

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

June 30, 2025

**OPDIV:**

OS

**Name:**

PSC FOH MicroBuilder

**TPWA Unique Identifier:**

T-3420728-399322

**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: 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:**

MircroBuilder will be used to create Test/Exams for Nurses. The users are all internal and will only access test Materials through Learning Portal (LMS). we do not house any documents. Access is authorized through Access Management System (AMS).

**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:**

This instance of the site is only used by federal employees and direct contractors, access is by invitation only.

**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 doesn't navigate to the third-party website specific to LMS. You can only access the site if you are invited to it.

**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?**

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?**

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:**

PII collected is the employee's Name, their issued HHS government e-mail addresses, Testing ID, Manager Name, and Site code.

**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 system will integrate data into the Learning Management System (LMS).

Names and E-mail addresses are used for account creation only and logging in.

Testing ID: This will serve as a unique identifier to maintain privacy, with the option to replace it with individual names if necessary.

Manager Name: Information regarding the nurse's direct supervisor.

Site Code: To identify the specific location associated with the nurse.

Email Address: For communication and system notifications.

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

MicroBuilder and LMS have appropriate security, administrative, and technical controls in place.

**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:**

To protect customer's Data, Micro Builder is complaint under General Data Protection Regulation (GDPR) and SOC 2.

SOC stands for “System and Organization Controls” and is a framework governed by the American Institute of Certified Public Accountants (AICPA).

The AICPA has defined five Trust Services Criteria (TSC) that service organizations can choose to meet: Security, Availability, Processing Integrity, Confidentiality, and Privacy.

Once the TSCs have been chosen, the service provider must define controls to ensure that those criteria are met. For instance, to meet the Security criterion, a service provider might define a control that requires access to all sensitive internal systems to be protected by multi-factor authentication.

#### Data Security Measures

**Access Controls:** Strict access control policies ensure that only authorized personnel can access personal data.

**Encryption and Anonymization:** Personal data is encrypted in transit and at rest, and anonymization or pseudonymization is used where appropriate.

**Incident Response Plan:** We have a comprehensive incident response plan to detect, respond to, and recover from data breaches promptly.

**SOC 2 Compliance:** We have substantially implemented SOC 2 security standards to strengthen our data security framework and ensure the confidentiality, integrity, and availability of personal data.

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

There are no other privacy risks.