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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*)

9/8/2014

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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*")

@IRStaxpros

2. What type of Social Media site will be used

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

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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.*)

Twitter user's Twitter name, first and/or last name, avatars and photos are all available if a Twitter user mentions @IRStaxpros in a tweet that they send. They may also have listed the city and state in which they reside on their profile, which is accessible by clicking on their user name.

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

If yes, how

Twitter users can reply to and retweet IRS messages with their own additional comments as long as the entire tweet falls within the 140-character limit. Twitter users can also ask questions or initiate comments and mention the @IRStaxpros feed. IRS social media policy does not permit Twitter channel managers to respond to replies or mentions.

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  
It is not our intent to share PII or any other taxpayer information. While we cannot control what information is provided by other Twitter users who mention the @IRStaxpros feed, we will not store the PII or retweet it via our feed so that it is publicly available to other Twitter users. When posted tweets identify potential taxpayer service, identity theft/scam trends or media inquiries, those tweets may be shared with a small group of individuals in W&I, PGLD, Online Services and/or C&L in order to research what may be going on and to develop additional taxpayer communication materials. If threatening statements are made via Twitter, those tweets, including the user name and location (if available), are shared with TIGTA.

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*) W&I Accounts Management, W&I C&L, Servicewide C&L, PGLD, Online Services
- d. Other federal or state government agencies TIGTA
- 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*)

The @IRStaxpros site will not interact with the public; however, tweets posted by @IRStaxpros will be archived and maintained for a period of 6 months. Emails sent as part of the process outlined in question 5 above are retained in an archived folder that is destroyed after a period of one year.

**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)

Cut off at the mid-point of the fiscal year and end of fiscal year; destroy batch files six months after cutoff

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*)

PII may be contained in emails that are sent to relevant business units as part of the process of following up/researching potential taxpayer service or identity theft/scam issues. The sent emails are archived on the branch chief's hard drive and cannot be accessed by anyone else. These emails are retained only for research purposes in the event the issues they identify recur.

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*)

Sent emails described in question 5 above are electronically archived for a period of one year, then destroyed.

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*)

The archived emails containing PII are located in an encrypted folder.

9. List any other privacy risks that may exist, or be inherent in a social networking environment  
Twitter users may inadvertently include PII in tweets that they post.

a. What are the IRS plans to mitigate those risks

IRS will direct message individuals who post PII and ask them to delete the tweet. IRS will also update the text on its profile page to alert Twitter followers that they should not post personal information.

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

Twitter uses cookies, log data and widget data to track users' activity. Twitter supports the "Do Not Track" option available to users who set up that option in their individual browsers.

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

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

If yes, describe, state authority & provide reason

The @IRStaxpros account uses Hootsuite to track the number of views, retweets and shares on each tweet that is sent out. In doing this, we are able to determine the type of information and/or format we need to post to keep our followers engaged.

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)*

IRS uses Twitter to share timely information for taxpayers about filing, tax tools and other initiatives, providing links to information on IRS.gov, the IRS YouTube channel and the IRS Tumblr page.

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](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

**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

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

One Tumblr page (internalrevenueservice.tumblr.com) in operation since 2012

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