

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

August 08, 2017

OPDIV:

SAMHSA

Name:

SAMHSA Flickr TPWA

TPWA Unique Identifier:

T-8345321-566978

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:

SAMHSA's Flickr photostream contains SAMHSA photos, photos from public and private entities with permission, photo captions/descriptions, and meta-data (keywords/tags) all cleared and approved for public distribution. Flickr is property of Yahoo. SAMHSA is using Flickr to share cleared/approved photos with the public, media, academia, and other government agencies. The purpose is to enhance the public's understanding of SAMHSA activities and deliver critical and timely information to the public about SAMHSA programs and activities. To open or administer the SAMHSA Flickr, a SAMHSA Office of Communications employee 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 Flickr are the staff of SAMHSA's Office of Communications. 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:

Selected photo albums are featured on the SAMHSA.gov social media page and other program, campaign, or event specific SAMHSA.gov Webpages.

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 third party website or application:

Users can link to SAMHSA's Flickr page via an external hyperlink on the SAMHSA.gov website or via another third-party social media website like Twitter or Facebook. Users can also search within the third-party website directly for the SAMHSA Flickr 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 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:

<http://samhsa.gov/privacy.aspx>

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 does not require or solicit PII for public interaction with SAMHSA's Flickr page. All comments submitted to SAMHSA's Flickr page go through the comment clearance process to ensure PII isn't shared via the comment option. All comments are only posted to Flickr once approved by SAMSHA Office of Communications staff. Since the SAMHSA Flickr page is pre-moderated, PII is not shared on the channel and only collected in the event of a comment policy violation. The only information that will be collected is a person's name and the comment they posted that violated the commenting policy.

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 name and the comment they posted that violated the commenting policy.

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 Flickr account is secured by a username and password that is held by two administrators in SAMSHA Office of Communications.

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

N/A