

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

July 11, 2017

OPDIV:

SAMHSA

Name:

SAMHSA Blog

TPWA Unique Identifier:

T-1107038-311709

Is this a new TPWA?

No

Please provide the reason for revision.

Annual Review

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.

N/A

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).

N/A

Describe the plans to obtain OMB clearance.

N/A

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:

To communicate and promote SAMHSA information, programs, policies, and strategic initiatives to the public. To provide a forum for two-way engagement between SAMHSA and the public in accordance with the Open Government Directive. To open or administer the SAMHSA blog, a SAMHSA Office of Communications employee enters the third party website SAMHSA username and password. This username and password information is saved on SAMHSA's internal/secure network and the only persons at SAMHSA who access and maintain SAMHSA'S Blog are the staff of SAMHSA's Office of Communications. No SAMHSA employee/Direct Contractor PII is submitted to gain access.

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:

All content published on the SAMHSA blog is uniquely created for the blog. Most blog updates link to other resources for additional information (such as websites, publications, etc.).

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?

Incorporated or embedded on HHS Website

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

Users can link to SAMHSA's blog via an external hyperlink on the SAMHSA.gov website. Users can also search other third-party web-based search tools for SAMHSA's blog.

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:

<https://www.samhsa.gov/privacy>

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:

All comments submitted to SAMHSA's Blog channel go through the comment clearance process to ensure PII isn't shared via the comment option. Since the SAMHSA Blog channel is pre-moderated, PII is not shared on the channel and only collected in the event of a comment policy violation. The only information that will be collected is a person's name and the comment they posted that violated the commenting policy.

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 only information that will be collected is a person's name and the comment they posted that violated the commenting policy (<https://www.samhsa.gov/privacy.aspx>).

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

PII is only shared with SAMHSA staff if an individual has posted content on SAMHSA's blog that is

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:

SAMHSA's Blog is secured by a username and password that is held by two administrators in SAMSHA Office of Communications.

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

N/A