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

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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*)

01/25/2016

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## Section I - Introduction

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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*")

NinaOlson and YourVoiceAtIRS

2. What type of Social Media site will be used

- Facebook       You Tube       Twitter       iTunes (*podcasts*)       Web 2.0 application
- Other    Medium ([www.Medium.com](http://www.Medium.com))

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## Section II - About the Social Media Site

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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.*)

Names may be publicly available if the user has not created a unique username. Individuals may opt to upload photos to their profile as well. Based on a specific post, a user could create comments that might include PII that they have provided.

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

If yes, how

Users can leave comments and highlight different sections of any given post. Comments can be removed by an administrator of Medium if TAS requests them to be deleted.

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. We have no intent of collecting any PII. This is a social media site to share content regarding TAS. We are not requesting any information be provided.

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*)

If PII is identified in a post, we will request that it is removed by Medium right away. TAS has no intent of maintaining or storing 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*)

TAS has no desire to retain or maintain PII.

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*)

N/A - TAS has no desire to retain or maintain PII.

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*)

It will be deleted when identified on the Medium site by a site administrator.

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*)

N/A - TAS has no desire to retain or maintain PII.

## 9. List any other privacy risks that may exist, or be inherent in a social networking environment

The only risk identified is the ability for a Medium account holder to comment on a TAS post and provide PII.

## a. What are the IRS plans to mitigate those risks

TAS will monitor and tag all posts so we will know when comments are made. If any information is PII, we will go to a Medium administrator and request immediate removal.

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

From the Medium website:

We collect information about what Medium pages you access or visit, information about your mobile device (such as device or browser type), information volunteered by you (such as through registration), the URLs of websites that referred you to us, and e-mail addresses of those who communicate with us via email.

When you log into Medium Services or load a web page from Medium Services, we collect and store your Internet Protocol address. We may use this information to fight spam, malware, and identity theft; to personalize Medium Services for you; or to generate aggregate, non-identifying information about how people use Medium Services.

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

From the Medium website:

Most browsers have an option for disabling cookies, but if you disable them you won't be able to log into your Medium account, and won't be able to use the vast majority of Medium Services.

We respect [Do Not Track](#) ("DNT") settings in browsers. If you are logged out of our services and have DNT enabled, we will not set cookies that can be used to aggregate information about your usage. We may use some cookies to enhance your experience by storing preferences or options. Again, you must have cookies enabled in order to log into our services.

Some third-party services that we use, such as [embed.ly](#), may place their own cookies in your browser. Note that this Privacy Policy covers our use of cookies only and not the use of cookies by third parties.

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

If yes, describe, state authority & provide reason

Unknown based on website research.

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)*

To educate the public on the purpose and services that are provided by the Taxpayer Advocate Service and communicate key messages through a widely distributed social media channel. Medium provides a unique platform already being utilized within government (White House, OPM, etc.) to speak to a broad range of engaged citizens.

## 12. Requested operational date

January 22, 2016

13. List all System of Records Notices (SORN) that apply *(contact David Silverman to verify SORN listing prior to PIA submission)*

N/A

**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

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**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](http://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

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**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

YouTube, Facebook, Twitter (all have been authorized by IRS for use).