

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

September 17, 2015

**OPDIV:**

CMS

**Name:**

Qualtrics

**TPWA Unique Identifier:**

T-9830368-261543

**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

**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

**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 Health Insurance Marketplace (HealthCare.gov) uses Qualtrics to gather feedback from Healthcare.gov visitors to gauge overall satisfaction with the website and to find out how we can improve the consumer experience. Feedback collected is general consumer feedback information via multiple-choice questions such as, "What is your feedback about?" "How can we improve this page?" and "Did you find the information helpful?" Consumers provide feedback through online surveys facilitated by the Qualtrics tool. These surveys are anonymous and not associated with a Consumers account or application. Persistent cookies can be stored on a user's local browser and are used to ensure a consumer cannot fill out a feedback survey multiple times. Qualtrics cookies are stored for one year. Qualtrics' privacy policies, notices from HealthCare.gov, information published by Qualtrics about its privacy policies, and the ability for consumers to opt-out of providing their information to Qualtrics maximizes consumers ability to protect their information and mitigate risks to their privacy.

The CMS staff analyze and report using the collected data from Qualtrics. The reports are available only to CMS managers, teams who implement Federally Facilitated Marketplaces programs represented on HealthCare.gov, members of the CMS communications and web teams, and other designated federal staff and contractors who need this information to perform their duties.

**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:**

If consumers do not want Qualtrics to collect information about their device, consumers can choose not to take a HealthCare.gov survey or they can use the HealthCare.gov privacy manager to opt-out website analytics tools.

Survey questions are used to improve the online application process and are not applicable to alternative application channels.

**Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?**

No

**How does the public navigate to the third party Website or application from the OPIDIV?**

The public does not navigate to Qualtrics. Qualtrics is embedded into HealthCare.gov pages.

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

The public does not navigate to Qualtrics. Qualtrics is embedded into HealthCare.gov pages.

**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?**

No

**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.healthcare.gov/privacy/>

**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:**

CMS does not collect any PII through the use of Qualtrics.

**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:**

PII is not stored or shared.

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

No PII is shared with CMS.

**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:**

Not applicable.

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

CMS will use of Qualtrics in a manner that protects the privacy of consumers who visit HealthCare.gov and respects the intent of HealthCare.gov users. CMS will conduct periodic reviews of Qualtrics' privacy practices to ensure its policies continue to align with agency objectives and privacy policies and do not present unreasonable or unmitigated risks to consumer privacy. MixPanel is employed solely for the purposes of improving CMS' services and activities online related to operating HealthCare.gov. Information collected by Qualtrics is created and maintained by Qualtrics.

**Risk #1:**

Persistent cookies are used with third-party tools on HealthCare.gov and can be stored on a user's local browser. Qualtrics cookies are stored for one year.

**Mitigation:**

Qualtrics' privacy policies, notices from HealthCare.gov, information published by Qualtrics about its privacy policies, and the ability for consumers to opt-out of providing their information to Qualtrics maximizes consumers ability to protect their information and mitigate risks to their privacy.

Additionally, Qualtrics' surveys are voluntary and consumers can choose not to participate in surveys. CMS has configured its use of Qualtrics to mask IP addresses before being stored to add additional safeguards to ensure that this data cannot be connected with other data in order to identify a consumer who completes a survey supported by Qualtrics. In some cases, consumers may volunteer PII information in the free text field of surveys. If HealthCare.gov staff see this occur, HealthCare.gov staff or their contractors delete this information from the Qualtrics system.

**Risk #2:**

CMS also recognizes that if Qualtrics is not implemented correctly in relation to HealthCare.gov, personal information could be collected about HealthCare.gov visitors.

**Mitigation:**

Therefore, to mitigate this risk, CMS only allows a limited number of trained and credentialed staff or contractors to implement Qualtrics.