US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

November 06, 2020

OPDIV:

NIH

Name:

CC Library Overdrive

TPWA Unique Identifier:

T-6605612-800496

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: null

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:

The NIH Patient Library uses OverDrive to provide an electronic resource to Clinical Center patients for checking in and out eBooks, audiobooks, and streaming videos in the NIH library catalog.

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:

This service is for patients at the NIH Clinical Center.   However, both patients and the general public may find that eBooks, audiobooks, and streaming video subscriptions are available to them through their own local public libraries or schools.   Also, the internet offers multiple alternative online sources.

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 hyperlink from the NIH Library or from any OverDrive supported site (such as school or library).

Please describe how the public navigate to the third party website or application:
Patrons may visit https://www.cc.nih.gov/participate/patientlibrary and click on options to access OverDrive. Once they have the URL, they may book mark it and visit it directly.

Patrons may also download Libby, the OneDrive mobile application (app). Libby may ask for various permissions when installed for access to various areas or system libraries on a user's phone. The exact permissions may vary from version to version. Currently the Libby app requests the county your library card is affiliated with in order to verify your library account. collect device location.

The NIH instance of OverDrive requires a patron number to check out materials. This number does not contain any identifying information about the user and is generated upon patron request. Library visitors, via the website, are instructed to obtain a patron number by calling a telephone number published on the NIH library 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?
Yes

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:
https://www.cc.nih.gov/disclaimers.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:
No PII is collected by this application.

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 non-identifying patron number is generated at random by NIH and is given to patrons. It is also uploaded to the OverDrive site (by NIH) to ensure that the number works for the patron's use. The patron number then may be used by NIH to track materials that are checked out.

If PII is shared, how are the risks of sharing PII mitigated?
  Personally identifiable information (PII) is not used. NIH keeps a master list in a Microsoft Excel

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:
  No PII is collected by this application.

What other privacy risks exist and how will they be mitigated?
  There are no other risks at this time.