

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

April 01, 2019

OPDIV:

IHS

Name:

Pharmacy Batch Mail System

TPWA Unique Identifier:

T-2875080-551620

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.

No SORN is needed.

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: No OMB approval needed. This is not a new system of records.

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:

The third-party Website will be used to streamline the prescription delivery service. The third-party Website will generate package shipping labels with tracking numbers for prescription deliveries via an interface to the pharmacy batch mail system.

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:

The public will not have access to the third-party Website. IHS employees with access to the third-party Website will continue to provide prescription delivery service to the public with improved IHS employees with access to the third-party Website will continue to provide prescription delivery service to the public with improved tracking and accountability of the deliveries.

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 general public cannot navigate to the third-party Website from IHS.

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

The general public cannot navigate to the third-party Website from IHS.

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?

Yes

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.ihs.gov/privacypolicy/>

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 third-party Website will collect the IHS personnel user name and password, the first and last name, street address, and zip code of public citizens who are receiving prescription deliveries by mail, business partners and other Federal agencies that participate in the IHS Mail Prescription Delivery Service including the USPS (United States Postal Service), UPS (United Parcel Service) and FedEx, and the tracking number, service type (e.g. First Class Mail, Priority Mail, etc.), additional services (e.g. Certified Mail, Registered Mail, etc.), and value of the postage for each package. There is no prescription-related PII collected in the third-party Website (e.g. pharmacy batch number, prescription name or quantity, etc.). The intended use of the PII is to generate bar-coded tracking labels in compliance with USPS regulations for sending packages via the USPS in accordance with General Services Administration (GSA) Schedule 48 Transportation, Delivery & Relocation Solutions and with FedEx and UPS regulations for sending packages in accordance with the Department of Defense (DoD) Next Generation Delivery Service Best-in-Class mandatory government-wide solution for small package delivery services. The public cannot access PII in the third-party Website or make PII available to IHS through the use of the third-party Website.

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:

The PII is not shared from the third-party Website. The package recipient's name and address are redacted in production log files. The PII are stored in production database for customer online history and USPS reporting purposes. Only permitted database administrators have access to the PII.

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

The system utilizes least privilege and role-based access controls. Access is granted to a limited.

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:

All files are encrypted via HTTPS TLS 1.2 protocol and encryption is Federal Information Processing Standards (FIPS) Publication 140-2 compliant. All data are purged from the third-party Website every 5 years. There are administrative safeguards including user training and access only for 'Need to Know' database administrators . There are technical safeguards including unique sign on and passwords for users, role-based access settings, and firewalls.

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

If the third-party Website fails to meet the needs and expectations to safeguard PII or data are breached, IHS prescription mail operations would be impacted and possibly result in outsourcing to another delivery method or eliminating the pharmacy batch mail system interface to a mail system. This is partially mitigated by the fact that other Departments have been using third-party Websites to streamline prescription deliveries without incident on multiple contracts, the PII is limited to name and address and no medical or prescription information is collected or maintained and the third-party Website monitors activity to safeguard PII.