

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

March 02, 2018

**OPDIV:**

NIH

**Name:**

NIH OD Disqus

**TPWA Unique Identifier:**

T-3212202-976442

**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.

NA

**Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?**

No

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: NA

**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:**

National Institutes of Health (NIH) Institutes and Centers (ICs) will use Disqus as a platform to allow user comments within selected pages/sections of their public facing websites. This is an umbrella Third Party Website Applications (TPWA) Privacy Impact Assessment (PIA) that will be used National Institutes of Health (NIH) wide by all Institutes and Centers (ICs)

**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:**

No unique government content will be distributed via Disqus. IC's Communications and Public Liaison office staff may occasionally respond to questions or comments on Disqus; non-Disqus users may contact an IC's Communications, Public Liaison, or public information service centers through an IC's telephone, email, or postal mail services.

**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?**

Incorporated or embedded on HHS Website

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

As an umbrella Third Party Website Applications (TPWA) Privacy Impact Assessment (PIA), the link will vary as each Institute and Center (IC) maintain their own public websites. From each participating NIH IC's website, the user clicks on the hyperlink and is directed to the third-party application.

**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.nih.gov/web-policies-notice>

**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:**

Users could potentially provide PII or PHI to Disqus that may then be visible to IC staff. Examples include an identifiable username or personal information included in comments the user makes via Disqus. PII or PHI in comments themselves would be flagged for redaction by IC staff moderators and not displayed on the public IC website. Such users will be referred to IC information services, IC communications, or IC Public Liaisons where possible. Comments that voluntarily disclose health information for the purpose of public discussion may be permitted (e.g. "I have [some type of health issue] and I'm concerned about research funding for it").

**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:**

None

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

NA

**Will the PII from the third-party website or application be maintained by the OPDIV?**

No

**Describe how PII that is used or maintained will be secured:**

No PII used or maintained.

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

Even in a moderated social medium, protection of PII is dependent upon the actions of the site visitor who chooses to use the Disqus commenting feature. Users choose whether to expose personal information both on their profiles and in the comments they post. NIH will attempt to educate users who visit the NIH Privacy Policy page about these, and other, risks.