US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

May 22, 2020

OPDIV:

OS

Name:

OS Data Guardian Program Support Survey Monkey

TPWA Unique Identifier:

T-9640170-813305

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.

N/A

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: N/A

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:

Office of the Secretary (OS) Health and Human Services (HHS) employees will use Survey Monkey as a survey via an email invitation (using HHS' email network) to poll general information from program participants on OS Data Guardian Program's effectiveness.
Sample survey questions include:
1. Do you require any additional training or support in your OS Data Guardian Program role?
2. Are you satisfied with the current (quarterly) frequency of the Data Guardian meetings?
3. Please describe any topics or training you would like addressed during future Data Guardian meetings.

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:
Survey Monkey will be accessible only by HHS OS Employees in answering questions. If respondents choose not to use Survey Monkey, they have the ability to submit emails regarding the survey questions.

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?
N/A

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

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?
Yes

Provide a hyperlink to the OPDIV Privacy Policy:
https://www.hhs.gov/privacy.html

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?
No

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:
Depending on the survey, the following OS Data Guardian Program and Management Training staff's personal identifiable information (PII) may be compiled: Officer's (Survey Monkey account holder) name, rank, phone number, and email address.

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 is only used within the Office for OS Data Guardian Program and Management Training. There is no plan to share PII.

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

PII will not be shared outside the Office for OS Data Guardian Program and Training Management.

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:
PII is only maintained by team members of OS Data Guardian Program and Training Management Office. It is stored on the user's (account creator's) Government Furnished Equipment (GFE).

What other privacy risks exist and how will they be mitigated?
No PII information is captured or shared from the survey respondents, other than the Survey Monkey account creator's information as previously stated. This Branch intends to check all privacy settings in Survey Monkey, so the respondents' PII is not captured.
All surveys are anonymous, meaning the identity of the person responding is not captured or discoverable by the Survey Monkey account holder. I am not aware of any other privacy risks.