



Privacy Program U.S. Access Board

Privacy Impact Assessment: Third-Party Social Media/Social Networking Websites and Applications

Section 1: System Information

1.1 Name of Website/Application: Twitter

1.2 Agency Account - Public URL/Name: <https://twitter.com/@AccessBoard>

1.3 Agency Account Administrator: David Yanchulis

1.4 Form Completed By: Aromie Noe & Dave Yanchulis

1.5 Submission Date:

1.6 Reason for PIA Completion:

New third-party website/application

Changes to use of account by agency that affects data collection/privacy practices

Other (please specify): Existing third-party website account

Section 2: Overview and Purpose

2.1 Describe the website/application:

The Access Board (hereafter as “Board”) uses Twitter, a microblogging website (i.e., a blog consisting of short posts or messages limited to 280 characters) to disseminate accessibility-related information and resources to the public. Typical tweets posted by the Board may include, but are not limited to, texts, photos, news articles, and short videos. The Board's Twitter profile is public, so anyone, including visitors who are not registered Twitter users, can visit the account and read the agency's tweets.

2.2 Describe how use of the website/application will serve Access Board mission or program (with references to relevant sections of the ABA or Rehabilitation Act, if any)

Through the Twitter account, the Board aims to promote accessibility-related information and resources to individuals with disabilities and other stakeholders who may not visit the Board's website regularly, which will help the Board fulfilling its statutory mission to promote accessibility throughout all segments of society. See 29 U.S.C. §792.

Section 3: General Requirements

3.1 Third-party privacy policies

- a. The Account Administrator has examined the website/application’s privacy policies, evaluated the risks, and determined that the site is appropriate for agency use.

Yes No

- b. The Account Administrator will periodically monitor the website/application’s privacy policies and reassess privacy risks, if needed.

Yes No

- c. The Account Administrator will ensure that, if a link to the third-party website/application is posted on the agency’s website that leads to a web location that is not part of an official government domain, the agency’s website will provide an alert to visitors (e.g., statement adjacent to link, “pop-up” notice) that they are being re-directed to a non-governmental, third-party website/application.

Yes No

3.2 Embedded applications

- a. The Account Administrator will ensure that, if the third-party website/application is embedded or incorporated on the agency’s website, visitors will be informed of the third-party’s privacy policies.

Yes No

3.3 Agency branding

- a. The Account Administrator will follow federal guidance suggesting that, when an agency uses a third-party website/application that is not part of a government domain, the agency will apply appropriate branding (e.g., placing agency logo on profile page on a social media site) to distinguish the agency’s activities from those of the non-governmental entity.

Yes No

3.4 Information collection

- a. If information is collected through the Access Board’s use of the website/application, the Account Administrator will ensure that only information necessary for the proper performance of agency functions and which has practical utility will be collected.

Yes No

3.5 Privacy policy notice

- a. The Account Administrator agrees to ensure that a privacy notice/disclosure statement, as approved by the Access Board Privacy Office, is posted on the website/application.

Yes No

Section 4: Information Collection

4.1 When using the website/application, does the Access Board plan to collect personally identifiable information (PII) from individuals? (If yes, please explain.)

Yes No

The Board does not collect any PII. The Board's tweets are viewable by anyone, including those who are not registered at Twitter and searchable on Twitter's website (or other third-party sites linked to Twitter). Twitter requires users to provide their first name, last name, a valid email address, and a password, with the option to provide additional information, when they register an account. Even though some of this information is accessible to the Board, depending on a Twitter user's privacy settings, the Board collects no PII provided to Twitter.

4.2 Will individuals be required to provide their name and/or email address to access or use the Access Board's page/account/channel on the website/application?

Yes No

4.3 By having an account on the website/application, will individuals' PII potentially be made available to the Access Board, regardless of whether the agency actively solicits or collects such information? (If yes, please explain.)

Yes No

Twitter requires users to provide their first name, last name, a valid email address, and a password, with the option to provide additional information in their biography when they register an account. The information that the Twitter-registered users post to their public profiles may be accessible to the Board. This includes name (real or pseudonym), Twitter handle, location, and any additional information they post publicly in their biography. However, the Board does not have access to all the information that Twitter collects to register for the site. The Board does not collect, disseminate, or maintain any of the information provided to Twitter.

4.4 Will individuals be permitted to post content on the website/application (e.g., post comments, ask questions, express views on regulatory initiatives)? (If yes, please explain.)

Yes No

No comments are allowed; only the "like" rating can be posted at the Board's Twitter account.

If a registered user posts a tweet that includes the Access Board's account handle, the tweet will appear in the user's profile and home stream, as well as the timelines of all followers of that user. Additionally, that tweet will show up in the Board's account. The Access Board cannot delete tweets sent by other users, if they mention the Board's account; but the Board can block Twitter users or other messages that are deemed as harassing toward the Board.

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- *If you answered yes to any question in Section 4 above, a full PIA for the website/application is required. You must complete the remainder of this form.*
 - *If you answered no to all questions in Section 4 above, you do not need to complete a full PIA. Proceed to Section for review and approval.*
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Section 5: Openness and Transparency

5.1 Will the Access Board provide notice to individuals about how the agency will collect, use, or share their PII? (If yes, please explain.)

Yes No

Not applicable. The Board does not collect, use, or share any individuals' PII. The home page of the Board's account includes a statement that Twitter's privacy policies govern there. Information on where to find the Board's privacy policies is also provided to the public.

5.2 Will the Access Board use or access individuals' PII from the website/application? (If yes, please explain.)

Yes No

The Board does not use or access any of the information provided to Twitter. The Board does not have access to all the information that Twitter collects to register for the site. The information that Twitter-registered users post to their public profiles is available to the Board. This includes a user's name (real or pseudonym), Twitter handle, location, and any information they post publicly in their biography.

5.3 Will the Access Board share individuals' PII from the website/application with other governmental agencies, private organizations, or persons (aside from Account Administrators)? (If yes, please explain.)

Yes No

The Access Board has no plan to share individual users' PII with other agencies, organizations, or persons.

Section 6: Information Retention and Security

6.1 If the Access Board plans to access, collect or store individuals' PII, describe the steps the agency will take to protect this information.

Not applicable. The Board does not access, collect, or store PII that Twitter collects from its registered users.

6.2 If the Access Board plans to access, collect, or store individuals' PII, how long with this information be retained? (Please consult with an Access Board records official about applicable record retention schedules.)

Not applicable. The Board does not access, collect, or store PII that Twitter collects from its registered users.

6.3 If the Access Board plans to access, collect, or store individuals' PII, describe the identified privacy risks and how such risks will be mitigated.

The Access Board has no plan to access, collect, or store individuals' PII. As explained earlier, the Board's Twitter account makes it clear that Twitter's privacy policies govern there and provides the link to the Access Board's privacy program.

Section 7: Legal Compliance

7.1 Will the Access Board's use of the website/application trigger the Paperwork Reduction Act

(PRA)? (Please consult with USAB/OGC concerning PRA requirements.)

Yes No

7.2 Will the Access Board’s use of the website/application trigger the Privacy Act of 1974 (e.g., creating or modifying a “system of records”)? (Please consult with the Privacy Office concerning PRA requirements.)

Yes No

Section 8: Privacy Office Review

Please submit completed forms to the Access Board Privacy Office (privacy@access-board.gov). An Access Board Privacy Officer will review the form and notify you whether the requested use of the third-party website/application has been approved.

For Access Board Privacy Office Use Only

Reviewed By (Privacy Officer): Gretchen Jacobs

Date: 5/25/2019

Requested use of third-party website/application is:

Approved (Use consistent with agency privacy policies and/or applicable federal authorities)

Approved, with conditions (specified below)

Denied (Use inconsistent with agency privacy policies and/or applicable federal authorities)

Signature (Privacy Officer): //e-signed// Gretchen Jacobs

Comments/Notes: