

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

November 01, 2017

OPDIV:

OS

Name:

PartnersforGood (Twitter)

TPWA Unique Identifier:

T-5072331-243115

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.

Not Applicable

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: Not Applicable

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

No

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

The purpose of this twitter account is to communicate messages and information related to the HHS Partnership Center (also referred to as "The Partnerships Center" or "The Center for Faith-based and Neighborhood Partnerships at the Department of Health and Human Services"). The account can also share relevant information related to the federal agency network of Faith-based and Neighborhood Partnership Offices coordinated by the White House Office of Faith-based and Neighborhood Partnerships.

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:

<https://www.hhs.gov/about/agencies/iea/partnerships/index.html>

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

No

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

Incorporated or embedded on HHS Website

Please describe how the public navigate to the thirdparty website or application:

The Center's twitter page will be linked as (i) an external hyperlink from an HHS Website or Website operated on behalf of HHS (www.hhs.gov/partnerships) and (ii) incorporated or embedded on HHS Website (www.hhs.gov/partnerships). This will take individuals to the PartnersforGood page located at <https://twitter.com/PartnersforGood> .

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?

No

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:

http://www.hhs.gov/Privacy.html#third_party_websites

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

Yes

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:

By nature of Twitter, users may decide to display names, location information, and biographic information to the public. Alternatively, they may use pseudonyms or not share this information. Twitter collects these names, usernames, location information, websites and other biographic information about its users, which may be made available to The Partnerships Center when users interact with @PartnersforGood. However, the Partnerships Center does not intend to collect or distribute any Personally Identifiable Information (PII) on a private citizen or individual. Twitter reports compiled will redact PII about private citizens or individuals. Information may be gathered about associations, organizations, media outlets, government agencies, businesses or other large groups. The Partnerships Center may reply to or retweet public questions and general comments that mention @PartnersforGood. It will only, however, share information already made public by the user and any PII will be redacted.

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:

The Partnerships Center may reply to or retweet public questions and general comments that mention @PartnersforGood.

It will only, however, share information already made public by the user and any PII will be redacted. The purpose of this sharing is to engage and inform community stakeholders and be responsive to their reactions and needs. In addition, replying and retweeting supports one of our office's major goals of lifting up the best practices of our community partners and sharing those efforts with others. When we pose a question for followers to reply to, we may retweet the best answers (if they are appropriate: no promotion of own events, no controversial or political speech, etc.) so that our followers can see the responses of others and be prompted to respond to the question themselves. We may also retweet the posts of outside parties who retweet or promote specific HHS Partnership Center content. If a follower asks @PartnersforGood a generic question, to which the response would be helpful for all followers to read, we may reply to the person with the answer. This will be public and will show up on our Twitter account page. No information sent via direct (private) message will be shared with the public.

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

Not Applicable

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:

Not Applicable

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

As with other forms of social media, there is always risk that members of the public will willfully disclose-in this case, "tweet,"- private medical information over Twitter. Users understand, by nature of Twitter and its privacy clause, that this information is public. The Partnerships Center will not reply to or retweet any statements or questions that disclose personal medical information.