

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

June 25, 2021

OPDIV:

OS

Name:

ASPA Tik Tok

TPWA Unique Identifier:

T-5592382-282227

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.

N/A

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: null

Does the third-party Website or application contain Federal Records?

Yes

Describe the specific purpose for the OPDIV use of the third-party Website or application:

The purpose of the proposed Tik Tok presence for HHS would be to expand the COVID Community Corps programming effort regarding current and future pandemic response and vaccination efforts, including the current push to get COVID vaccinations into the arms of at least 70 percent of the American adult population.

This public health initiative aims to reach teenage and young adult demographics who engage with TikTok's short form video platform and TikTok influencers, who are popular and resonant with their audiences both on and off the platform. The use of the TikTok platform would allow HHS to connect with and engage teenagers and young adults who have not yet received the Covid 19 Vaccination.

It is also an important platform for combating misinformation and disinformation, which are increasingly becoming barriers to vaccine uptake among certain audiences, specifically young adults ages 18-29. Sharing legitimate, fact-based information about vaccine safety and efficacy on TikTok and being able to engage with TikTok influencers and their audiences, will be a critical tool in fighting misinformation.

Digital Communication Division (DCD) will use TikTok to host and broadcast Department priority videos on the Internet for public viewing, comment, and engagement. Videos are hosted directly on TikTok and may be embedded on HHS priority websites and shared across other HHSgov social accounts to enhance content and allow users to interact with and share the information.

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:

Although the public would be able to obtain similar outreach from other HHS Social Media channels like YouTube, Instagram, or Facebook, the videos posted publicly on Tik Tok would have targeted videos aimed at teenage and young adult demographic.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?

Yes

How does the public navigate to the third party Website or application from the OPDIV?

Incorporated or embedded on HHS Website or from HHSgov social media channels

Please describe how the public navigate to the third-party website or application:

The public can navigate to the third-party website via a dedicated @hhs channel on tiktok when established, ie: <https://www.tiktok.com/@DeptHHS>. The public can access and discover videos on the TikTok app itself, or via videos that have been created with and uploaded to TikTok and subsequently shared outside of the website through links or video uploads on other social platforms or websites.

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 a nongovernmental Website?

Yes

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?

Yes

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.hhs.gov/web/policies-and-standards/hhs-web-policies/privacy/index.html>

Is an OPDIV Privacy Notice posted on the third-party website or application?

No

Is PII collected by the OPDIV from the third-party Website or application?

No

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:

The public can make available any personally identifiable information (PII) they would like using the comment feature on each video if this privacy feature is enabled. There is never any intended or expected use of public display of PII posted in comments.

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:

No PII collected or shared.

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

n/a

Will the PII from the third-party website or application be maintained by the OPDIV?

No

Describe how PII that is used or maintained will be secured:

No PII used or maintained.

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

Tik Tok is owned by Chinese national company ByteDance which is the current subject of a Presidential Executive Order for the Commerce Department review of security concerns posed by the app and others operated by Chinese national companies. A separate U.S. national security review of TikTok launched in late 2019 remains active and is ongoing. Until these security reviews are conducted by the Secretary of Commerce and all the national security risks posed by the application are determined, it is not possible to determine how these security and privacy risks will be mitigated.

June 9, 2021

Executive Order on Protecting Americans' Sensitive Data from Foreign Adversaries

<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/09/executive-order-on-protecting-americans-sensitive-data-from-foreign-adversaries/>

June 9, 2021

FACT SHEET: Executive Order Protecting Americans' Sensitive Data from Foreign Adversaries

<https://www.whitehouse.gov/briefing-room/statements-releases/2021/06/09/fact-sheet-executive-order-protecting-americans-sensitive-data-from-foreign-adversaries/>