

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

September 29, 2020

OPDIV:

IHS

Name:

Facebook Messenger

TPWA Unique Identifier:

T-8334905-593414

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: OMB/PRA review is not applicable.

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:

Connect in realtime to patients regarding healthcare for in response to the COVID-19 pandemic

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:

Traditional phone calls and other means are available if the patient chooses not to use this service. However, every public method may have value in response to the COVID-19 pandemic.

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 OPDIV?

Other...

Please describe how the public navigate to the third-party website or application:

The public can access the service through a phone app or the applications 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 a nongovernmental Website?

No

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.ihs.gov/PRIVACYPOLICY/>

Is an OPDIV Privacy Notice posted on the third-party 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 OPDIV does not collect PII from the website or 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:

The OPDIV does not collect PII from the website or application.

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

N/A

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:

N/A

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

The messages may be parsed by Facebook to generate targeted advertisement. The patient has accepted the Facebook privacy policy terms of service and providers should consider moving to more secure environment after initial coordination and discussion when available. The patient must be aware of their surroundings and providers have been asked to provide a disclaimer to patients before talking about sensitive information.