US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

February 16, 2018

OPDIV:

OS

Name:

Therapist Professional Advisory Subcommittee Survey Monkey

TPWA Unique Identifier:

T-3387738-042015

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?

Yes

Indicate the SORN number.

SORN Number: Will request

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: Will request

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:

We are using a paid Survey Monkey account.

The surveys administered will be sent to Therapist officers in the United States Public Health Service to survey opinions regarding the effectiveness of Therapist Professional Advisory Committee (TPAC) programs. The TPAC is a governing body appointed by the U.S. Surgeon General. The elected, then appointed positions are collateral duty positions representing several agencies throughout The Department of Health and Human Services (HHS). Several committees exist in the TPAC and survey collection is vital for daily business operation. There are approximately 160 officers in the TPAC and the survey will be sent out via our National Institutes of Health (NIH) Therapists listserv as a link, so the response will be anonymous.

No personally identifiable information (PII) will be collected since the survey responses will be anonymous. SurveyMonkey.com is a company that offers powerful web-based survey solutions so organizations of all sizes can gain the insights they need to make more informed decisions. It enables users to create their own web-survey, collect responses, and analyze results using free (e.g., basic) and enhanced paid products and services (e.g., select, gold, and platinum). It is used by survey creators (people who create and conduct surveys on-line) and survey respondents (people who answer those surveys). It allows a user to design a survey using several question formats (e.g., multiple choice, true/false, open-ended) and color palettes, e-mail, and track respondents and export data into Survey and Sampling Analysis/Statistical Package for the Social Sciences SAS/SPSS programs for more complex analysis.

It collects information (personal data, registration/billing information, account settings, address book information, survey data, server web logs, and other data intentionally shared) in order to assess customer satisfaction and/or evaluate the effectiveness of a program. The user can make surveys completely public and indexable by search engines, password protect them, distribute them to a restricted list of people, or choose to share survey responses instantly or at a public location. By default, surveys are anonymous if the survey creator chooses to configure their settings as such. However, specific questions in the survey may still ask an individual to provide personal information or data that could be used to identify them. Anything a respondent expressly discloses in their survey response.

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:
An alternative option is for the public to complete the survey by mail. The option of filling out a portable document format (PDF) or paper version of the survey will be made available upon request.

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?
An external hyper-link from an HHS Website or Website operated on behalf of HHS.

Please describe how the public navigate to the thirdparty website or application:
By an external hyperlink from the NIH Listserv which has been set up for the therapist category, Website operated on behalf of TPAC.

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:
The HHS Operating Division (OPDIV) Privacy Policy is located at: https://www.hhs.gov/privacy.html

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?
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:
The survey will not collect PII. It will only collect anonymous responses to the survey questions from the public.

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:
A link to the survey will be sent out via the NIH Therapist Listserv. Survey responders will click on the link. Only the survey responses will be collected, and the results of the survey will be shared to other Therapists officers. No PII will be collected or shared. The purpose for sharing the survey responses is to assist the committees, subcommittees, and the TPAC leadership with program development.

Upon creation of an account, the user must provide a unique user name and password that must be entered each time the user logs on. A session cookie will record encrypted authentication information for the duration of a specific session.

If PII is shared, how are the risks of sharing PII mitigated?
PII will not be shared. Only the responses to the questions will be shared with other TPAC members.

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:
The TPAC cannot control and protect the content of a survey application distributed by a third party website outside of the Health Resources and Services Administration (HRSA) network. However, the TPAC will post a privacy notice at the top of the survey in the summary section.

Survey Monkey clearly posts on their disclaimer notice that they have no responsibility or liability for the compromise or loss of data, which increases the TPAC's risk.

The survey responses are protected and will be collected anonymously. The results will only be shared with other members of the TPAC, but the PII will be protected and not shared.

What other privacy risks exist and how will they be mitigated?
The link will be sent out via the Listserv, therefore, responses will be collected anonymously to maintain anonymity.