

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

April 12, 2021

OPDIV:

IHS

Name:

COVID-19 Course Evaluations

TPWA Unique Identifier:

T-9782271-526668

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 null

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: Is exempt from OMB/PRA review

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:

Indian Health Service (IHS) Office of Information Technology (OIT) Coronavirus (COVID-19) Workgroup will use Survey Monkey as a means of distributing course evaluation and Continuing Education certificates to Federal, Tribal and Urban staff to gain information to improve the OIT Clinical and Health Informatics COVID-19 training program and the IHS Vaccine Task force. By using Survey Monkey, OIT can provide participants with a link to a survey, participants complete the course evaluation and survey. OIT may then analyze participant feedback and address Federal, Tribal and Urban Clinical and Health Informatics training needs.

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:

Participants can complete a paper form and email it to the Continuing Education Planner.

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?

At the end of the on-line training session, the link is provided and the participant can choose to click on the link.

Please describe how the public navigate to the third-party website or application:

The participant seeking continuing education credit will click on the link, which will take them to Survey Monkey.

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 a nongovernmental 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://www.ihs.gov/privacypolicy/>

Is an OPDIV Privacy Notice posted on the third-party 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:

Participant's name, address, credentials, email address, and the computer device identifier.

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:

Participant's name, address, credentials, email address, is collected and downloaded into an Excel workbook then securely transferred to Indian Health Service Clinical Support Center. The information is entered into a Continuing Education database to meet Joint Accreditation reporting criteria. In addition, the data is stored for historical purposes, should participants request a transcript of their training. The data is maintained for six years.

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

Personally Identifiable Information is transferred to the Indian Health Service Clinical Support Center

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:

The Indian Health Service Clinical Support Center Access database resides on an Indian Health Service Phoenix Area secured server. The Survey Monkey resides on a cloud protected by Survey Monkey and is accessed with a protected password.

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

Paper or microfiche/microfilmed records are located in locked metal file cabinets or in secured rooms with access limited to those personnel whose official duties require access. Access to computerized records is limited, through use of user logins and passwords, access codes, and entry logs, to those whose official duties require access. Computerized records systems are consistent with the requirements of the Federal Information Security Management Act (Pub. L. 107-296), and associated OMB policies, standards and guidance from the National Institute of Standards and Technology.