US Department of Health and Human Services
Privacy Impact Assessment

Date Signed:
08/16/2016

OPDIV:
OS

Name:
Minority Health Website

PIA Unique Identifier:
P-4644245-203854

The subject of this PIA is which of the following?
Minor Application (child)

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.
Agency

Is this a new or existing system?
Existing

Does the system have Security Authorization (SA)?
No

Indicate the following reason(s) for updating this PIA.
PII for members of the public is no longer collected or maintained by the Minority Health Website (MHW).

Describe in further detail any changes to the system that have occurred since the last PIA.
MHW no longer collects members' of the public PII (names, addresses, phone numbers) for mailing lists or conference attendance. MHW uses GovDelivery so that members of the public can add their emails addresses to a mailing list to receive newsletters and event information. However, MHW does store and maintain PII for federal employees.

Describe the purpose of the system.
The mission of the Office of Minority Health (OMH) is to improve and protect the health of racial and ethnic minority populations through the development of health policies and programs that will eliminate health disparities.

The MHW supplies information on topic areas that include minority health funding resources, minority health data/statistics, cultural competency, minority health topics, e-learning conducting minority health program evaluations, and a calendar of events of special interest to minority populations.

MHW uses GovDelivery so individuals can add their emails addresses to a mailing list to receive newsletters and event information. A Third Party Website Application PIA is being submitted for GovDelivery for collection of email addresses.

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

Information collected from HHS federal employees as well as other federal employees that are publicly available which may include name, e-mail address and mailing address and phone number.

The names, emails, mailing addresses and phone numbers are sent to us via email for posting on MHW.

Information does include PII, as indicated.

Information collected does not require an approval of an information collection under the Paperwork Reduction Act (PRA). PII is collected for the following reasons: 1. Not to collect information from individuals, but to permit individuals to request information from the government; 2. To register to receive training, and guidance. The PRA explicitly exempts "tests of the aptitude, abilities, or knowledge of persons" (see 5. C.F.R. 1320.3(h)(7)).

Some links on the web site required edits to ensure the user is aware that he or she is leaving an HHS-operated web site. OMH has reviewed all links on its site and inserted exit messages where necessary.

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

The overall nature of the MHW site is to provide information on Minority Health affairs and programs. The content of minorityhealth.hhs.gov is identical to www.omhrc.gov. Some of the web site topic areas include minority health funding resources, minority health data/statistics, cultural competency, minority health topics, an e-learning application on conducting minority health program evaluations, and a calendar of events of special interest to minority populations.

PII collected from HHS and other federal employees that are publicly available may include name, work e-mail address and work mailing address and phone number.

The HHS and other federal employees names, emails, mailing addresses and phone numbers are sent to us via email for posting on MHW.

Information does include PII, as indicated.

MHW system administrators (4 individuals) are direct contractors who have HHS credentials. Credentials are stored within the 2008 R2 Microsoft OS and consist of user name (first initial last name) and strong password. Access to this system is protected through multi-factor authentication method. These credentials are solely used for local connection to the server.

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

Yes

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

Name

E-Mail Address

Mailing Address

Phone Numbers

Information collected for HHS and other federal employees that are publicly available which may

User credentials (First initial, last name and password)

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

Employees

Business Partner/Contacts (Federal/state/local agencies)

MHW does contain names, addresses and phone numbers from HHS and other federal agencies and partners that are collected from their offices or office websites so the public may contact them for program information.

How many individuals' PII is in the system?

100-499

For what primary purpose is the PII used?

The purpose of Minority Health Website (MHW) collections include the following:

Federal employees' information that is publicly available which may include name, business e-mail address and work mailing address and business phone number.

Contacts for public events – National Minority Events across county have conference/event details. The contact information is used to verify conferences/events before posting them to the website.

Email addresses for a weekly and monthly newsletter (the information is collected through govdelivery.com and a Third Party Application PIA is submitted for the collection of email addresses).

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

Not Applicable

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

OMH was reauthorized by the Patient Protection and Affordable Care Act of 2010 (P.L. 111-148), 40 USC 300u-6, as amended.

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

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

Minority Health Info. Service 09–90–0161

Identify the sources of PII in the system.

Email

Online

Government Sources

Within OpDiv

Other HHS OpDiv

State/Local/Tribal

Other Federal Entities

Identify the OMB information collection approval number and expiration date

Due to the stipulations of the current contract, only contact information may be submitted. No facts or opinions are solicited using standardized format.

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.

Individuals are aware of what information is being collected because they choose to supply it themselves, on a voluntary basis. There is further information in the link to the OMH privacy policy at the bottom of each webpage.

Federal employee information that is publicly available is collected from their offices or office websites.

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.

Federal employees are aware of what information is being collected because they or their office choose to supply it. There is further information in the link to the OMH privacy policy at the bottom of each web page.

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

No major changes to the system that would affect individuals' rights and interests are anticipated, but if there were such changes, individuals would learn of them through changes in the System of Record Notice (SORN), or if necessary, could be informed via the contact information they supply to the system (phone and e-mail).

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.

Federal employees can always use the contact information on the webpage to communicate any concerns.

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

Security Reviews to be conducted annually; b. continuous monitoring of MHW status; and c. security certification and accreditation, including risk assessment and security test and evaluation, to be conducted at least every three years. The accuracy and completeness of PII are entirely the responsibility of the individual supplying the information, although OMH can assist in correcting or updating it at individuals' requests.

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

Administrators:

Operation and maintenance of MHW

Developers:
> Operation and maintenance of MHW

Contractors:
> Direct contractors as system administrators

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.
> The system administrators have access through multi factor authentication via RSA tokens and native Office of the Secretary (OS) authentication process. The administrators and developers are qualified professionals that are selected through a rigorous hiring process.

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.
> Once logged in, system administrators have access to the content on the site which is the only content in the database and only contains HHS and other publicly available federal employee name, emails, addresses and phone numbers published on the website for public use.

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.
> Annual training is required and conducted for authorized users regarding proper handling and safeguarding of personally identifiable information. OMH and Office of Minority Health Resource Center (OMHRC) staff are trained on HHS policies regarding personal use of health information technology.

Describe training system users receive (above and beyond general security and privacy awareness training).
> Each of the applications have a process in place to train new users on the applications and process it uses. There are employee orientation manuals that refer to the processes pertinent to the work new employees will be performing. OMHRC contractors periodically conduct internal training for Section 508, Word, Outlook, and application usage trainings. OMHRC contractors are also required to take the mandatory trainings from Health and Human Services University (HHSU).

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.
> Record Control Schedule (RCS) Job Number for Records of the office of the Assistant Secretary for Health (OASH): N1-514-92-1. This Job Number was withdrawn, but is being resubmitted for approval by the National Archives and Records Administration (NARA). In the interim, the records in the system will not be disposed/destroyed until NARA has issued a final disposition authority.
>
> Please note that the records categories and retention periods currently indicated in the SORN do not align with what is found in the Job Number (N1-514-92-1) that is being resubmitted for NARA approval. Once an appropriate time period has been submitted for NARA approval, the appropriate retention period will also be addressed in the SORN. Once approved by NARA, processes will be in place to enforce the approved retention schedule.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.
> MHW utilizes the technical, operational, and physical security controls as required by National Institute of Standards and Technology (NIST) guidance in order to minimize the overall risk to PII. If a security incident does occur, it will be immediately reported to the Office of the Secretary (OS) Chief Information Security Officer (CISO) and through him, to the HHS PII Breach Response Team.

They will analyze the incident, determine its impact, limit its damage, and restore normal processing.

Additional controls include:

Administrative Controls:
   System security plan
   Contingency Plan
   File backup
   Security Awareness and Training
   Contractor Agreements
   Least Privilege Access
   Retention and Destruction Policies

Technical Controls
   User Identification
   Passwords
   Firewall
   Encryption
   Intrusion Detection Systems

Physical Controls
   Guards
   Identification Badges
   Key Cards
   Closed Circuit TV

Identify the publicly-available URL:
http://minorityhealth.hhs.gov

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.
Other technologies that do not collect PII:

The system uses "cookie-less cookies," a technology that improves the browsing experience without making any permanent installation on the users' computer. The relevant information is contained within the URL.

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?
Yes

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