

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

06/09/2016

**OPDIV:**

OS

**Name:**

TurnTheTideRx.org

**PIA Unique Identifier:**

P-6584555-925181

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

Electronic Information Collection

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

Test

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

No

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

Yes

**Identify the operator.**

Contractor

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

New

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

No

**Indicate the following reason(s) for updating this PIA.**

**Describe the purpose of the system.**

Turnthetiderx.org is a website on which health practitioners will be able to fill out a form to take a pledge to help end the opioid crisis through education and safe prescription practices. Health practitioners will also be able to utilize the site to share prescription experience stories and sign up to receive communication regarding campaign updates. The site will also contain aggregate demographic data regarding those who have taken the pledge.

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

Using the Wordpress content management system, turnthetiderx.org will be capturing first name, last name, email, profession, zip code, and specialty, as well as qualitative stories.

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

Turnthetiderx.org will utilize the Wordpress content management system (CMS) platform and hosted in Rackspace Hosting. Any PII and data will technically reside in Rackspace as that is where the database is hosted. The site will be collecting PII elements such as first name,,last name, email,,profession, zip code, and specialty. This collection will be available publicly to medical practitioners that visit the site to take a pledge to help end opioid abuse. This information collection is completely optional. There is a second form on the site that collects stories outlining the impact of opioid abuse and the needs of practitioners to end it. This form also collects full name and email to attribute the story to and contact for publishing approval. This completely optional form explicitly states that the stories may become publicly available with the consent of the author.

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

Yes

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

Name

E-Mail Address

Zip Code

Medical Profession

Medical Specialty

User Credentials

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

Employees

Public Citizens

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

50,000-99,999

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

The PII will be used to compile aggregate demographic information and will not be used for identification on an individual basis.

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

Emails will be used to contact pledge-takers to educate and inform them regarding news and events.

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

Title 42 of the United States Code (sections 300u(a)(8) and 300u-3)

**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

**Non-Governmental Sources**

Public

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

An emergency OMB information collection approval is in progress and is projected approved June 7th, 2016.

**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.**

The forms themselves are collecting personal information and each collection field is titled accordingly. There is also a privacy statement on the site explaining the information collection.

**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.**

Health Practitioners can choose not to fill out the form as it is voluntary.

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

There is no process to notify and obtain consent individuals regarding major changes to the system as there will be no major changes taking place during the lifecycle of the system. Should there be an unforeseen major change to the system, we will utilize the provided email addresses to notify individuals whose PII is in the system.

**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 may contact the initiative by emailing [turnthetiderx@hhs.gov](mailto:turnthetiderx@hhs.gov) if they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

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

The Office of the Surgeon General will retrieve the PII from the Wordpress CMS on a regular basis. Data integrity is not a high concern as the effectiveness of the system does not rely on the accuracy of the data. Emails that bounce back will be removed according to the retention schedule.

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

Only Office of the Surgeon General Administrators will be able to access the PII in the system. These administrators need access to retrieve the PII and create aggregate demographic data and to maintain communication with the public. There is an agreement in place that no partners nor contractors will be accessing the PII in the system.

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

Only Office of the Surgeon General Federal Employees will be administrators and will access the PII to send emails. There is an agreement with any developer or non-profit partner entity that may have technical access to the PII that they will not access the PII.

**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.**

Only certain employees of the Office of the Surgeon General will be given access to the PII. These certain employees include a few involved in administering the campaign.

**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.**

There will be training sessions for the handful of system administrators that will be able to access the PII. There is also an annual mandatory HHS privacy and security training that all system administrators will take.

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

Web developers hired through the non-profit agreement will provide technical guidance and assistance to the Office of the Surgeon General regarding usage.

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

No

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

The PII records will be retrieved by the Office of the Surgeon General and a retention schedule is currently being initiated by the Records Management office.

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

Form entries filled out by medical practitioners will go directly into a content management system on a third party hosting server. Controls include strong password enforcement, two factor login authentication, server firewalls, and industry standard hardware security.

**Identify the publicly-available URL:**

<https://turnthetiderx.org>

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?**

No

**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