

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

December 04, 2020

OPDIV:

IHS

Name:

CDC Vaccine Administration Management System

TPWA Unique Identifier:

T-6690981-558182

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)?

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: OMB Approval not required.

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:

Vaccine Administration Management System, The Vaccine Tracking System and Vaccine Adverse Event Reporting System are applications for managing data related to managing COVID data vaccines.

Established in 1990, the Vaccine Adverse Event Reporting System (VAERS) is a national early warning system to detect possible safety problems in United States vaccines. VAERS is co-managed by the Centers for Disease Control and Prevention (CDC) and the U.S. Food and Drug Administration (FDA). VAERS accepts and analyzes reports of adverse events (possible side effects) after a person has received a vaccination.

The Vaccine Tracking System (VTrckS), is a secure, web-based information technology system integrates the entire publicly-funded vaccine supply chain frmo purchasing and ordering through distribution to participating state, local, and territorial health departments (referred to as 'awardees') and health care providers.

Vaccine Administration Management System (VAMS) is an easy-to-use, secure, online tool to manage vaccine administration from the time the vaccine arrives at a clinic to when it is administered to a recipient. VAMS is free for public-health-approved clinics, and can be used on computers, tablets, and other mobile devices. It is not a smartphone app, and no installation or download is required for this web-based platform.

The Indian Health Service is acting as a Provider in its use of VAMS for tracking distribution of COVID-19 vaccination to its employees and not as an Operating Division.

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:

There is no alternate means for VAMS. IHS is in an agreement with CDC that we will use VAMS.

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?

The patient will receive an email with a link for accessing the website

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

The patient will receive an email that contains a link to the website.

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?

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:

www.ihs.gov/privacypolicy

Is an OPDIV Privacy Notice posted on the third-part website or application?

Yes

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:

Name, date of birth, race, gender, ethnicity, address, informed consent, county of residence, tribal affiliation, vaccine screening information, date and location of vaccine administration, signature and title of vaccinator, facility where administered, lot and manufacturer of vaccine, site of administration, if vaccine was successful or unsuccessful and any vaccine wastage, will all be captured.

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:

All PII collected will be shared back to IHS, for the public health emergency.

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

All information will only be shared via encrypted files.

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:

This information is secured in the CDC AMS System using their Administrative, Technical and Physical Safeguards - Administrative - Users will be granted access using a least privilege model by the Business Owner/Data Manager.

Technical - The back-end storage will be protected through the explicit access for those so authorized. Users who access the system on the CDC network shall be authenticated via PIV and username and passphrase.

Physical - The server is located in an access-controlled area with locked doors and security guards.

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

None