

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

April 07, 2025

OPDIV:

OS

Name:

Office of Unified Web Google Analytics 4 (GA4)

TPWA Unique Identifier:

T-5577099-826357

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:

The purpose of the use of the third-party application (Google Analytic 4 (GA4)) is to collect both the Office of Unified Web (OUW) General Support System (GSS) website and app data to better understand the customer journey. GA4 uses event-based data to understand how users navigate and engage with a site or app. GA4 tracks actions like clicks, purchases, and scrolls, rather than sessions. GA4 includes cookie-less measurement and other privacy protections. GA4 uses artificial intelligence (AI) and machine learning to make predictions when data is limited through features like Analytics Intelligence and predictive audiences.

AI Narratives for GA4 is an app that uses data from Google Analytics (GA) to generate actionable data narratives. It provides reports, insights, and alerts in plain English to help marketers understand key metrics, anomalies, and outliers regarding their website's performance.

The Third-Party Website and Application (TPWA) Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks.

The known use cases for GA4 are -

Anomaly Detection and Issue Resolution : GA4 AI uses machine learning to identify trends that are unexpected in website traffic and user behavior – otherwise known as anomalies.

Predictive Analytics for Conversion Optimization: GA4 elevates conversion optimization through the use of predictive metrics. This feature will help you focus on marketing efforts with high predicted revenue and low churn probability.

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:

The public does not have an alternative means to this application, as it is a back-end analytics application.

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 OPDIV?

Other...

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

The public do not navigate to the GA4 third-party application. When users visit the OUW GSS websites, the GA4 application will collect both the OUW GSS website and app data to better understand the customer journey.

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.hhs.gov/privacy.html>

Is an OPDIV Privacy Notice posted on the third-part website or application?

Yes

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:

In google Analytics, there is no PII published. Only the developer has the capability to write code that will override and publish PII to the site. The public cannot publish PII to google Analytics. Google Analytics have some features for Data Redaction, IP Anonymization.

Automatic Email Redaction: GA4 can automatically identify and redact email addresses found in URL parameters or page titles. This ensures that even if email addresses are inadvertently included in the data, they are removed before being stored.

URL Query Parameter Redaction: GA4 allows you to specify up to 30 URL query parameters that you want to redact. This is useful for removing any PII that might be present in URL parameters, such as names, addresses, or user IDs.

GA4 provides controls to disable the collection of granular location and device data. This can help to further limit the potential for PII collection.

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:

No PII shared in Google analytics 4 (GA4)

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

No, PII is not shared with any HHS OUW system and has no intended or expected use of the PII

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:

No, PII is not used or maintained on HHS OUW.

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

N/A