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

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*)

8/4/2014

Section I - Introduction

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*")

IRS Return Preparer Office Facebook Page

2. What type of Social Media site will be used

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

Section II - About the Social Media Site

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.*)

All Facebook members may elect (but are not required) to furnish the following types of PII: photo (themselves or someone/something else), birthdate, employer, education, relationship status, contact information, email address, phone numbers, address, city and state. They may also provide information on their activities 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.

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

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.

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 collect or share PII or any taxpayer information. It is our policy to delete any comments that contain PII and to store that deleted information on a single file on an encrypted IRS computer for FOIA purposes (with proper redaction). Facebook comments are checked daily in the days following a new post; at least twice a week during other times.

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 www.irs.gov; www.irs.gov/taxpros; www.irstaxforums.com

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*)

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.

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*)

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*)

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 on a CD-ROM, and it is deleted after six months.

- 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*)

Electronic records will be deleted.

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*)

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.

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

A return preparer, or any public member of the Facebook site, could deliberately or inadvertently disclose taxpayer information.

a. What are the IRS plans to mitigate those 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.

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

Facebook uses session cookies to allow advertisers to track Internet activity of users and provide relevant ads within the Facebook page.

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

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."

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

If yes, describe, state authority & provide reason

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)

The purpose of the Return Preparer Office Facebook page is to provide an opportunity to directly communicate with and engage the more than 350,000 registered 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.

12. Requested operational date

Ongoing -- PIA 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

[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