

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

September 11, 2017

OPDIV:

OS

Name:

Assistant Secretary for Preparedness and Response GitHub

TPWA Unique Identifier:

T-8011716-593295

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.

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).

Expiration Date: 1/1/01 12:00 AM

Describe the plans to obtain OMB clearance.

Explanation: 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:

Biomedical Advanced Research and Development Authority (BARDA) seeks to use a cloud-hosted service provided by GitHub to enable storing, versioning, and sharing source code, supporting data files, and analytic results developed by BARDA federal and direct contract staff. GitHub is an industry standard platform for collaborative development of software and analytic tools that allows each analyst to easily identify and track what changes are made to their analytic code and by whom. This capability allows both improved fidelity of analyses by supporting analytic code sharing, reviewing, and updating, as well as traceability of the origin of changes if updates are required due to changing scientific information. This improved fidelity and traceability for analytic processes enables BARDA to conduct faster and more robust modeling and analyses for the medical and public health consequences, medical countermeasure needs, and medical countermeasure advanced research and development needed for Assistant Secretary for Preparedness and Response (ASPR) and HHS to respond to public health disasters, including pandemic influenza and emerging infectious disease outbreaks and intentional chemical, biological, radiological, and nuclear terrorist attacks.

Sharing with GitHub will be between government employees and direct government contractors for private repositories, and will permit sharing of code and analytic results with the public for public repositories, only after underlying information has been cleared for public release, usually through the peer-reviewed publication process.

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:

Published code and analytic results will be available through the journal, and can be distributed directly to interested members of the public via a request to the communicating author of the publication. Electronic versions of journal articles will be provided open source through the National Center for Biotechnology Information (NCBI- www.ncbi.nlm.nih.gov) and paper copies will be available from the journal publisher.

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?

Other...

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

The web link to published studies and the associated code and analytic results will be available both as a directly listed URL in the publication and on the HHS site for the division, with clear statement that it is navigating to a third party 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?

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.hhs.gov/privacy.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:

The GitHub website maintains access control to their service, requiring individual HHS users to setup a username and password tied to a valid email address.

BARDA personnel have no control over or access to this centralized server housing this information, and all information is voluntarily provided to use the system. Members of the public are not creating user accounts; the user accounts are limited to HHS personnel.

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 type of PII that HHS employees will share with GitHub include username, password, email address, First name, and Last name. This information will only be shared with the system administrators (the vendor) for GitHub, and is used for account creation and credential verification.

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

GitHub's user policy and privacy policy detail their use of the data. If an individual does not feel comfortable with providing the information to GitHub, alternate methods of receiving access to the HHS information are possible via private repositories, and public repositories can be viewed without providing PII to GitHub.

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:

GitHub's user policy and privacy policy detail their use of the data. HHS employees provide their name and create user credentials on a voluntary basis in order to view publicly accessible information.

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

To mitigate any other privacy risks, individual PII and proprietary data will not be maintained on GitHub.