees and direct contractors, serving in system administrator and developer roles, provide an AHRQ email to be provisioned an account to access the system.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

AHRQ's GovDelivery system allows visitors of AHRQ's website to receive notifications by e-mail when new information is available for the topics that they have subscribed to.

If a user signs up for these automatic updates they no longer need to check the website for changes. Users only receive notification of changes to topic areas that they are subscribed to and they may voluntarily unsubscribe at any time. To support this functionality, the system will collect and store a valid e-mail address for each user/subscriber. The system will also collect e-mail addresses and passwords for AHRQ employees and direct contractors serving in administrator and developer roles.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

E-Mail Address

System administrator and developer e-mail address and password for provisioning account access

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Public Citizens

How many individuals' PII is in the system?

100,000-999,999

For what primary purpose is the PII used?

The purpose of collecting emails from the general public is to provide notifications of content updates to the general public. Email and password information is collected from AHRQ employees and contractors for account provisioning.

Describe the secondary uses for which the PII will be used.

N/A

Identify legal authorities governing information use and disclosure specific to the system and program.

Section 913 and 306 of the Public Health Service (PHS) Act (42 U.S.C. § 299b-2 and 242k(b)).

Sections 924(c) and 308(d) of the PHS Act (42 U.S.C. 299c-3(c)).

Are records on the system retrieved by one or more PII data elements?

No

Identify the sources of PII in the system.

Email

Online

Government Sources

Within OpDiv

Non-Governmental Sources

Public

Identify the OMB information collection approval number and expiration date

N/A

Is the PII shared with other organizations?

No

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Subscribers to AHRQ GovDelivery based newsletters are required to submit their email address to receive email notifications. If individuals do not want to provide their email address, they can still access newsletter and content information from AHRQ's website. No other notice is provided to individuals who choose to sign up for email alerts. AHRQ employees and contractors are made aware that their user information must be provided to provision account access.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

PII collected is only used to provide e-mail notification to system users when website content has been updated. An individual does not have to provide their email in order to see newsletter and content information, which is available via the website. AHRQ employees and direct contractors must provide their information for account creation. There is no option for employees or contractors to opt out.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

PII collected is only used to provide e-mail notification to system users when website content has been updated. An individual does not have to provide their email in order to see newsletter and content information, which is available via the website. As such, users are not notified when there are major changes to the system. AHRQ employees and direct contractors act as system administrators, and as part of these roles the individuals are aware of all system changes.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

Subscribers who feel their information was misused can contact GovDelivery directly by clicking the feedback link located at the bottom of each GovDelivery email to address their concern. AHRQ employees and direct contractors may address any concerns regarding the use of their information directly with the system owner.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

Emails are only used for the purpose of providing updates, and no determinations are made about the individual based upon the collection of an individual's email. AHRQ employees and direct contractors can contact the system owner to update information, and these users are required to periodically update their user credentials in order to access the system.

Identify who will have access to the PII in the system and the reason why they require access.

Administrators:

AHRQ employees and direct contractors have access to system PII to perform system maintenance.

Developers:

AHRQ employees and direct contractors have access to system PII to perform system maintenance.

Contractors:

AHRQ employees and direct contractors have access to system PII to perform system maintenance.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

AHRQ employees and direct contractors serve as administrators and developers and can access PII as part of these duties. Access is role based and defined and approved by the system owner, and the system owner assigns privileges based on assigned roles and need to know, and access is revoked upon completion of an assigned role.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

The Account Administrator reviews roles and access permissions and grants AHRQ employees and direct contractors based on a right to know and a right to access PII. Development and administrative roles that do not require direct access to PII within the system are provided limited access based upon their user credentials.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

All AHRQ employees and contractors that support the system must complete and comply with annual AHRQ IT Security and Privacy Awareness Training.

Describe training system users receive (above and beyond general security and privacy awareness training).

N/A

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

No records schedule currently exists for this system. Records will be maintained until a records schedule has been identified.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative controls for the system include access controls based upon need to know and access for their job function as set by the system owner. Technical controls for the system include two factor authentication for AHRQ employees and direct contractors using a PIV card and user pin. Physical controls for the system include identification badges and closed circuit television where the system is housed.

Identify the publicly-available URL:

<https://subscriptions.ahrq.gov/accounts/USAHRQ/subscriber/new>

Note: web address is a hyperlink.

Does the website have a posted privacy notice?

Yes

Is the privacy policy available in a machine-readable format?

Yes

Does the website use web measurement and customization technology?

Yes

Select the type of website measurement and customization technologies is in use and if it is used to collect PII.

Session Cookies that do not collect PII.

Persistent Cookies that do not collect PII.

Does the website have any information or pages directed at children under the age of thirteen?

No

Does the website contain links to non- federal government websites external to HHS?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

No