US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

August 08, 2017

OPDIV:

SAMHSA

Name:

Twitter SAMHSA account

TPWA Unique Identifier:

T-2919840-424784

Is this a new TPWA?

No

Please provide the reason for revision.
Annual review

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: 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 SAMHSA's Twitter use is to promote SAMHSA information, programs, policies, and strategic initiatives to the public. To provide a forum for two-way engagement between SAMHSA and the public in accordance with the Open Government Directive. To open or administer the SAMHSA Twitter, a SAMHSA Office of Communications employee/Direct Contractor enters the third party website SAMHSA username and password. This username and password information is saved on SAMHSA's internal/secure network and the only persons at SAMHSA who access and maintain SAMHSA'S Twitter are the staff of SAMHSA's Office of Communications/Direct Contractor. No SAMHSA employee/Direct Contractor PII is submitted to gain access.

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:
All content shared on Twitter is repurposed from another source or is specific to Twitter users alone. No information is uniquely created for Twitter use alone. Content is repurposed in a way that is optimized for Twitter and follows best practices. Most Twitter updates link to other resources for additional information (such as websites, publications, etc.).

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 OPIDIV?
Incorporated or embedded on HHS Website

Please describe how the public navigate to the thirdparty website or application:
Users can link to SAMHSA's Twitter page via an external hyperlink on the SAMHSA.gov website. Users can also search third party application/website directly or any other web-based search tool for SAMHSA's Twitter page.

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?
Yes

Provide a hyperlink to the OPDIV Privacy Policy:
https://www.samhsa.gov/privacy

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?
Yes

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:
SAMHSA records the individual's name and a specific comment that violates SAMHSA's commenting policy (https://www.samhsa.gov/privacy.aspx). We record this information because all comments that violate the commenting policy are deleted from the page and is intended to stop serial abusers by blocking aliases.

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 only information that will be collected is a person's Twitter username and the comment they posted that violated the commenting policy to stop serial abusers by blocking aliases.

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?
   Yes

Describe how PII that is used or maintained will be secured:
   SAMHSA's Twitter account is secured by a username and password that is held by two administrators in SAMSHA Office of Communications. No one is given credentials.

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