

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

January 14, 2026

OPDIV:

IHS

Name:

Elsevier Skills and eLearning

TPWA Unique Identifier:

T-1670510-508556

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: null

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:

Elsevier Performance Manager is a cloud-based learning and competency-management platform that combines learning management (LMS) functionality with tools for staff performance evaluation, competency tracking, and compliance management. Elsevier Skills & eLearning sets of online clinical-training tools and competency-management systems that will be used for clinical education, continuing education (CE), orientation, and professional development.

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:

N/A This site provides training for staff to complete trainings to meet federal, state, CMS, and Joint Commission standards.

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?

The public is not able to navigate to this site.

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

The website is not available to the public, staff are provided a link that is maintained on service unit 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?

No

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.ihs.gov/privacypolicy/>

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?

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:

The OPDIV enters staff names, departments, and start dates in the system. The information is stored on the website and is not shared with other entities outside of the OPDIV. The public does not have access to this site.

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 limited to staff full names, enter on duty dates for their current position, and department. The information is utilized internally. Elsevier hosts the site and platform, but does not share any of the information. The information would also be shared with regulators to prove required trainings were completed. Regulators include representatives from Centers for Medicare & Medicaid Services, The Joint Commission, and Occupational Safety and Health Administration. This would also include any other federal or state entities requiring verification and documentation of mandatory trainings.

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

Reports can be provided as excel spreadsheets and the first name could be changed to first initial, if

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:

Access to the site is only available to staff and the third-party host

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

There are no known privacy risks. Nor have there been any issues since the initial contract with this vendor in 2021.