

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

April 25, 2017

**OPDIV:**

SAMHSA

**Name:**

Adoption of Behavioral Health Information Technologies Among Behavioral Health Providers Survey

**TPWA Unique Identifier:**

T-6965912-407900

**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.**

Not Applicable.

**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:

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

Expiration Date:

**Describe the plans to obtain OMB clearance.**

Explanation: Submitting documents for OMB clearance on 4/18/17

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

No

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

123ContactForm is a web-based online tool that will be used to build a survey and collect information from (all or randomly selected) SAMHSA grantees. The purpose of the survey is to collect information to see how SAMHSA grantees are using various types of health Information Technology (HIT) in terms of interoperability and health information exchange. The center/office directors from the Center for Substance Abuse Treatment (CSAT), the Office of Financial Resources (OFR), and the Center for Behavioral Health Statistics and Quality (CBHSQ) recommended having SAMHSA grantees respond to the survey to help guarantee a high response rate.

Examples of the information the survey collects:

Respondents' first and last name

Work email

Work title

Name of the organization

SAMHSA grant identification number

Factors influencing the adoption of health IT;

Adoption rates of various types of health IT (EHRs, telehealth, and mHealth);

Methods used to electronically exchange (send or receive) key clinical information with providers outside their organization.

The survey will provide federal government agencies, stakeholders and the public with critical information to be used to develop best practices on how to best work together to advance health IT adoption, use and interoperability in behavioral health settings. Additionally, to develop strategies to improve the way in which behavioral healthcare providers can leverage health IT to provide care that is cost effective, high quality, and patient-centered.

**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:**

An intended recipient will be able to notify the OpDiv about wanting to use a non-123ContactForm survey by contacting a help desk via a 1-800 number or specially created email account. The option of filling out a PDF or paper version of the survey will be made available upon request.

**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?**

An external hyperlink from an HHS Website or Website operated on behalf of HHS

**Please describe how the public navigate to the thirdparty website or application:**

The public will answer a series of questions using an online survey on health information technology.

**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:**

<https://www.samhsa.gov/privacy>

**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 survey will collect the following PII: respondents' first and last name, work email, work title, and name of the organization they work for. Additionally, the survey will ask respondents to provide the SAMHSA grant identification number of the grant program they are involved in.

The information will be used primarily to ensure that the most appropriate individual responded to the survey, to identify duplicate respondents, to follow up with thank you messages, and to ask for clarifications (if needed). PII will not be collected to grant users access to the 123ContactForm. PII will be removed from the system soon after it is received by SAMHSA and no later than September 15, 2017.

**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:**

PII collected using 123ContactForm (i.e. respondents' first and last name, work email, work title, and name of the organization they work for) will be shared with the National Council, SAMHSA, and The Office of the National Coordinator for Health Information Technology (ONC). The National Council will be responsible for downloading a report (in Excel) from 123ContactForm and uploading it onto SharePoint to securely share with SAMHSA and ONC.

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

Risks of sharing PII are mitigated by using SharePoint, a Microsoft product that is FedRAMP

**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:**

123Contactform is hosted on Amazon Web Services, one of the most prominent servers on the Web equipped with the best network protection tools. The platform is carefully monitored 24/7 for potential threats and unauthorized activities, such as Man in the Middle Attacks or IP

Spoofing. 123ContactForm has the latest packages installed, updated whenever needed with a 256-bit SSL (Secure Sockets Layer) path between users and their 123ContactForm accounts and sub-accounts. All data is encrypted and securely kept on Amazon's servers in multiple data centers across the United States.

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

No other security risks anticipated