

# US Department of Health and Human Services

## Third Party Websites and Applications Privacy Impact Assessment

**Date Signed:**

October 02, 2020

**OPDIV:**

NIH

**Name:**

NIAMS Twitter Funding

**TPWA Unique Identifier:**

T-2678879-993917

**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.**

null

**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: N/A

**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:**

Twitter is a micro-blog used to send short messages (up to 140 characters) or "Tweets" to share information about the National Institute of Arthritis and Musculoskeletal and Skin Diseases (NIAMS) Funding opportunities and related information that potential applicants (or grantees) might find useful. NIAMS will respond to comments and inquiries sent via Twitter. NIAMS also has moderation guidelines for its existing Twitter accounts and other social media. Visitors who want to subscribe to (or follow) NIAMS Funding Twitter feed must create a Twitter account at <http://www.twitter.com>. Users do not need an account to view what NIAMS posts on its Twitter feed, but an account is necessary to interact (follow, direct message, retweet, etc.) To create an account, the user must provide personal information, such as name, user name, password and e-mail address. Twitter users have the option to provide additional personal information including a short biography, location or a picture. Twitter users are responsible for establishing their privacy settings.

NIAMS staff members monitor the number of subscribers and respond to comments and queries via Twitter, but do not collect, maintain, disclose or share any information about people who follow NIAMS on Twitter.

The Twitter privacy policy is available at: <http://twitter.com/privacy>

**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:**

Visitors can visit the NIAMS website (<http://www.niams.nih.gov>) Grants & Funding section to view funding opportunities, guidelines, policies, etc. NIAMS Funding account tweets will often direct users back to the information already on the NIAMS website or the NIH Guide to Grants and Contracts. Users can contact NIAMS staff with questions or send an e-mail to the Twitter administrator.

**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?**

An external hyperlink from an HHS Website or Website operated on behalf of HHS

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

Links are available from several locations on the NIAMS website. The Twitter feed will also be embedded on the NIAMS Grants & Funding landing page. Followers of the existing NIAMS Twitter account will be notified of this feed which will contain funding-related information only, while the existing Twitter feed (@NIH\_NIAMS) contains additional information on research news and health topics. NIAMS will encourage potential applicants to follow the new feed.

**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 anongovernmental Website?**

Yes

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

No

**Provide a hyperlink to the OPDIV Privacy Policy:**

<https://www.niams.nih.gov/privacy-statement>

**Is an OPDIV Privacy Notice posted on the third-part 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?**

Yes

**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:**

Upon creation of a Twitter account, the user must provide a name, user name, password and e-mail address. In addition, users may provide a short biography, location or picture. This information will be visible to NIAMS and other Twitter users. If users interact with NIAMS via direct messaging, they may provide personally identifiable information (PII) in their messages; NIAMS may provide that information to direct contractors only for the purposes of conducting NIAMS business (fulfilling requests or preparing responses).

**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:**

NIAMS staff never take possession of the personal information belonging to Twitter followers (except in the rare instances of direct messaging). NIAMS will not collect, maintain, disclose or share any information about people who follow the feed on Twitter. Information on followers of this account will be made available to other Twitter users via Twitter itself. As part of NIAMS archiving procedures, comments made to the NIAMS Twitter site will be stored on a shared drive, along with the user name of the Twitter user and will be retained as long as the mission dictates. Direct contractors who prepare responses and fulfill requests will keep the data as long as needed to fulfill the requests; PII is then purged per Twitters removal schedule.

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

Access controls are in place to limit the shared drive to those with a valid business need to view the

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

Yes

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

Access to the shared drive where such data is stored is secure from unauthorized access.

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

Protection of PII is totally dependent upon the privacy settings established by the account holder. Twitter is a system designed by a third party to be an interactive forum in which people share information, potentially, personally identifiable information. Twitter.com is a privacy risk for those who choose to use it and NIAMS does not have control over its operation. Users do not need an account to view what NIAMS posts on its Twitter feed, but an account is necessary to interact (follow, direct message, retweet, etc.)