Social Media PCLIA Report

Date of Approval: February 13, 2018 Survey PCLIA ID Number: 3080

A. Site Description

1. The full name and acronym for the Social Media site, Third Party Website, or Application. IRS Return Preparer Office Facebook Page, None

Note: the remaining questions will be simplified to Social Media site (vs. Third Party Website or Application)

- 2. Is this a new Social Media site? No
 - 2.b. If no, is there a PCLIA for this Social Media site? Yes
- 2.b.1. If yes, enter the full name, acronym and PCLIA ID of the most recent Social Media PCLIA. <u>IRS Return Preparer Office Facebook Page, None</u>
 - 2.b.2. If yes, enter the approval date of the most recent Social Media PCLIA. 8/29/2014
 - 2.b.3. If yes, indicate which of the following changes occurred to require this update. (Check all that apply)

No : Addition of PII

No: Conversions

No: Anonymous to Non-Anonymous

No : Significant System Management Changes

No : Significant Merging with Another System

No: New Access by IRS Employees or the Public

No : Addition of Commercial Data or Resources

No: New Interagency Use

No: Internal Flow or Collection

No: Other

3. What type of Social Media site will be used? (Facebook, YouTube, Twitter, Linkedin, Other) Facebook

A.1 General Business Purpose

- 4. What is the specific business purpose of the IRS use of this Social Media site? Provide a clear, concise description of the Social Media site, the reason for the site, and the benefits to the IRS mission. The purpose of the Return Preparer Office Facebook page is to provide an opportunity to directly communicate with and engage the more than 34,000 return preparers who have identified themselves as Facebook users. Through group discussions, wall posts, videos and notes, RPO can promote key initiatives; communicate requirements, processes and events; gauge sentiment and address concerns; determine areas of improvement and provide clarity and answer questions.
- 5. Is the Social Media site operational? Yes

B. PII Details

6. Will Personally Identifiable Information (PII) become available to the IRS through public use of this Social Media site? Yes

6.a. If yes, check all the (PII) that is likely to become available

Yes : Name Yes : Location Yes : Picture

Yes: Contact Information

Yes : Employer Yes : Education Yes : Other

- 6.a.1. For other, List all other PII <u>They may also provide information on their activities</u> and interests. Facebook "friends" may be viewable to other "friends," including all the PII information they provide about themselves, depending on how the user sets up his or her Facebook account.
- 7. Will the public be able to respond or interact with comments or questions? Yes
 - 7.a. If yes, how? The intent of the page is to engage with tax professionals and to allow them to comment upon our actions. However, it is not our intent to use this page as a substitute for official feedback or comments made through www.irs.gov. Each proposed regulation contains a comment email address.
- 8. Will the public need to identify their email address or other address if they request service? No

B.1 About the Social Media Site

- 9. Does the IRS intend or expect to use the PII? No
- 10. Will the IRS share the PII? No

C. Privacy Act & System of Records Notice

11. Is there a System of Records Notice(s) or SORN(s) that addresses the PII records in this site? Yes

If yes, enter the SORN number(s) and the complete name of the SORN(s)

SORNS Number SORNS Name

00.001 Treasury/IRS Communications

Treas/IRS 10.004 Stakeholder Relationship Management and Subject Fi

D. Responsible Parties

12. Identify the individuals for the following Social Media site roles: (System Owner = Social Media Website Owner or Executive) ## Official Use Only

I.1 Records Schedule

- 13. Will your site interact with the public? Yes
 - 13.1. If yes, what are the plans to maintain the PII collected, used, or stored? The Return Preparer Office will not solicit, accept or maintain any PII on the Return Preparer Office Facebook page other than the Facebook user name of persons who post comments on the page. Any comments containing PII other than Facebook user name are removed from the page.
 - 13.2. If yes, cite the authority to retain/dispose of the PII. RCS 17, item 34 for IRS Interactive Networking Site Use Records
 - 13.3. If yes, describe where the PII data will be stored, who will have access to it and the purpose.

Daily screenshots of the Return Preparer Office Facebook pages and its content will be retained for a period of six months after the cut-off date. Comments being deleted will be first copied and pasted into a Word document for archival and FOIA purposes. Those documents will be retained in chronological order. The Word document is saved and it is deleted after six months.

13.4. If yes, how will the PII be eliminated at the end of the retention period? Electronic records will be deleted.

O. Tracking

14. Does this Social Media site use any means to track visitors' activities on the Internet? Yes

Yes Session Cookies

14.a.3. If selected, state authority & provide reason. According to the Facebook Data

Use Policy, "We use these technologies to do things like make Facebook easier or faster
to use; enable features and store information about you (including on your device or in
your browser cache) and your use of Facebook; deliver, understand and improve
advertising; monitor and understand the use of our products and services; and, protect
you, others and Facebook."

P. Privacy Policy

15. Has the IRS Business Owner examined the Third Party's Privacy Policy and evaluated risks? Yes

15.a If yes, is the Social Media site appropriate for IRS use? Yes

- 16. Will the IRS Business Owner monitor any changes to the Third Party's Privacy Policy and periodically assess the risks involved? Yes
- 17. Can the IRS Business Owner assure that if a link is posted that leads to an external Third Party website or any other external location that is not an official government domain, the agency will provide a pop-up alert to the visitor explaining that they are being directed to another website that may have different Privacy Policies? Yes
- 18. If the IRS Business Owner incorporates or embeds a third-party application on its website or any other official government domain; will the IRS Business Owner 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

P.1 Data Security

- 19. How will the IRS secure the PII that is used, maintained, or provided? (Be specific to ensure the security controls meet Cyber Security and other federal security authorities.) All Facebook sites are public, including those maintained by government agencies. Facebook users choose to take part in discussions and freely provide information. The IRS Return Preparer Office will use periodic message posts to notify public users that they must not provide identifying information about anyone else other than themselves, and the consequences if they do.
- 20. Are there any privacy risks that may exist or be inherent in a social networking environment? Yes
 - 20.a.1. If yes, list the risks. <u>A return preparer, or any public member of the Facebook site, could deliberately or inadvertently disclose taxpayer information.</u>
 - 20.a.2. If yes, what are the plans to mitigate the risks? The Return Preparer Office will work with the IRS Chief Counsel's office to formulate a policy to deal with anyone who discloses information about a taxpayer and publish that information for the site's users to view

Q. General Requirements

- 21. Will the IRS Business Owner follow guidance that suggests 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
- 22. If information is collected through the IRS use of a Social Media site, will the IRS Business Owner assure that they collect only the information "necessary for the proper performance of agency functions and which has practical utility"? Yes
- 23. If PII is collected, will the Business Owner assure that the agency collect only the minimum necessary to accomplish a purpose required by statute, regulations, or executive order? Yes

R. Privacy Notice

- 24. Does the Business Owner of this Social Media site agree to maintain an IRS approved Privacy Notice that will "stand alone" and not be combined into other background information? (Privacy Compliance & Assurance may request copies of the Terms of Service Agreements and/or the Privacy Notice.) Yes
- 25. Can the Business Owner confirm that links to IRS.gov and the IRS.gov Privacy Policy will be placed on the front page of the website? Yes

K. Other Sites

26. Are there any other Social Media sites owned or maintained by the Business Unit? No

M. Civil Liberties

- 27. Does the Social Media site maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech and of the press, and freedom of assembly and petition)? No
- 28. Will this Social Media site have the capability to identify, locate, and monitor individuals or groups of people? \underline{No}

End of Report