

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

June 16, 2020

OPDIV:

OS

Name:

Dental Professional Advisory Committee Instagram

TPWA Unique Identifier:

T-8000070-598131

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.

N/A

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: Office of Management and Budget (OMB) clearance is not required because Office of the Secretary is not collecting information from individuals or entities.

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 Instagram account is intended as a recruitment tool to potential new candidates to the Dental Category of the United States Public Health Service (USPHS). The account also serves as an additional avenue for dissemination of information regarding Dental Category of USPHS to existing Dental USPHS officers.

The Instagram account used to disseminate information regarding USPHS activities, events, and announcements to existing officers. It is also used to as a tool connect officers that may be in remote areas to other officers within the category.

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:

The public can obtain information from the Dental Category website at <https://dcp.psc.gov/osg/dentist/>.

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:

The USPHS Dental Professional Advisory Committee (DePAC) Instagram account can be accessed from the DePAC website via <https://dcp.psc.gov/osg/dentist/scwg-socialmedia.aspx> or directly through a web search engine inquiry or through individual Instagram accounts. The Instagram account can be found at <http://instagram.com/usphsdental>.

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://www.hhs.gov/privacy.html>

Is an OPDIV Privacy Notice posted on the third-party 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?

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:

The USPHS Dental Category does not collect any personally identifiable information (PII) through its use of Instagram. Minimal information needs to be submitted to Instagram upon account set-up - only name and username is required. This info is visible to the public. The e-mail address associated with the Instagram account is private. The public may also view posts on an Instagram account without an individual account. No comments however can be made without an individual account. USPHS Dental Category does not solicit, collect, or maintain any PII from individuals who visit, like, comment, or otherwise engage with the page. USPHS Dental Category Social Media Workgroup Administrators may however, read, review, or rely upon information that individuals make available on the Instagram page in the form of comments for the purposes of responding to a user's question.

USPHS Dental Category Administrators may delete any comments on the Instagram page at the discretion of the administrators.

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:

Personally identifiable information (PII) is not collected or shared from the third-party website.

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

PII is not shared.

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:

PII is not used or maintained.

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

Due to limitations on Instagram, the Privacy Policy is not posted in full text on the Instagram page. It is viewable from the page by clicking on a hyperlink the Facebook page link, where the policy is available.

RISK: Instagram is a third-party service that uses persistent tracking technologies. In an effort to help consumers understand how their information is used by Instagram, our page contains a link to the Dental Professional Advisory Committee Facebook Page which has the policy in full text. Per terms of service agreements by HHS and Instagram, the Dental Professional Advisory Committee Instagram page does not contain any third-party advertising. This limits any association with additional content that the Advisory Committee has not reviewed nor endorsed on the page. In addition, the Privacy Notice Statement directs users to review Instagram's terms of service and privacy policies to understand how information about users, including pages a user may visit, and how Instagram may use or share such information for third-party advertising or other purposes. Instagram is maintained by Facebook. The Dental Professional Advisory Committee Social Media Workgroup has reviewed Instagram's and Facebook's privacy practices and has concluded that risks to consumer privacy are sufficiently mitigated through application of third party's privacy policies, notices from HHS and Instagram informing consumers of these policies, and the ability of consumers to opt-out of providing their information to the Dental Professional Advisory Committee, Instagram, and Facebook.

The Social Media Workgroup will conduct a periodic review of Instagram's privacy practices to ensure Instagram's policies continue to align with agency objectives and privacy policies and do not present unreasonable or unknown risks to consumer privacy.