

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/25/2017

**OPDIV:**

OS

**Name:**

HIV.Gov

**PIA Unique Identifier:**

P-6455269-831024

**The subject of this PIA is which of the following?**

Minor Application (stand-alone)

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Development

**Is this a FISMA-Reportable system?**

Yes

**Does the system include a Website or online application available to and for the use of the general public?**

Yes

**Identify the operator.**

Agency

**Is this a new or existing system?**

New

**Does the system have Security Authorization (SA)?**

No

**Describe the purpose of the system.**

HIV.gov disseminates information about federal policies, programs and resources related to HIV/AIDS and supports the use of new media to promote key messages to its audiences. HIV.gov provides the location of Federal HIV services provided by The Centers for Disease Control and Prevention (CDC), Housing and Urban Development (HUD), Health Resources and Services Administration (HRSA), and Substance Abuse and Mental Health Services Administration (SAMHSA) via the website.

**Describe the type of information the system will collect, maintain (store), or share.**

System does not store any information entered by public site visitors.

HIV.gov has login credentials (administrative logins (username, password) for editorial staff (direct contractors) that maintain and update website content. These logins are strictly controlled by site administrators and adhere to HHS policies regarding login access and security.)

Username and passwords are distributed by site administrators to editors or website authors. They are issued usernames and passwords as members of the HIV.gov team (contractor or Federal employee). Usernames and passwords are deleted in the event that the user leaves the HIV.gov team. Business contact information in the form of mailing address for the Office of HIV/AIDS and Infectious Disease Policy is included on the "About Us" page of the website.

The Drupal (CMS) that runs the www.hiv.gov website resides within Amazon Web Services system boundaries. Usernames and passwords are managed by direct contractors.

Locator.hiv.gov requests a zip code, current location (latitude + longitude), or city and state as an input to provide search location results. HIV.gov provides information on testing and HIV service locations for individuals interested in receiving testing, counseling and care.

HIV.gov displays photographic identifiers, business titles, and business organization for blog authors and subject matter experts (members of the public). HIV.gov blog authors are Federal employees, or guest blog authors (subject matter experts), which are members of the public.

In the byline of the blog, HIV.gov displays a copy of the author's photo and their business title. In the body of a blog post, HIV.gov may use quotes from subject matter experts. When using these quotes, HIV.gov displays their names, and business titles to establish credibility for the information in the quote.

HIV.gov shares voice audio of the men in the Positive Spin videos (on <https://positivespin.hiv.gov>). The individuals in the videos share their personal experiences navigating the HIV Care Continuum.

**Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.**

HIV.gov has login credentials (administrative logins (username, password) for editorial staff (direct contractors) that maintain and update website content. These logins are strictly controlled by site administrators and adhere to HHS policies regarding login access and security.)

HIV.gov displays photographic identifiers, business titles, and business organization for blog authors and subject matter experts (members of the public). HIV.gov blog authors are Federal employees, or guest blog authors (subject matter experts), which are members of the public.

In the byline of the blog, HIV.gov displays a copy of the author's photo and their business title. In the body of a blog post, HIV.gov may use quotes from subject matter experts. When using these quotes, HIV.gov displays their names, and business titles to establish credibility for the information in the quote.

Through geolocation or use of zipcode, the HIV.gov Locator lists providers for HIV testing and care, mental health and substance abuse, housing assistance, and Ryan White (Federal HIV program providing assistance to those living with HIV) services. The site does not store or save this search information.

HIV.gov shares voice audio of the men in the Positive Spin videos (on <https://positivespin.hiv.gov>). The individuals in the videos share their personal experiences navigating the HIV Care Continuum.

**Does the system collect, maintain, use or share PII?**

Yes

**Indicate the type of PII that the system will collect or maintain.**

Name

Photographic Identifiers

Biometric Identifiers

E-Mail Address

Mailing Address

Phone Numbers

Zip Code

Business Title/organization

Geo location

Voice audio

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

Employees

Public Citizens

Business Partner/Contacts (Federal/state/local agencies)

**How many individuals' PII is in the system?**

100-499

**For what primary purpose is the PII used?**

Site admins: login

Business Partners/Contacts: provide basis/context and organizational credibility for information provided on publicly available websites (author bylines, quotations, references to job title or position of authority within an organization) Business contact information for Federal offices is also listed (including emails, phone numbers, and mailing addresses) Also, we display photos (biometric identifiers) and voice audio for the men on <https://positivespin.hiv.gov>.

**Describe the secondary uses for which the PII will be used.**

N/A

**Identify legal authorities governing information use and disclosure specific to the system and program.**

5 USC 301, Departmental Regulation

**Are records on the system retrieved by one or more PII data elements?**

No

**Identify the sources of PII in the system.**

Online

**Government Sources**

Within OpDiv

Other HHS OpDiv

Foreign

Other

**Non-Governmental Sources**

Public

Media/Internet

**Identify the OMB information collection approval number and expiration date**

N/A

**Is the PII shared with other organizations?**

No

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

By agreeing to be the source of the quote, notification is given to the individual that their name, title, organization or locality will be shared online.

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.**

An individual could choose not to serve as the source of the quote.

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

We will not be using the PII for any purpose other than the purposes specified prior to or during collection, so the data uses will not change. If we need to notify and obtain consent, we do so by email or telephone communication to the individual.

**Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.**

An individual can contact HIV.gov via telephone or email to discuss and resolve any concerns regarding the use of PII. HIV.gov will then provide notification to the individual via telephone or email that the resolution has been implemented. They can request that their PII be removed or updated to reflect accurate information.

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

For site admins, login credentials are removed if they are no longer admins for the site as they terminate their relationship with HIV.gov. Authorship and accuracy of titles can change based on the person's continued association with that organization.

**Identify who will have access to the PII in the system and the reason why they require access.**

**Administrators:**

Administrators are direct contractors that have access to usernames for Direct Contractors and Developers who work on the site. They have authority to create and terminate these credentials. Have access to names, job titles, and other information for the publicly available information contained in the articles.

**Developers:**

Have access to names, job titles, and other information for the publicly available information contained in the articles.

**Contractors:**

Direct contractors have access to names, job titles, and other information for the publicly available information contained in the articles.

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

Roles are managed within Amazon Web Services at the system level and the Drupal CMS at the application level for HIV.gov, the websites locator.hiv.gov and positivespin.hiv.gov have no role-based users. To ensure that only authorized personnel have access to any credential management only administrative roles have privileges to maintain user accounts. Administrators can access that information, grant access, or change information. Site administrators are limited to senior technical staff responsible for maintaining and updating the site.

**Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.**

Site controls on HIV.gov are segmented by roles such as Anonymous, Authenticated, John Snow, Inc. and Administrator. Permissions limit the needs of each role and not visible to others. This provides a clear separation of access based on the role of the user.

**Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.**

Required cybersecurity and privacy annual training

**Describe training system users receive (above and beyond general security and privacy awareness training).**

N/A

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

User names are controlled by a site administrator. User names are issued to site editors and authors by the site administrator. If an author or editor leaves the project, those credentials are deleted by the site administrator.

Published PII, such as the names, titles, and locality of contributors and authors is maintained on the site according to the HHS rules for retention and archival of records. This published information can be removed from the site at the request of the individual contributor.

Office of HIV/AIDS and Infectious Disease Policy (OHAIDP) is working with HHS to obtain a record retention schedule and will retain records until a schedule is identified.

**Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.**

Administrative controls: Site administrators receive regular training in security rules and procedures for protecting PII. This training must be completed on an annual basis.

Technical controls: Usernames and passwords utilize MD5 hashing for encryption. User accounts are automatically locked after 60 days of inactivity. User accounts are logged off of the site after 15 minutes of inactivity.

Physical controls: Our hosting solution provides physical security including video surveillance, biometric security, and round-the-clock onsite guards.

**Identify the publicly-available URL:**

<https://www.hiv.gov>

<https://positivespin.hiv.gov>

<https://locator.hiv.gov>

Note: web address is a hyperlink.

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

Yes

**Select the type of website measurement and customization technologies is in use and if it is used to collect PII.**

Session Cookies that do not collect PII.

Persistent Cookies that do not collect PII.

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

Yes

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

No