
Privacy Impact Assessment (PIA) for Third-Party Websites and Applications (Social Media Sites)

Authorities: The Privacy Act of 1974 (*as amended*); the E-Government Act of 2002; OMB M-10-22, "Guidance for Online Use of Web Measurement and Customization Technologies" (6-25-10); and OMB M-10-23, "Guidance for Agency Use of Third-Party Websites and Applications." (6-25-10)

Note: In addition to completing a PIA, New Social Media platforms must be approved by the IRS Social Media Governance Council. If your organization has not received approval, complete the **New Media Use Authorization Form**.

Date (*mm/dd/yyyy*)

04/29/2015

Section I - Introduction

1. Provide the Full Name the IRS will use for the Third-Party Website or Application or Social Media site (*hereinafter*, "Social Media site"), and Acronym ("*IRS Recruitment*")

internalrevenueservice.tumblr.com / IRS Tumblr

2. What type of Social Media site will be used

- Facebook You Tube Twitter iTunes (*podcasts*) Web 2.0 application
- Other Tumblr

Section II - About the Social Media Site

4. Will personally identifiable information (PII) become available to the IRS through public use of this social media site Yes No

If yes, list all PII that is likely to become available (*i.e.*, names, avatars, email addresses, photos, etc.)

User names appear when a visitor likes or reblogs one of our Tumblr posts.

a. Will the public be able to respond or interact with comments or questions Yes No

If yes, how

b. Will the public need to identify their email address or other address if they request services Yes No

**If you answered yes to any part of Question 4, a full PIA is required.
Please complete the remainder of this questionnaire.
If no, stop and explain how no PII is available here, and submit for review.**

5. What is the IRS intended or expected use of the PII? Be specific. This answer must map to the mission or goals of the agency
The IRS will not enable the "ask me" and Discuss" comments features on this site. Anyone visiting the site will have the option to "reblog" with a short comment, but those comments appears on their page, not the IRS page.

IRS will not collect the PII in the form of user name from likes and reblogs on the site.

a. Will the site be used to solicit feedback? (*OMB M-10-23 requires that if an agency uses a third-party service to solicit feedback, the agency should provide an alternative government email address where users can also send feedback*) Yes No

b. If the answer for 2a. above is yes – provide information on the IRS.gov website or email address where users can send feedback

6. With whom will the IRS share the PII

- a. Within the IRS business owner's offices
- b. IRS research/statistical data gathering
- c. Other IRS offices (*list*)
- d. Other federal or state government agencies
- e. Other outside entities

Note: Follow number 7 retention schedule instructions only if site will interact with public (*contact AWSS Records & Information Management Services (RIM) to determine if the interaction constitutes "record keeping"*)

7. What are the plans to maintain the PII information collected, used or stored? (*Follow approved records retention schedule below if site will interact with public. Contact the IRS Records and Information Management (RIM) Program Office with recordkeeping questions*)

No PII is collected, used or stored. Records of our posts are saved as PDF files on a SharePoint site in six-month periods for one year. PDF files do not contain user names or any other PII.

Records Control Schedule (RCS) 17, item 34 for IRS Interactive Networking Site Use Records (to be published in RCS Document 12990 when next updated):

Records documenting activity on social networking sites where interaction with site users and IRS occur. Activity capture records include periodic and/or scheduled screen shots detailing content posted by IRS; links to content hosted on IRS-owned web sites; discussion topics posted by IRS; comments to IRS posts/discussions by users subscribed to networking sites/services, and; comments posted by IRS employees. (Job No. DAA-0058-2013-0003)

Disposition: Temporary.

Cut off 6 months after the beginning of the FY.

Delete/Destroy 6 months after cutoff.

Note: Some networking sites are used by IRS strictly for publishing information that is already scheduled and maintained in accordance with previously approved RCS items (including IRS.gov). See RCS Document 12990 for approved disposition instructions for recordkeeping/official copies of those documents. For records that do not have a previously approved schedule, or do not meet the above Networking Site criteria, please contact the RIM Program Office for retention assistance.

a. Site the authority to retain/dispose of the PIA data

- RCS 17, item 34 for IRS Interactive Networking Site Use Records
- Other (explain, and cite authority or provide proposed retention)

b. Cite the authority to retain the PII. RCS 17, Item 33, IRS Interactive Networking Site Use Records (*DAA-0058-2013-0003, Pending National Archives and Records Administration approval*)

Records Schedule Number DAA-0058-2013-003, as approved by the National Archives and Records Administration

c. Describe where the PII data will be stored, who will have access to it, and the purpose. (*Collection, use, retention, and disclosure of personally identifiable information will be limited to what is minimally necessary for the specific purposes for which it was collected, unless specifically authorized or mandated by law*)

No PII data is stored.

d. How will the PII be eliminated at the end of the retention period? (*All records housed in the system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6 Managing Electronic Records*)

Not applicable, as no PII data is stored.

8. How will the IRS secure the PII that is used, maintained or provided? (*Be specific to ensure the security controls meet Cybersecurity and other Federal security authorities*)

Not applicable, as no PII data is stored.

9. List any other privacy risks that may exist, or be inherent in a social networking environment
Because comments are disabled, there is no risk of viewers posting PII or other private information on the site.

a. What are the IRS plans to mitigate those risks

10. Does this social media site use any means to track visitors' activity on the Internet? (Note: the executive owner must ensure that the website is in full compliance with OMB M-10-22 "Guidance for Online Use of Web Measurement and Customization Technologies including #3, "Appropriate Use and Prohibitions") Yes No

a. If yes, indicate means
Tumblr uses session cookies as explained below.

b. Persistent cookies Yes No

If yes, state authority & provide reason

c. Web beacons Yes No

If yes, state authority & provide reason

d. Session cookies Yes No

If yes, state authority & provide reason

Tumblr's privacy policy explains: "We use cookies and web tags to enable our servers to recognize your web browser and tell us how and when you use the Services, as described above in "Information Related to Use of the Services." Our cookies do not, by themselves, contain information that personally identifies you, and we don't combine the general information collected through cookies with other such information to tell us who you are. However, we do use cookies to identify that you have logged in, and that your web browser has accessed the Services, and we may associate that information with your Account if you have one."

e. Other (i.e. Google Analytics) Yes No

If yes, describe, state authority & provide reason

IRS uses Google Analytics to track referrals to the Tumblr site, length of visit, page views to determine how visitors arrive to the site and what pages they view. Demographic and other personal data about visitors is not collected.

11. Specific purpose of the IRS Use of the Social Media Site (Provide a clear, concise description of the social media site and why it's needed.
Explain the benefits to the Mission of the Service)

The IRS aims to engage citizens' interest using Tumblr to share information such as tax tips, articles and rich media content with a variety of different communities (for taxpayers, partners, tax professionals and other stakeholders). The IRS posting content on this platform will allow other users to reblog (at their own site) and share official IRS content on their tumblelogs, thus increasing the reach of IRS communications. Connecting with citizens in this social media environment will grant the opportunity for the posted IRS content to be shared virally and ultimately direct citizens to official tax information. However, there will be no interaction with viewers. The public who freely chooses to visit the website will not be able to leave messages or comments. No IRS Code 6103, SBU or PII will be collected, used, shared or stored on viewer or visitors of the site.

12. Requested operational date

Ongoing -- PIA is being updated

13. List all System of Records Notices (SORN) that apply (contact Treasury/IRS 00.001 Communications to verify SORN listing prior to PIA submission)

Section III - General Requirements

14. Third-Party privacy polices

a. The IRS business owner has examined the third party's privacy policy and has evaluated the risks and has determined whether the social media site is appropriate for the IRS use Yes No

- b. The IRS business owner will monitor any changes to the third party's privacy policy and periodically reassess the risks involved Yes No

15. External links

- a. The IRS business owner will assure that if they posts a link that leads to a third-party website or any other location that is not part of an official government domain, the agency will provide an alert to the visitor, such as a statement adjacent to the link or a "pop-up" explaining that visitors are being directed to another government website that may have different privacy policies from those of the agency's official website Yes No

16. Embedded applications

- a. If the IRS business owner incorporates or embeds a third-party application on its website or any other official government domain, the IRS business owner will take the necessary steps to disclose the third party's involvement and describe the IRS privacy requirements in its Privacy Policy notice, as specified by OMB M-10-23 Yes No

17. Agency branding

- a. The IRS business owner will follow guidance that suggests that when an agency uses a social media site that is not a part of an official government domain, the IRS will apply appropriate branding to distinguish the agency's activities from those of nongovernmental actors. For example, to the extent practicable, the IRS business owner will assure that the IRS Seal or emblem will be added to its profile page on a social media site to indicate that it is an official IRS agency presence Yes No

18. Information collection

- a. If information is collected through the IRS use of a social media site, the IRS business owner will assure that they collect only the information "necessary for the proper performance of agency functions and which has practical utility." If PII is collected, the agency will collect only the minimum necessary to accomplish a purpose required by statute, regulations, or executive order Yes No

19. Privacy policy notice requirements

- a. The Business Owner of this social media site agrees to maintain an IRS approved Privacy Notice plus links to irs.gov and the IRS Privacy Policy on the front page of the website. This Notice will "stand alone" and not be combined into other background information. See guidance below Yes No

If no, explain the reason why a Privacy Notice is not required

Privacy Notice Guidance

Privacy Notice: This service is controlled and operated by a third party and is not an official government website. By interacting with the IRS through this service, you may be providing non-government third parties access to your personal information. The IRS does not keep or share any personally identifiable information that you provide through this service. The IRS strongly discourages you from providing sensitive personally identifiable information (*such as your social security number or tax account information*) and will delete any comments containing such information without responding

www.irs.gov

[Privacy Policy](#)

Note: Office of Privacy Compliance reserves the right to request copies of the following:

- A copy of Terms of Service Agreements
- A copy of the Privacy Act Notice that will be used

Section IV - Other

20. List the names of any other social media sites owned or maintained by the Business Unit, if known. Please provide full names and date of operation

Two Tumblr pages (internalrevenueservice.tumblr.com and IRSenEspagnol.tumblr.com) in operation since 2012 and 2014, respectively

Three Twitter accounts in operation since 2012: @IRSnews, @IRStaxpros and @IRSEnEspagnol

One Facebook page (www.facebook.com/IRS) in operation since 2010

Three YouTube accounts (IRS Videos, IRS Multilingual and IRS ASL) in operation since 2009
