



Department of the Treasury

Privacy and Civil Liberties Impact Assessment
for the

Department-wide Use of Third-Party Social
Media Websites for Public Engagement

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Reviewing Official

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Section 1: Introduction

The Department of the Treasury (“Department” or “Treasury”) uses third-party social media websites (“social media websites”) to engage in dialog with members of the public to promote transparency, improve public access to government information, and encourage public participation and collaboration. In accordance with the President’s Memorandum on Transparency and Open Government¹ and the Director of the Office of Management and Budget’s (OMB) Open Government Directive Memorandum², Treasury upholds the three principles of transparency, participation, and collaboration to foster a culture of open government throughout the Department. Social media for public engagement includes the Department’s uses of the following types of social media websites:

- 1) Third-party-owned social networking websites and applications that facilitate one-way and two-way interaction³ between official Treasury social media accounts and the public. Members of the public typically do not need accounts to view information made available on most Treasury official social media websites. However, Treasury users and public users must have accounts to use all the features associated with applications tailored to these specific websites. This type of social media includes, but is not limited to, Facebook, LinkedIn, and Twitter;
- 2) Third-party-owned applications and websites that disseminate video and image content. These social media websites include but are not limited to: YouTube and Flickr. For these social media websites, official Treasury users must have an account to post information to make it available to the public. Public users of these accounts typically do not need an account to see video or image on these social media websites. For public users to comment on Treasury webpages on these sites (when Treasury has not disabled the comment function), the public user may need an account; and,
- 3) Treasury-owned websites that aggregate user posts from various social media websites when public users choose to engage with the Department through Treasury-generated hashtags.

The Department is updating a previous Privacy and Civil Liberties Impact Assessment (PCLIA) for the Department-wide Use of Third-Party Social Media Websites for Public Engagement that was approved on February 3, 2016. This PCLIA sets forth the Department’s practices with respect to the use of social media websites for public engagement purposes. The PCLIA also analyzes the privacy risks associated with those practices; and describes the mitigation strategies the Department implements to protect personally identifiable information (PII) collected, maintained, and used when the Department engages with the public via social media.

This PCLIA specifically provides the following information regarding Treasury’s use of social media websites: (1) the specific purpose of the use; (2) any PII that is likely to become available through this interaction; (3) any intended or expected use of PII collected; (4) sharing or disclosure

¹ Transparency and Open Government Memorandum for the Heads of Executive Departments and Agencies https://www.whitehouse.gov/the_press_office/TransparencyandOpenGovernment

² OMB Memorandum M-10-06, Open Government Directive https://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-06.pdf

³ While all of social media websites facilitate two-way interactions with the public; there are some sites that Treasury has decided only to conduct unilateral interactions with the public, by disabling features such as the comment feature. These interactions are also covered by this PCLIA, as Treasury or the third-party website may change the settings of those sites at any time.

of the PII; (5) maintenance and retention of the PII; (6) security of the PII; (7) identification and mitigation of privacy risks; and (8) compliance with privacy requirements and other legal and policy requirements that support privacy.

In accordance with OMB Memorandum (M) 03-22, *OMB Guidance for Implementing the Provisions of the E-government Act of 2002* and M-10-23, *Guidance for Agency Use of Third-Party Websites*⁴, Treasury is required to conduct a PCLIA because the use of social media websites makes PII available to the Department.

Section 2: Definitions

Make PII Available. The term “make PII available” includes any agency action that causes PII to become available or accessible to the agency, whether or not the agency solicits or collects it. In general, an individual can make PII available to an agency when he or she provides, submits, communicates, links, posts, or associates PII while using the website or application. “Associate” can include activities commonly referred to as “friending,” “following,” “liking,” joining a “group,” becoming a “fan,” and comparable functions.

Personally Identifiable Information (PII). The term “PII” as defined in OMB Memorandum M-17-12 refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many different types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available – in any medium and from any source – that, when combined with other available information, could be used to identify an individual.

Privacy and Civil Liberties Impact Assessment (PCLIA). A PCLIA is:

- (1) a *process* conducted to:
 - a. identify privacy and civil liberties risks in systems, programs and other activities that maintain PII;
 - b. ensure that information systems, programs and other activities comply with legislative, regulatory, and policy requirements;
 - c. analyze the privacy and civil liberties risks identified;
 - d. identify remedies, protections and alternative or additional privacy controls necessary to mitigate those risks; and
 - e. provide notice to the public of privacy and civil liberties protection practices.
- (2) a *document* that catalogues the outcome of that privacy and civil liberties risk assessment process.

Privacy Policy. The term “privacy policy” is described in OMB M-99-18, *Privacy Policies on Federal Web Sites*,⁵ and is further explained in OMB Memorandum M-03-22. This term refers to a single, centrally located statement that is accessible from an agency’s official homepage. The privacy policy should be a consolidated explanation of the agency’s general privacy-related practices that pertain to its official website and its other online activities.

Social media websites. For purposes of this directive, this term refers to non-governmental; third-

⁴ OMB Memorandum M-10-23, *Guidance for Agency Use of Third Party Websites and Applications* (June 25, 2010), available at http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-23.pdf.

⁵ Available at: https://www.whitehouse.gov/omb/memoranda_m99-18/

party owned and operated websites, applications, and web-based tools (some that may be embedded on the social media website by the third-party owner of the site) that allow the creation, exchange and tracking of user-generated content. Through social media, people or groups can engage in dialogue, interact, and create, organize, edit, comment on, combine, and share content. Treasury currently maintains an official presence on the following social media websites: Facebook, Flickr, Github, Google+, LinkedIn, Pinterest, Twitter, and YouTube (each described in more detail in Section 3.1 below).

Section 3: Overview

3.1: Scope

This PCLIA covers Treasury's use of the following social media websites: Facebook, Flickr, GitHub, Google+, LinkedIn, Pinterest, Twitter, and YouTube. In addition to these Treasury-wide uses of social media, the following Treasury Departmental Offices currently use social media websites: the Office of Financial Research (OFR) and the Troubled Asset Relief Program (TARP). Other Treasury bureaus that use social media are the Bureau of Engraving & Printing; Bureau of the Fiscal Service; Office of The Comptroller of The Currency (OCC); Internal Revenue Service (IRS); Treasury Inspector General for Tax Administration (TIGTA); the Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP); and the United States Mint. This PCLIA does not cover the use of social media websites by the Internal Revenue Service (IRS). IRS social media use is covered by specific IRS Privacy Impact Assessments and PCLIA's for each social media website and can be found on the [IRS website](#).⁶ This PCLIA also does not cover the use of social media websites by the Office of the Comptroller of the Currency (OCC). OCC social media use is covered by a specific OCC PCLIA and can be found on the [OCC website](#).

This PCLIA also does not cover information that individuals provide to Treasury via telephone, email,⁷ text message, instant message, or other methods of communication that do not involve social media for public engagement purposes. Therefore, Treasury's collection, use, and disclosure of any PII as a result of those communications will be addressed separately in the PCLIA for the relevant Treasury system, in which the information is stored.

Social Media Websites

Treasury maintains social media accounts to engage in dialog that increases government transparency, promotes public participation, and encourages collaboration within the Department. Treasury maintains an official presence on many social media websites. Each of these social media websites has different account registration requirements (collecting varying degrees of PII) and different functions and options that account holders may use or enable to interact with other users on the website. Treasury has official accounts on the following social media websites. To verify whether the social media site you visit is an official Treasury or government site, please see the Federal Government Social Media Registry available here: <https://www.usa.gov/verify-social-media>.

Facebook: Treasury maintains pages on Facebook, a social networking site that allows users to create personal profiles to connect with friends, co-workers, and others who share similar interests or who have common backgrounds. Members of the public who register for these accounts may also choose to create profiles in which they make the following information available to people in their network, or to the general public: detailed personal

⁶ Available at: <http://www.irs.gov/uac/Privacy-Impact-Assessments-PIA>

⁷ Contact information records of individuals who choose to correspond with Treasury or join Treasury email list services is covered by Treasury System of Records Notice .017, Correspondence and Contact Information. <https://www.federalregister.gov/documents/2016/11/07/2016-26662/privacy-act-of-1974-systems-of-records>

information, including birthday, home address, telephone number, employment history, educational background, friends and acquaintances, and religious and other beliefs and opinions. Facebook also allows any user to establish a “page” to represent an organization, business, or public figure to disseminate information to users who choose to connect with them. These users can leave comments in response to information posted on a page. Profile information for these users may be made available to the administrators of these pages, depending on settings controlled by the user. According to Facebook, the site has over 2.963 billion monthly active users, as of January 2023.

Instagram: Treasury maintains pages on Instagram, a social networking service owned by Facebook that allows users to share photos and videos, tell visual stories, and promote products and services. Instagram offers both personal and business accounts. It is primarily a graphic platform rather than a text-focused one like Facebook. Members of the public who register for an Instagram account may post content, follow other account holders, and accumulate followers of their own. Account holders display a profile image, screen name, and other personal descriptive information they choose to provide about themselves, some, or none of which might contain personally identifying information. Accounts may be set to public or private. Users may comment on postings of other public account holders and may “like” others’ postings or comments. Account holders are able to see the screen name and profile image of their followers. The Instagram platform tracks and shows the number of views that posts receive. It also allows account holders to post polls, and to post stories that are visible to other site users only for a 24-hour period. According to Instagram, as of January 2023, Instagram has over 2.35 billion accounts worldwide active every month, and over 1.386 accounts active every day.”

Flickr: Treasury maintains pages on Flickr, an image and video hosting website that allows users to share photographs within an online community. Treasury’s Flickr pages are publicly available and do not require users to have a Flickr account to view Treasury photographs. Users who choose to create Flickr accounts, must provide PII to Flickr such as full name, mobile phone number, birthday, and gender. Users must also have a Yahoo account to access their Flickr accounts. Users can then upload photos and videos from the web, mobile devices, home computers, etc. With permission from the individual Flickr account holder, other users can add comments, notes, and tags to the account holder’s collection of photos and videos. According to one estimate, as of January 2023, Flickr had over 112 million registered members and more than 3.5 million new images uploaded daily.

GitHub: Treasury maintains pages on GitHub, a managed collaboration tool that makes software development, code collaboration, code review and code management possible for open source and private projects. GitHub offers plans for private repositories and free accounts, which are usually used to host open-source projects. Users can create an account by providing an email address to GitHub. Users can opt to add additional PII to their personal profile, including full name, location, and website. Users also have the option of leaving their profile blank. Users can review agency code and agencies can interact and access public source codes. Users can also use GitHub to manage technical IT projects and technical research code. According to GitHub, the site has 10 million users including 600 thousand organizations, and hosts 26 million repositories.

Google+: Treasury maintains pages on Google+, a social networking site that allows users to create personal profiles describing themselves and connect with friends, co- workers,

and others who share similar interests or who have common backgrounds. Users can gain access to this service by receiving an invitation from a current Google+ user but must first have a Google account. These accounts require PII such as full name, birthday, gender, mobile phone number, alternate email address and location. Users can interact with other users through a variety of components such as “circles,” “huddles,” “hangouts,” and “sparks.” “Circles” allows users to set up smaller personalized social groups. “Huddle” is a tool for group chat for phones that is private to outside viewers. “Hangouts” is video chat and instant messaging. “Sparks” finds web items based on a user’s interests and shares those items in the user’s main account page. Photos can also be uploaded for sharing. According to Google’s official blog, there were 2 billion Google+ users as of January 2023.

LinkedIn: Treasury maintains pages on LinkedIn, a professional networking site that allows users to create online resumes, connect with professional colleagues and classmates, and share relevant content. Users can create an account by providing their full name and email address to LinkedIn. Once an account is established, users can provide additional PII on their LinkedIn page at their discretion. Users can request to “connect” to other LinkedIn users to view their whole profile. Users can also view a sample of other user’s profiles without creating an account. Users can send personal messages, post research, or endorse another user for a certain skill. According to LinkedIn, it is the world’s largest professional network with 900 million members worldwide.

Pinterest: Treasury maintains pages on Pinterest, a social networking site that allows users to visually share and discover new interests by posting (known as 'pinning') images or videos to their own or others' boards (i.e., a collection of 'pins,' usually with a common theme) and browsing what other users have pinned. Treasury’s Pinterest accounts are publicly available, and users are not required to have Pinterest accounts to see Treasury pins. Users can establish accounts through existing Facebook, Google, or Twitter accounts, or may provide information to create an account directly through Pinterest. As of March 2023, Pinterest has over 450 million monthly active users.

Twitter: Treasury maintains accounts on Twitter, a social networking site that allows users to share and receive information through short messages (no longer than 280 characters in length) that are known as “tweets.” Treasury’s Twitter accounts are publicly available. Users are not required to have Twitter accounts to see Treasury tweets. Twitter users can establish accounts by providing a limited amount of PII but may elect to provide additional PII if they wish. Users can post messages to their profile pages and reply to other Twitter users’ tweets. Users can “follow” other users as well— i.e., subscribe to their tweets. According to Twitter, it has 450 million monthly active users, sending 500 million tweets per day.

YouTube: Treasury maintains pages on YouTube, a video-sharing site that allows users to discover, watch, upload, comment on, and share videos. Treasury’s YouTube postings are publicly available. Users do not need to set up an account to watch Treasury YouTube videos. Similar to Twitter, users can establish accounts on YouTube with only limited amounts of PII, but they may choose to provide more detailed information on their profile page. Users can comment on videos posted on a page either in written responses or by uploading their own videos. According to YouTube, the site has more than 2.56 billion monthly active YouTube users, and an average of 2,500 new videos are uploaded every minute, amounting to 183 hours of video content, with an average video length of 4.4

minutes.

3.1 Authority to Collect

Executive Order (E.O.) 13571, *Streamlining Service Delivery and Improving Customer Service*,⁸ sets forth requirements for government agencies using technology to improve customer service to members of the public. Section 2 of the E.O. directs agencies to: (a) establish one major initiative that will use technology to improve the customer experience; and (b) establish mechanisms to solicit customer feedback on government services and use such feedback regularly to make service improvements. This E.O. grants Treasury the authority to use technology to engage with the public through the use of social media.

In addition, the following memoranda provide guidance for Treasury to use social media websites to engage with members of the public.

- 1) The President's *Memorandum on Transparency and Open Government*, January 21, 2009;
- 2) OMB Memorandum M-10-06 *Open Government Directive*, December 8, 2009;
- 3) OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites*, June 25, 2010; and
- 4) OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, April 7, 2010.

Section 4: Information Collection

4.1 Information Made Available vs. Information Collected

Information Likely to Become Available to Treasury Through Public Use of Treasury Social Media Pages

For purposes of this PCLIA, Treasury distinguishes information the public makes available via social media using Treasury hashtags or posting on Treasury social media websites from information Treasury collects or uses for official purposes. In the context of Treasury's social media use, the word "collection" refers to Treasury gathering or copying comments or other information members of the public post on a third-party website and storing and maintaining that information on a Treasury information system or in a paper file.

Treasury limits the PII that it collects via social media to that which is relevant and necessary to the Treasury mission. Treasury does not actively encourage the public to submit PII on social media (and, in fact, discourages members of the public from posting it publicly), and may only use the minimum amount of PII that the Department receives to accomplish a purpose required by statute, regulation, or executive order.⁹ Treasury employees who manage the Department's official social media websites do not proactively "friend" or "follow" a member of the public who uses the particular social media website (Treasury employees only "friend" other U.S. federal, state, local, and tribal government agencies) but may accept invitations to be "friended" and/or "followed" by public users.

Social media websites allow members of the public to register for an account and share personal

⁸ For more information, please visit: <https://www.whitehouse.gov/the-press-office/2011/04/27/executive-order-13571-streamlining-service-delivery-and-improving-custom>

⁹ OMB Memorandum M-10-23, *Guidance for Agency Use of Social media websites* (June 25, 2010), available at http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-23.pdf.

information within their personal and professional networks, with private companies, government agencies, and the general public. This information can include, but is not limited to: interests, birthdays, religious and political views, family members and relationship status, education and work, photos, alias, contact information (e.g., phone, email, and address).¹⁰ Treasury does not collect or have access to any information provided on these social media websites that is only made available by the user to the third-party that owns the social media website (i.e., certain registration information that the user does not otherwise make public on their account) or when users limit public access to information using the social media website's privacy settings (e.g., where users can choose who is allowed access to certain information they post on their personal page on the site).

Social media users may also choose to engage with Treasury by commenting on posts, "following," "retweeting," "liking," using a Treasury generated hashtag, and "friending" a Treasury social media website. Through these interactions, a user can make PII available to Treasury on the social media website if they provide, submit, communicate, link, post, or associate PII while using the website.

The amount of PII about public users made available to Treasury is limited but depends on the individual user's privacy settings. For example, if an individual chooses to comment on a post on Treasury's official social media webpage, that individual's comment along with his or her username and photo likely will be displayed on the Treasury social media website, unless he or she has established privacy settings that block the publication of this information. Each social media website provides its own privacy policy, and while users are typically required to submit some PII during the registration process, Treasury does not solicit, collect, or even have access to this PII unless that same information is repeated by the user (outside the registration process) to the public elsewhere on the user's personal page.

Treasury also generally chooses to limit information the public posts on the social media website by disabling certain features that allow individuals to post comments (which may contain PII) on official Treasury pages on those sites.

Information Treasury Collects

Treasury collects only the minimum information necessary to carry out its mission. In most instances, Treasury does not collect the PII made available to it through social media. However, there are some limited circumstances when Treasury will collect publicly available PII from social media websites. Treasury also generally does not collect information from users who post or comment on, "like", "follow," and/or "friend" Treasury third party social media pages. This includes information from users who engage with Treasury through Facebook, Flickr, Google+, LinkedIn, Pinterest, Twitter, and YouTube.

On most social media websites on which Treasury maintains a webpage, account holders have the option to block public comment. This is important because when a member of the public can comment, they can inadvertently (or intentionally) include PII in their comments. Treasury generally opts to disallow comments when there is such an option, unless necessary to the purpose for the particular social media use. Therefore, on many Treasury third-party social media pages, there is no PII or other information available for Treasury to collect. On these sites, Treasury only engages in "one-directional" sharing with the public (i.e., Treasury sharing with the public).

By contrast, some Treasury social media uses are designed to encourage public comment and engagement on particular issues on the public-facing website (e.g., GitHub). In these instances,

¹⁰ See Section 3.1 of this PCLIA for a more detailed discussion of the types of PII that might be made available on social media websites.

public comments are encouraged to generate discussion among visitors to the site. Merely allowing the public to comment on the third-party website is not, however, a collection of information unless Treasury takes the extra step of extracting, copying, or otherwise using that information from the third-party website for a mission-specific purpose (e.g., by Treasury responding publicly to the commenter on its social media webpage or through some other method of communication). Out of those limited situations where Treasury does allow the public posting of comments on its third-party social media webpages, there is an even smaller percentage of situations where Treasury collects and stores PII from these comments on Treasury systems (or paper files) or otherwise uses that information from the third-party website for a mission-specific purpose. When Treasury does collect this information, it only collects the minimum information necessary to carry out the Department's mission or records management functions required by law.

4.2 Relevant and Necessary

The Privacy Act of 1974 requires that every federal agency, “maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required by statute or by Executive order of the President.”¹¹ The Privacy Act allows federal agencies to exempt certain records from this requirement if certain conditions are met. This includes issuing a Notice of Proposed Rulemaking (NPRM) to solicit public opinions on the proposed exemption and issuing a Final Rule after addressing any concerns raised by the public in response to the NPRM. It is possible for some, but not all, of the information used in a system or project to be exempted from the Privacy Act through the NPRM/Final Rule process.

Treasury determined that the information it collects and maintains from social media websites is not covered by the Privacy Act, in part because Treasury does not maintain and retrieve that information “by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.” Therefore, the Privacy Act does not apply. Treasury does not retain and store in a “system of records” (as defined in the Privacy Act) any of the comments published by users on Treasury social media webpages. This information, therefore, is not subject to the Privacy Act's relevant and necessary provision, because it is not retrieved by a personal identifier. Nevertheless, Treasury evaluated the information collected from social media websites for public engagement purposes through the review and publication of Treasury Public Engagement Pages notice, 80 FR 36407 (2015)¹² and this PCLIA. Treasury determined that the limited information the sites collect is both relevant and necessary to fulfill the requirements of E.O.13571. Treasury is collecting the minimum amount of information necessary to support its interaction with the public on social media. On some social media websites, Treasury uses options to limit interaction to one-way sharing between Treasury and the public (e.g., shutting off the function that allows the public to comment on the Treasury public webpage). For Treasury sites that do not disable the public comment function, Treasury cannot prevent a member of the public from posting PII using the website's public comment capabilities. Treasury does not, however, extract and store this information in a system of records.

¹¹ 5 U.S.C. § 552a(e)(1).

¹² For more information, please see: <https://www.federalregister.gov/articles/2015/06/24/2015-15372/treasury-public-engagement-pages>

4.3 Information Collection Risks and Mitigations

1) There is a risk that Treasury will collect more information than is necessary to carry out its social media purposes.

Treasury mitigates this risk by determining whether information is relevant and necessary to a Treasury mission before collecting any PII on social media. Treasury does not collect PII or other information posted by the public to Treasury social media websites. Treasury continuously reviews its collection of PII for social media purposes to mitigate the risk of collecting more information than is necessary to carry out its mission-related purposes.

Treasury also does not use its social media webpages to monitor individuals or groups of people. Although Treasury sometimes allows the public to provide feedback on its social media webpages by not disabling the comment function, Treasury does not control the content posted publicly by visitors to the social media site. Treasury also provides alternative email addresses or phone numbers the public can use to provide comments directly to Treasury.

2) There is a risk that the individuals will not know what privacy policy or notice applies to the collection of their information.

Treasury mitigates this risk by providing a link to the relevant Treasury privacy policy on all social media websites where PII may be posted by a member of the public. Treasury social media privacy policies provide information regarding:

- The particular social media websites Treasury uses to engage with the public.
- Whether information members of the public provide on the social media website is governed by an external third-party privacy policy.
- When and how Treasury collects information from social media websites.

Treasury also alerts visitors leaving Treasury websites for social media websites that PII collected from them via the link they just clicked is subject to the control of the website to which they are navigating and directs the visitor to review that website's privacy policy to learn more about what it does with information collected on its site. These notices alert users that Treasury cannot control what third-party websites do with information the visitor chooses to publicly post on the third-party social media webpage.

In addition to the notices above, Treasury published the Treasury Public Engagement Pages notice, 80 FR 36407 (2015) (covering "the New 10") and this PCLIA to provide additional information to the public about Treasury's collection, use, and maintenance of PII.

3) There is a risk that individuals who visit Treasury's social media webpages will not know about embedded links/applications on the social media website.

Treasury provides notice to users who visit official Treasury owned and operated websites (as opposed to Treasury pages on third-party websites) when the website embeds a link to a social media website or application on the webpage. For example, Treasury websites notifies visitors who select links to social media websites that they are leaving the Treasury website and the protections of Treasury's privacy policy. Visitors who select these links are also warned that they should review the privacy policy of the site to which they are being redirected. The applicable Treasury privacy policy is also linked at the bottom of the page most Treasury owned and operated websites. These policies further explain the effects of using links on Treasury owned and operated websites and navigating to non-government websites.

Treasury does not expressly warn visitors to Treasury pages on third-party websites about tools or applications that are embedded on the website by the owner of the third-party website

(e.g., Facebook). Members of the public should consult the social media website's privacy policy to determine whether the owner of the website embeds its own applications or applications it purchased from others (e.g., analytics programs to monitor the number of visitors to the website) (over which Treasury has no control and receives no information).

Treasury also links to the applicable Treasury privacy policy on all of its social media websites. Treasury privacy policies explain to the public that social media websites on which Treasury has an account are subject to a different privacy policy. They explain that the privacy and security policies of the social media websites apply to the public's interaction with these sites. Treasury notifies the public in its policies that it does not control, moderate, or endorse the comments or opinions provided by visitors while the information is posted on these sites.

4) There is a risk that individuals who do not have a social media account may not want to use social media or provide PII to engage with Treasury.

Treasury mitigates this risk by providing individuals access to the same information Treasury posts on its social media accounts without setting up a social media account. All of the information Treasury provides on these sites is available on the applicable Treasury website. In addition, a visitor may view any of Treasury's social media pages without registering with the social media website. For example, users can access Treasury's YouTube, Twitter, Facebook, and Flickr accounts by going to the Treasury.gov home page and clicking on the social hub. This allows a user to access the social media website without requiring a log in. In addition, members of the public can learn about Treasury's activities and communicate with Treasury without having to go to third-party social media website by visiting the [Connect with Us](#) page on the Treasury website.¹³ If Treasury uses a third-party service to solicit feedback, the Treasury page on the social media website will also provide an alternative government email address where users can send feedback. The following is a list of Treasury components with alternative sites:

- Departmental Offices [Connect with Us](#)
 - Making Home Affordable
<https://www.makinghomeaffordable.gov/pages/default.aspx>
 - Office of Financial Research (OFR) www.financialresearch.gov;
- Bureau of Engraving and Printing <http://www.moneyfactory.gov/>;
- Bureau of the Fiscal Service <https://www.fiscal.treasury.gov/>;
- Treasury Inspector General for Tax Administration
<https://www.treasury.gov/tigta/>;
- Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) only uses Twitter. All Twitter posts are sourced from information contained on www.SIGTARP.gov
- U.S. Mint <http://www.usmint.gov/>.

Unless they establish an account, however, members of the public who wish to visit Treasury's social media webpages will not be able to use all of the functions (e.g., commenting, liking, sharing) made available to registered users.

Treasury also provides a link to the appropriate privacy policy on its alternative websites. As

¹³ For more information see, <http://www.treasury.gov/connect/Pages/default.aspx>

an alternative to posting their PII publicly on a Treasury page on a social media website, an individual may also choose to email, mail, or telephone Treasury directly to provide feedback or ask questions related to the webpage. The visitor is notified that he or she will be required to provide his or her email address.

5) There is a risk that visitors to a Treasury social media site will not know whether the site is an official Treasury social media site.

Visitors to Treasury owned and operated websites will know they are interacting with an official government site by referring to “.gov” in the web address. These web pages also typically include the official Treasury seal and always include a link to the applicable Treasury privacy policy.

All official Treasury social media websites contain the Treasury/bureau seal. Treasury does this to help ensure that users are aware that they are engaging with the Department (this is sometimes called “branding” the website). Treasury also includes links to the applicable Treasury privacy policy on all Treasury social media webpages. This helps visitors to those sites understand Treasury’s relationship with the social media website; which privacy policy applies to the public’s interactions with the website; whether Treasury collects any information from the social media website; and, if information is collected, how Treasury will maintain, use, or share any PII collected for use in a Treasury program. The notice explains that the social media website is not a government website, that it is controlled or operated by a third party, and that Treasury’s Privacy Policy does not apply to the social media website (except on the rare occasion where Treasury collects information from the social media site). It also explains that by using the social media website to communicate with Treasury, individuals may be providing non-government third parties access to their PII. Links to the applicable Treasury privacy policies are provided below:

<u>Departmental Offices</u>	http://www.treasury.gov/SitePolicies/Pages/privacy.aspx
<u>Office of Financial Research</u>	http://financialresearch.gov/privacy-policy/
<u>Special Inspector General for the Troubled Asset Relief Program</u>	http://www.sig tarp.gov/pages/privacy.aspx
<u>Making Home Affordable,</u>	https://www.makinghomeaffordable.gov/pages/global-privacy-policy.aspx
<u>U.S. Treasury Inspector General for Tax Administration</u>	https://www.treasury.gov/tigta/important.shtml#1
<u>Bureau of Engraving and Printing</u>	http://moneyfactory.gov/privacystatements.html
<u>Bureau of the Fiscal Service</u>	http://www.fms.treas.gov/privacy.html
<u>U.S. Mint</u>	http://www.usmint.gov/policy/

Treasury reviews the privacy policies of each social media website prior to registering for an official page on the website. Treasury evaluates risks before using new social media websites and monitors changes to privacy policies to determine whether it needs to reevaluate the risks associated with its uses of these websites. Treasury conducts these reviews to identify and mitigate risks prior to publishing a new Treasury social media page or continuing to use social media websites.

Section 5: Maintenance, use and sharing of the information

5.1 Describe how and why the system/project uses the information it collects and maintains.

Treasury limits the information that it collects through its social media activities. Treasury uses the limited information it does collect to achieve the following goals and further specific missions of the bureaus or offices that maintain these sites:

Public interaction/Open Government activities: Treasury uses and maintains social media to further the principles of transparency, participation, and collaboration to foster a culture of open government throughout the Department. Any information that Treasury collects to further this purpose is consistent with the President’s Memorandum on Transparency and Open Government¹⁴ and the Director of the Office of Management and Budget’s (OMB) Open Government Directive Memorandum.¹⁵ Treasury’s social media websites also provide a forum for the public to comment on the agency’s activities.

Recruitment and/or employee outreach: To recruit and hire from the widest possible pool of candidates, Treasury uses third-party websites or applications to attract new hires or to inform or receive feedback from current employees. This is achieved through the maintenance of Treasury LinkedIn pages. Treasury does not collect information from these pages, but interacts with job seekers by posting links to new job announcements on USA Jobs.

5.2 Ensuring accuracy, completeness, and timeliness of information maintained, used and shared

The Privacy Act requires that agencies:

“maintain all [records](#) which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.”¹⁶

The Act only applies to records containing PII that are maintained in a “system of records.” This means that the records must be maintained in an information system or paper file and then retrieved by a personal identifier. Treasury does not, however, maintain and retrieve any of the information derived from social media using a personal identifier. Treasury does not use any information derived from social media websites to make any determinations about anyone.

While Treasury’s use of social media falls outside of the scope of the Privacy Act, the Department nevertheless applies the fair information practice principles and works to ensure the accuracy, completeness, and timeliness of information maintained, used and shared. Treasury recognizes that information is more likely to be accurate when it is derived directly from the individual. All information Treasury collects from third-party social media websites is derived from the individual.

Direct Collection from Individuals When Information May Result in Adverse Determinations

The Privacy Act requires that federal agencies, “collect information to the greatest extent

¹⁴ Transparency and Open Government Memorandum for the Heads of Executive Departments and Agencies https://www.whitehouse.gov/the_press_office/TransparencyandOpenGovernment

¹⁵ OMB Memorandum M-10-06, Open Government Directive https://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-06.pdf

¹⁶ 5 U.S.C. § 552a.(e)(5).

practicable directly from the subject individual when the information may result in adverse determinations about an individual's rights, benefits, and privileges under Federal programs.”, 5 U.S.C. § 552a(e)(2). Information derived from the individual is more likely to be accurate. Treasury, however, does not use any information derived from social media to make adverse determinations about anyone. Treasury assumes that the individual providing the information is the account holder identified in the account name for the person providing the information, but recognizes that social media accounts are sometimes used by third-parties with or without the consent of the account holder. Therefore, Treasury does not make any adverse determinations about an individual's rights, benefits, and privileges under federal programs based on information collected from third-party websites. Visitors to Treasury's third-party webpages may, however, be subject to the third-party website's rules as stated in its privacy and usage policy over which Treasury has no control.

Information that visitors to Treasury's third-party webpages choose to post voluntarily on the website (including associating themselves with the site by, e.g., “friending” the page or signifying that they “like” something on the Treasury webpage) is public information. Therefore, Treasury has no control over the manner in which others (including the social media website) may use information visitors choose to share publicly.

Ensuring Fairness in Making Determinations about Individuals

Under the Privacy Act, all federal agencies are required to:

“maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.”¹⁷

If Treasury extracts information from a social media webpage, Treasury retains the information in the same form in which it was provided by the individual on the social media webpage. The individual who is the subject of the information provided it directly to the Treasury webpage or other social media. Therefore, Treasury assumes the accuracy of the information. Treasury does not use any of the information Treasury derives from its social media webpages to make any determinations about individuals.

5.3 Information sharing within the Department of the Treasury

Internal Information Sharing

PII derived from the following bureau third-party webpages is only shared with those Treasury officers and employees who have a need for the PII in the performance of their duties. This includes employees of the following bureaus who manage the Department's social media accounts: Departmental Offices, including the Troubled Asset Relief Program (TARP), and the Office of Financial Research (OFR); the Bureau of Engraving and Printing; the Bureau of the Fiscal Service; the Treasury Inspector General for Tax Administration (TIGTA); the Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP); and the United States Mint.

5.4 Information sharing with external (i.e., outside Treasury) organizations and individuals.

External Information Sharing

Third Party Social Media pages: Treasury does not share any of the PII that it derives from its

¹⁷ Section 552a(e)(5)

third-party websites with any organizations or agencies outside Treasury.

Section 6: Legal compliance with federal information management requirements

Responses to the questions below address the practical, policy and legal consequences of failing to comply with one or more of the following federal information management requirements and how Treasury mitigates those risks: (1) The Privacy Act of 1974 System of Records Notice Requirement; (2) the Paperwork Reduction Act; (3) the Federal Records Act; (4) the E-Government Act of 2002 security requirements; and (5) Section 508 of the Rehabilitation Act of 1973.

6.1 Privacy Act System of Records Notice (SORN)

For certain collections of PII, the Privacy Act requires that the agency publish a SORN in the *Federal Register*.

Compliance with the SORN Requirement

Treasury determined that the information it collects and maintains from social media websites is not covered by the Privacy Act, in part because Treasury does not maintain and retrieve that information “by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.” Therefore, a SORN is not required. Though not required by the Privacy Act, Treasury provided notice and an opportunity for the public to comment on the Treasury Public Engagement Page notice at 80 FR 36407. The Treasury Public Engagement Pages notice discusses the purpose of collection, the types of information collected, the uses of the information, sharing of the information, safeguards, and retention.

6.2 The Paperwork Reduction Act

The Paperwork Reduction Act (PRA) requires OMB approval before a federal agency may collect standardized (i.e., the same) data from 10 or more respondents within a 12-month period.

Compliance with the PRA Requirement

The OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*¹⁸ explains the application of the PRA for many uses of social media. For example, if a federal agency simply solicits comments from the public by posting general information and providing a means by which the public may comment, the PRA does not apply. This includes public comments sought in response to notices published in the Federal Register or other publications that request public comments on proposed regulations, or any general requests for comments “regardless of the form or format thereof.”¹⁹ OMB has clarified that this includes general information that an agency posts on social media websites for the purpose of soliciting comments from the public.

In accordance with the PRA and this memorandum, Treasury’s use of social media applications and websites to solicit unstructured public comment is excluded from the PRA’s OMB review and

¹⁸ OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, April 7, 2010. For more information please see:

https://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/SocialMediaGuidance_04072010.pdf

¹⁹ 5 CFR 1320.3(h)(4).

approval requirements.

6.3 Records Management - NARA/Federal Records Act Requirements

Records retention schedules determine the amount of time necessary to retain information to meet the needs of the project or system. Information is generally either disposed of or sent to the National Archives for permanent retention upon expiration of this period.

NARA Records Retention Requirements

If PII is posted on a social media website, it may become a federal record if it is used by Treasury to transact business. Most of the information that is posted by the public on Treasury social media webpages via is categorized as “non-record” unless Treasury performs some type of follow-up action to respond to a posted comment. For example, if Treasury responds to a post by a member of the public and uses the information provided in the comment as supporting documentation for a Treasury decision (white paper or Treasury policy,) that post and the Treasury response is a record. The retention schedule that applies to the information retained would depend upon the subject and records schedule for the Treasury decision. Under these circumstances, the Department must maintain a copy according to the requirements in the applicable records retention policy (policies that determine how long Treasury will retain information before destroying it or sending it to NARA for permanent archiving).

6.4 E-Government Act/NIST Compliance

The completion of Federal Information Security Modernization Act (FISMA) Security Assessment & Authorization process is required before a federal information system may receive Authority to Operate.

Federal Information System Subject to FISMA/ Security Assessment and Authorization

As noted previously, information from most Treasury social media websites is not maintained on a Treasury information system. When Treasury does maintain social media comments in a Treasury information system, safeguards are applied to prevent uses beyond those authorized by law and described in this PCLIA. Treasury protects the records it maintains in accordance with applicable rules and policies, including all applicable Treasury automated systems security and access policies. Treasury imposes strict controls to minimize the risk of compromising the information. Access to the information system and privileges to modify or remove information from the system is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions. All Treasury (and bureau) security requirements are met in the method of transferring information from Treasury’s third-party webpages to Treasury systems in which the information is maintained. Audit trails are regularly reviewed to ensure appropriate use, handling, and disclosure of PII maintained on all Treasury systems.

6.5 Section 508 of the Rehabilitation Act of 1973

When federal agencies develop, procure, maintain, or use Electronic and Information Technology (EIT), Section 508 of the Rehabilitation Act of 1973 (as amended in 1998) requires that individuals with disabilities (including federal employees) must have access and use (including privacy policies and directives as well as redress opportunities) that is comparable to that which is available to individuals who do not have disabilities.

Compliance with Section 508 of the Rehabilitation Act of 1973

While many of these social media websites may meet the requirements under Section 508, these third parties are not subject to the same legal requirements as federal agencies. Therefore, Treasury provides alternative 508 compliant sites where individuals with disabilities may access the same information. These alternative sites are listed below:

- Departmental Offices [Connect with Us](#)
 - Making Home Affordable
<https://www.makinghomeaffordable.gov/pages/default.aspx>
 - Office of Financial Research (OFR) www.financialresearch.gov;
- Bureau of Engraving and Printing <http://www.moneyfactory.gov/>;
- Bureau of the Fiscal Service <https://www.fiscal.treasury.gov/>;
- Treasury Inspector General for Tax Administration
<https://www.treasury.gov/tigta/>;
- Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP) only uses Twitter. All Twitter posts are sourced from information contained on www.SIGTARP.gov
- U.S. Mint <http://www.usmint.gov/>.

Section 7: Redress

7.1 Access under the Freedom of Information Act and Privacy Act

Treasury has a published process in place by which individuals may seek records under the [Freedom of Information Act](#) and [Privacy Act](#). This information can be found at 31 C.F.R. Part 1, Subtitle A, Subparts A and C.

7.2 Additional Redress Mechanisms

Treasury may provide additional redress mechanisms other than [Privacy Act](#) and FOIA remedies (e.g., a customer satisfaction unit; a complaint process) by which an individual may request access to and/or amendment of their information.

Appendices

There are seven appendices to this PCLIA. Each appendix discusses how each of the seven offices/bureaus discussed in this PCLIA comply with the requirements of OMB M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications*²⁰. For example, Appendix A covers Departmental Offices' social media use. If additional Treasury bureaus or programs open new accounts, close accounts, or modify their use of a particular social media website (or information on that site) identified in the appendices to this PCLIA, the bureau will complete a new appendix or update the relevant appendix to reflect the current status of its social media use.

²⁰ Please see the following link for more information:

https://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-23.pdf

Additional or updated appendices completed for new third-party social media website uses will be treated as if they are incorporated into this PCLIA. Therefore, if a particular third-party website is not discussed in the text of the main PCLIA, please see the appendices for a discussion of that use.

Appendix A: Departmental Offices	Appendix E: Bureau of the Fiscal Service
Appendix B: Office of the Special Inspector General for the Troubled Asset Relief Program	Appendix F: Treasury Inspector General for Tax Administration
Appendix C: Office of Financial Research	Appendix G: U.S. Mint
Appendix D: Bureau of Engraving and Printing	

Responsible Officials

Timothy Skinner
Departmental Offices Privacy and Civil Liberties Officer
Approval Signature

Timothy Skinner, Departmental Offices Privacy and Civil Liberties Office

Appendix A: Departmental Offices

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all Departmental Offices (DO) existing and future uses of social media.

Applicable Social Media Sites

DO maintains an official presence on the following social media websites: [Facebook](#)²¹, [Flickr](#)²², [Google+](#)²³, [LinkedIn](#)²⁴, [Twitter](#)²⁵, and [YouTube](#)²⁶.

Alternatives to Social Media

DO provides the public with alternatives to posting information or questions on third-party social media websites and applications. The public can obtain comparable information and services by visiting DO official websites and communicate with Treasury without having to join a third-party social media website by visiting the [Connect with Us](#) page on the Treasury website²⁷. In addition, if DO uses a third-party service to solicit feedback, the Treasury page on the social media website will also provide an alternative government email address where users can send feedback.

Review of Social Media Website Privacy Policies

DO reviews the privacy policies of each social media website where it maintains an official page. DO evaluates risks before using new social media websites and applications and monitors changes to privacy policies to determine whether it needs to reevaluate the risks associated with its uses of these websites. Treasury conducts these reviews through its Privacy Threshold Assessment (PTA) and PCLIA process to identify and mitigate the risks prior to publishing a new Treasury social media page.

External Links

DO provides an alert to users when Treasury.gov or another DO website links to an external social media site. Therefore, if there is a link on an official DO owned and operated website that will take a visitor to another website that is not covered by a Treasury privacy policy, Treasury provides an alert to notify the visitor that they are leaving the official Treasury site. For example, on Treasury's official [Connect with Us](#) page Treasury provides a link to Twitter, Facebook, Flickr and YouTube. If a visitor clicks on any of the social media sites linked to that page, a message will pop up that states, "You are leaving the Treasury.gov Website. Please check the Privacy Policy of the site you are visiting." This ensures that visitors understand when they are leaving the Treasury website and entering a social media website where the terms of service and privacy policies are different.

Embedded Applications

DO provides notice to users who visit official Treasury owned and operated websites (as opposed to Treasury pages on third-party websites) when the website embeds a link to a social media

²¹ <https://www.facebook.com/ustreasury>

²² <https://www.flickr.com/people/ustreasury/>

²³ <https://plus.google.com/107204431997351213963/videos>

²⁴ <https://www.linkedin.com/company/us-treasury>

²⁵ <https://twitter.com/ustreasury>

²⁶ <https://www.youtube.com/user/USTreasGov/featured>

²⁷ For more information see, <http://www.treasury.gov/connect/Pages/default.aspx>

website or application on the page. Through the Department's privacy policies linked to each official site, Treasury discloses its involvement with the third party social media site and describes the Department's activities.

Branding

All official DO third-party social media sites contain the Treasury/bureau seal. DO does this to ensure that users are aware that they are engaging with the Treasury. DO also includes links to the Treasury privacy policy on certain social media pages to ensure that users who visit those sites understand how the Department uses PII made available to it via social media. The policy explains that the website or application is not a government website or application, that it is controlled or operated by a third-party, and that Treasury's Privacy Policy does not apply to the third party. The notice indicates whether and how Treasury will maintain, use, or share PII that becomes available through the use of the third-party website or application. It also explains that by using the website or application to communicate with the Department, individuals may be providing non-government third parties access to PII. Finally, the notice directs individuals to the agency's official website and Privacy Policy.²⁸

Information collection

In most instances, DO does not collect the PII made available through the use of third party social media webpages. However, there are some limited circumstances when DO will collect PII from social media sites. When DO does collect PII it collects only the minimum information necessary to carry out the Department's mission.

Privacy Policy

DO's [privacy policy](#) found on Treasury.gov incorporates the use of social media for public engagement purposes. It also includes links to the privacy policies of the third party social media social media sites where DO maintains an official presence.

Privacy Notices

DO includes a link to a privacy notice or a link to the applicable section of the DO Privacy Policy on third party social media pages²⁹ that: (1) explains that the website or application is not a government website or application, that it is controlled or operated by a third party, and that the DO's Privacy Policy does not apply to the third party; (2) indicates whether and how the Treasury will maintain, use, or share PII that becomes available through the use of the third-party website or application; (3) explains that by using the website or application to communicate with the agency, individuals may be providing nongovernment third parties access to PII; (4) directs individuals to the agency's official website; and (5) directs individuals to the agency's Privacy Policy as described above.

²⁸ The Treasury.gov privacy policy can be found here: <http://www.treasury.gov/SitePolicies/Pages/privacy.aspx>.

²⁹ The location of this notice varies depending on the format of the third-party social media website, however DO/Treasury takes reasonable steps to ensure that the notice/ link is conspicuous, salient, clearly labeled, and prominently displayed.

Appendix B: Special Inspector General for the Troubled Asset Relief Program (SIGTARP)

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all SIGTARP existing and future uses of social media.

Applicable Social Media Sites

SIGTARP maintains an official presence on the following social media websites: Twitter (<https://twitter.com/sigtarp>).

Alternatives to Social Media

SIGTARP provides the public with alternatives to posting information or questions on third-party social media websites and applications. The public can obtain comparable information and services by visiting SIGTARP's website, <http://www.sigtarp.gov>.

Review of Social Media Website Privacy Policies

SIGTARP:

- Reviews the privacy policies of each social media website where it maintains an official page.
- Evaluates risks before using new social media websites and applications and monitors changes to privacy policies to determine whether it needs to reevaluate risks associated with uses of these websites.
- Conducts reviews through its Privacy Threshold Assessment (PTA) and PCLIA process to identify and mitigate the risks prior to publishing a new Treasury social media page.

External Links

- Provides an alert to users when sigtarp.gov website links to an external social media site.
- Therefore, if there is a link on an official SIGTARP owned and operated website that will take a visitor to another website that is not covered by SIGTARP privacy policy, SIGTARP provides an alert to notify the visitor that they are leaving the official site.
- For example, on SIGTARP's official sigtarp.gov page, SIGTARP provides a link (via button icon) to its Twitter page. If a visitor clicks on that link, a message will pop up that states, "You are leaving the SIGTARP public Web site and going to a Web site that SIGTARP does not control and whose privacy policies may differ." This ensures that visitors understand when they are leaving the Treasury website and entering a social media website where the terms of service and privacy policies are different.

Embedded Applications

- SIGTARP provides notice to users who visit official SIGTARP owned and operated websites when the website embeds a link to a social media website or application on the page. Through the SIGTARP privacy policy linked to each official site, SIGTARP discloses its involvement with the third party social media site and describes its activities. For example, the SIGTARP privacy policy states, in part: "SIGTARP uses 3rd party social media sites such as Twitter as additional means of reaching the public and directing people to www.SIGTARP.gov, which is the official website of the Office of the Special Inspector General for the Troubled Asset Relief Program."

Branding

All official SIGTARP third-party social media sites contain the Treasury/bureau seal. SIGTARP does this to ensure that users are aware that they are engaging with SIGTARP.

- SIGTARP also includes a link to its privacy policy on its Twitter social media page to ensure that users who visit those sites understand how the Department uses PII made available to it via social media.
- The policy explains that the website or application is not a government website or application, that it is controlled or operated by a third-party, and that SIGTARP's Privacy Policy does not apply to the third party. The policy indicates whether and how SIGTARP will maintain, use, or share PII that becomes available through the use of the third-party website or application. It also explains that by using the website or application to communicate with the Department, individuals may be providing non-government third parties access to PII. Finally, the notice directs individuals to SIGTARP's official website and Privacy Policy, at <https://www.sigtar.gov/pages/privacy.aspx>.

Information Collection

SIGTARP may receive PII that individuals send to it via Twitter "direct message," although SIGTARP does not encourage the public to send such information and no such direct message via Twitter has been received as of the publication of this Appendix. SIGTARP does not actively attempt to collect PII via any third-party webpage.

Privacy Policy

SIGTARP's privacy policy found on SIGTARP.gov incorporates the use of social media for public engagement purposes. It also includes links to the privacy policies of the third party social media sites where SIGTARP maintains an official presence. SIGTARP's Twitter account is designed and intended to communicate information to the general public, not to collect information, PII or otherwise.

Privacy Notices

SIGTARP includes a link to its Privacy Policy on its Twitter page/account. This Privacy Policy: (1) explains that the website or application is not a government website or application, but rather is controlled or operated by a third party, and that SIGTARP's Privacy Policy does not apply to the third party; (2) indicates whether and how the Treasury will maintain, use, or share PII that becomes available through the use of the third-party website or application; (3) explains that by using the website or application to communicate with the agency, individuals may be providing nongovernment third parties access to PII; (4) directs individuals to the agency's official website; and (5) directs individuals to the agency's Privacy Policy.

Appendix C: Office of Financial Research (OFR)

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all OFR existing and future uses of social media.

Applicable Social Media Sites

The OFR maintains an official presence on the following social media websites: [Twitter](#)³⁰, [GitHub](#)³¹

Alternatives to Social Media

OFR provides the public with alternatives to posting information or questions on third-party social media websites and applications. The public can obtain comparable information and services by visiting the official OFR Website, www.financialresearch.gov, and may communicate with OFR without having to join a third-party social media website by using the “[Contact Us](#)” functions outlined on financialresearch.gov.

Review of Social Media Website Privacy Policies

OFR reviews the privacy policies of each social media website where it maintains an official page to evaluate the risks, and determine whether the tool aligns to the OFR’s Privacy Principles, its web privacy policies, and is otherwise appropriate for the OFR’s use. OFR evaluates risks before using new social media websites and applications and monitors changes to privacy policies to determine whether it needs to reevaluate the risks associated with its uses these websites. OFR conducts these reviews in accordance with its *Privacy Guidance for Third Party Tool Usage*, and documents such reviews through the Treasury coordinated Privacy and Civil Liberties Threshold Assessment (PCLTA) and PCLIA processes to identify and mitigate risks prior to launching a new OFR social media page.

External Links

Any links to third-party, non-government websites included on OFR publicly-facing websites include some form of notice alerting the individual that they are leaving the OFR’s website and are as such, subject to the privacy and security policies and terms and conditions of the destination site. This is achieved via a pop-up interstitial, flyover, or similar method. All such notices are reviewed and approved by the OFR ADIS and Privacy Officer.

For example, on financialresearch.gov, OFR provides embedded links that allow individuals to “share” information from the OFR page on financialresearch.gov through Facebook, Google+, LinkedIn, or Twitter. When users pass their mouse over, or click any of these buttons, a message pops up which states:

“Click to share this content on Twitter.com. Please note that OFR does not own or endorse this website; by visiting it you are subject to the destination site’s privacy and other policies.”

³⁰ <https://twitter.com/ofrgov>

³¹ <https://github.com/financialresearch> (Please note, at time of publication OFR has not gone live with its GitHub page).

Likewise, OFR provides a link/button that redirects users to its Twitter presence to “follow” OFR. When users move their mouse over or click this button, a similar message pops up.

Embedded Applications

Currently, OFR owns and operates one website, financialresearch.gov. Financialresearch.gov does not include embedded links to social media websites or applications, other than those outlined in the “External Links” section of this appendix. Notice is provided as described in that section to inform users that they are being redirected to a non-government third-party site. Additionally, through the OFR’s [Website Privacy Policy](#)³² included on financialresearch.gov and linked on the OFR’s Twitter and GitHub pages, OFR discloses its involvement with third party social media sites and describes the office’s activities.

Branding

All official OFR third-party social media sites contain the OFR seal/logo. OFR does this to ensure that users are aware that they are engaging with the OFR. OFR also includes links to the OFR [Website Privacy Policy](#) available on its official website, www.financialresearch.gov, on all official social media pages to ensure that users who visit those sites understand how the OFR uses PII made available to it via social media. The policy explains that these websites/applications are not government owned or operated, are controlled or operated by a third-party, and that the OFR’s privacy and security policies do not apply to the third party. The notice indicates whether and how the OFR will maintain, use, or share PII that becomes available through the use of the third-party website or application. It also explains that by using the website or application to communicate with the OFR, individuals may be providing non- government third parties access to PII.

Information Collection

OFR does not collect the PII made available through the use of third-party social media webpages.

Privacy Policy

OFR’s Website Privacy Policy found on financialresearch.gov incorporates the use of social media for public engagement purposes. It also includes links to the privacy policies of the third party social media social media sites where OFR maintains an official presence.

Privacy Notices

OFR includes a link to the applicable section of the OFR Website Privacy Policy on third party social media pages³³ that: (1) explains that the website or application is not a government website or application, that it is controlled or operated by a third party, and that the OFR’s privacy and security policies do not apply to the third party; (2) indicates whether and how the OFR will maintain, use, or share PII that becomes available through the use of the third-party website or application; (3) explains that by using the website or application to communicate with the agency, individuals may be providing nongovernment third parties access to PII; (4) directs individuals to the agency’s official website; and (5) directs individuals to the agency’s Website Privacy Policy as described above.

³² <http://financialresearch.gov/privacy-policy/>

³³ The location of this notice varies depending on the format of the third-party social media website, however OFR takes reasonable steps to ensure that the notice/ link is conspicuous, salient, clearly labeled, and prominently displayed.

Appendix D: Bureau of Engraving and Printing (BEP)

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed a Privacy and Civil Liberties Impact Assessment (PCLIA) that applies to all uses of social media for public engagement purposes across the Department. The following PCLIA applies to the Bureau of Engraving and Printing's (BEP) existing uses of social media provided by third-party websites and applications that (1) do not use web measurement and customization technologies on behalf of the BEP and (2) do not share Personally Identifiable Information (PII), or any information that could be used to determine an individual's online activity derived from such uses with the BEP. Opening or closing new social media accounts or modifying the use of any existing social media will require a revision of this PCLIA.

Applicable Social Media Sites

The BEP maintains a presence on the following social media third-party websites:

YouTube: <https://www.youtube.com/@bepgov>

Facebook: <https://www.facebook.com/bepgov/>

Twitter: <https://twitter.com/bepgov>

Instagram: <https://www.instagram.com/bepgov/>

LinkedIn: <https://www.linkedin.com/company/bureau-of-engraving-and-printing/>

Alternatives to Social Media

The BEP provides the public with alternatives to seeking information or submitting questions on third-party social media websites and applications. The public can obtain comparable information and services by (1) visiting BEP's website at www.bep.gov or www.moneyfactory.gov; (2) calling BEP at 1-877-874-4114 (toll-free) or (202) 874-4000; or (3) emailing at moneyfactory.info@bep.gov.

Review of Social Media Third-Party Website Privacy Policies

The BEP reviewed the privacy policies and risks of each social media third-party website where it maintains an account in accordance with BEP's Social Media Policy, Circular 40-00.14 (December 20, 2016). BEP will monitor the privacy policies of each social media third-party website to determine whether it needs to reevaluate the risks associated with its uses. In the future, BEP will conduct the same review to identify and mitigate the risks, and determine whether the social media third-party website aligns with BEP's Social Media Policy prior to opening a new third-party social media website.

External Links and Embedded Applications

The BEP provides notice to users when BEP's website (i.e. moneyfactory.gov or bep.gov) links to a third-party website or application is not covered by BEP's Privacy Policy. For example, BEP's website provides a link to BEP's Facebook, Twitter, and YouTube account. If a visitor clicks on the link of any BEP social media account available in BEP's website, they will receive an alert stating "You are about to leave the official BEP website" with a notice that they are visiting a third-party website or application that may have different privacy policies from BEP to ensure the visitor understands they are being redirected to a third-party site.

Branding

BEP's Facebook, Twitter, and YouTube accounts contain the BEP seal or emblem to ensure that users are aware that they are engaging with the BEP.

Information Collection

In accordance with BEP's Social Media Policy, BEP may deactivate the comments/reply capability of any third-party social media website or application and may remove any communication containing PII. The BEP does not collect the PII made available through the use of third-party social media websites or applications. While the public can post information in BEP's Twitter and Facebook accounts, BEP's YouTube account is designed solely for one-way information sharing between BEP and the public and does not allow users to post information.

Privacy Policy

BEP's Privacy Policy for Social Media is available in BEP's Social Media Policy, Circular 40-00.14 (December 20, 2016) and BEP's website at

<http://www.moneyfactory.gov/privacystatements.html>. BEPs' website also includes links to the privacy policies of the third-party social media websites where BEP maintains an account.

Privacy Notices

BEP provides a Privacy Notice or a link to the applicable section of the BEP's Privacy Policy on all BEP's third-party social media websites in accordance with BEP's Social Media Policy. The Privacy Notice alerts individuals that the third-party website or application is: (1) not owned by BEP or the U.S. Government; (2) controlled or operated by a third party; (3) not subject to BEP's Privacy Policy for Social Media; and (4) accessing PII when users to communicate with the BEP. Lastly, BEP's Privacy Notice directs individuals to BEP's website, which includes BEP's Privacy Policy for Social Media as described above.

Appendix E: Bureau of the Fiscal Service (Fiscal Service)

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all Fiscal Service existing and future uses of social media.

Applicable Social Media Sites

Fiscal Service maintains an official presence on the following social media platforms : [Facebook](#)³⁴, [LinkedIn](#)³⁵, [Twitter](#)³⁶, and [YouTube](#)³⁷.

Alternatives to Social Media

Fiscal Service provides the public with alternatives to posting information or questions on third-party social media websites and applications. The public can obtain comparable information and services by visiting Fiscal Service official websites and communicate with the Bureau without having to join a third-party social media website by visiting the [Contact Us page](#) on the Fiscal Service website. In addition, if Fiscal Service uses a third-party service to solicit feedback, the Fiscal Service page on the social media website will also provide an alternative government email address where users can send feedback.

Review of Social Media Website Privacy Policies

Fiscal Service reviews the privacy policies of each social media website where it maintains an official page. Fiscal Service evaluates risks before using new social media websites and applications and monitors changes to privacy policies to determine whether it needs to reevaluate the risks associated with its uses of these websites. Fiscal Service conducts these reviews through its Privacy Threshold Assessment (PTA) and PCLIA process to identify and mitigate the risks prior to publishing a new Fiscal Service social media page.

External Links

Fiscal Service provides an alert to users when Fiscal.Treasury.gov or another Fiscal Service website links to an external social media site. Therefore, if there is a link on an official Fiscal Service owned and operated website that will take a visitor to another website that is not covered by a Fiscal Service privacy policy, the Bureau provides an alert to notify the visitor that they are leaving the official Fiscal Service site. For example, on the Fiscal Service website footer there are links to Twitter, Facebook, and YouTube. If a visitor clicks on any of the social media sites linked to that page, a message will pop up that states, “You're going to a website that is not managed or controlled by the Bureau of the Fiscal Service. Its privacy policies may differ from ours.” This ensures that visitors understand when they are leaving the Fiscal Service website and entering a

³⁴ <https://www.facebook.com/fiscalservice>

³⁵ <https://www.linkedin.com/company/bureau-of-the-fiscal-service/>
<https://www.linkedin.com/showcase/fiscal-service-fit/>

³⁶ <https://twitter.com/fiscalservice>
<http://twitter.com/treasurydirect>
<https://twitter.com/usaspending>
<https://twitter.com/USDirectExpress>

³⁷ <https://youtube.com/@fiscalservice>
<https://www.youtube.com/user/USAspending>
<https://youtube.com/@TREASURYDIRECT>

social media website where the terms of service and privacy policies are different.

Embedded Applications

Fiscal Service provides notice to users who visit official Fiscal Service owned and operated websites (as opposed to Fiscal Service pages on third-party websites) when the website embeds a link to a social media website or application on the page. Through the Bureau's privacy policies linked to each official site, Fiscal Service discloses its involvement with the third party social media site and describes the Bureau's activities.

Branding

All official Fiscal Service third-party social media sites contain the bureau seal or logo. Fiscal Service does this to ensure that users are aware that they are engaging with the Bureau. Fiscal Service also includes links to the Fiscal Service privacy policy on certain social media pages to ensure that users who visit those sites understand how the Bureau uses PII made available to it via social media. The policy explains that the website or application is not a government website or application, that it is controlled or operated by a third-party, and that Fiscal Service's Privacy Policy does not apply to the third party. The notice indicates whether and how Fiscal Service will maintain, use, or share PII that becomes available through the use of the third-party website or application. It also explains that by using the website or application to communicate with the Bureau, individuals may be providing non-government third parties access to PII. Finally, the notice directs individuals to the bureau's official website and Privacy Policy.³⁸

Information Collection

In most instances, Fiscal Service does not collect the PII made available through the use of third party social media webpages. When Fiscal Service does collect PII it collects only the minimum information necessary to carry out the Bureau's mission.

Privacy Policy

Fiscal Service's [privacy policy](#) found on fiscal.treasury.gov incorporates the use of social media for public engagement purposes. It also includes links to the privacy policies of the third-party social media sites where Fiscal Service maintains an official presence.

Privacy Notices

Fiscal Service includes a link to a privacy notice or a link to the applicable section of the Fiscal Service Privacy Policy on third party social media pages that: (1) explains that the website or application is not a government website or application, that it is controlled or operated by a third party, and that the Fiscal Service's Privacy Policy does not apply to the third party; (2) indicates whether and how Fiscal Service will maintain, use, or share PII that becomes available through the use of the third-party website or application; (3) explains that by using the website or application to communicate with the bureau, individuals may be providing nongovernment third parties access to PII; (4) directs individuals to the bureau's official website; and (5) directs individuals to the bureau's Privacy Policy as described above.

³⁸ The [fiscal.treasury.gov](https://fiscal.treasury.gov/privacy) privacy policy can be found here: https://fiscal.treasury.gov/fsabout/fs_privacy.htm

Appendix F: Treasury Inspector General for Tax Administration (TIGTA)

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all TIGTA existing and future uses of social media.

Applicable Social Media Sites

TIGTA maintains a presence on the following social media websites:

Youtube: <https://www.youtube.com/user/TIGTAVIDEOS>.

Alternatives to Social Media

TIGTA encourages the public to seek information and post questions on its official website, [Home | U.S. Treasury Inspector General for Tax Administration OIG \(tigta.gov\)](http://www.tigta.gov)

Review of Social Media Website Privacy Policies

- TIGTA will review the privacy policies of each social media website where it maintains an official page.
- TIGTA will evaluate risks before using new social media websites and applications and monitor changes to privacy policies to determine whether it needs to reevaluate the risks associated with its uses these websites.
- TIGTA will conduct these reviews through its Privacy Threshold Assessment (PTA) and PCLIA process to identify and mitigate the risks prior to publishing a new official Treasury social media page.

External Links

- TIGTA will provide an alert to users when TIGTA's website links to an external social media site.
- Therefore, if there is a link on an official TIGTA-owned and operated website that will take a visitor to another website that is not covered by TIGTA's privacy policy, TIGTA will provide an alert to notify the visitor that they are leaving the official site.
- For example, if TIGTA's official website links to its YouTube channel, if a visitor clicks on the social media site linked to that page, a message will pop up that states that the visitor is now leaving an official government website. This ensures that visitors are informed that when they are leaving the TIGTA website and entering a social media website where the terms of service and privacy policies are different.

Embedded Applications

- TIGTA will provide notice to users who visit official TIGTA owned and operated websites; when the website embeds a link to a social media website or application on the page. Through the TIGTA privacy policy linked to each official site, TIGTA will disclose its involvement with the third party social media site and describe the Department's activities.

Branding

- All official TIGTA third-party social media sites contain the bureau seal. TIGTA does this to ensure that users are aware that they are engaging with TIGTA.
- TIGTA will also include links to the Treasury privacy policy on certain social media pages

to ensure that users who visit those sites understand how the Department uses PII made available to it via social media.

- The policy will explain that the website or application is not a government website or application, that it is controlled or operated by a third-party, and that TIGTA's Privacy Policy does not apply to the third party. The policy will indicate whether and how TIGTA will maintain, use, or share PII that becomes available through the use of the third-party website or application. It will also explain that by using the website or application to communicate with the Department, individuals may be providing non-government third parties access to PII. Finally, the notice will direct individuals to the agency's official website and Privacy Policy.⁴³

Information Collection

TIGTA does not collect the PII made available through the use of third party social media webpages.

Privacy Policy

TIGTA's privacy policy is currently being revised to incorporate the use of social media for public engagement purposes. It will also include links to the privacy policies of the third party social media social media sites where TIGTA maintains an official presence.

Privacy Notices

TIGTA will include a link to a privacy notice or a link to the applicable section of the TIGTA Privacy Policy on third party social media pages⁴⁴ that: (1) explains that the website or application is not a government website or application, that it is controlled or operated by a third party, and that TIGTA's Privacy Policy does not apply to the third party; (2) indicates whether and how TIGTA and the Treasury will maintain, use, or share PII that becomes available through the use of the third-party website or application; (3) explains that by using the website or application to communicate with the agency, individuals may be providing nongovernment third parties access to PII; (4) directs individuals to the agency's official website; and (5) directs individuals to the agency's Privacy Policy as described above.

Appendix G: United States Mint

In accordance with the principles set forth in the Privacy Act of 1974, and the requirements of OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), Treasury developed social media requirements that apply to all uses of social media for public engagement purposes across the Department. The following statements apply to all United States Mint existing and future uses of social media.

Applicable Social Media Sites

The United States Mint maintains an official presence on the following social media websites: Facebook, Instagram, LinkedIn, Twitter, Pinterest, and YouTube.

- Facebook: <https://www.facebook.com/UnitedStatesMint>
- Instagram: <https://www.instagram.com/unitedstatesmint>
- LinkedIn: <https://www.linkedin.com/company/united-states-mint>
- Twitter: <https://twitter.com/usmint>
- Pinterest: <https://www.pinterest.com/usmint/>
- YouTube: <https://www.youtube.com/user/USMINT>

Alternatives to Social Media

The United States Mint provides the public with alternatives to posting information or questions on third-party social media websites and applications. The public can obtain comparable information and services by visiting United States Mint official websites and communicate with the United States Mint by calling 1-800-USA-MINT for catalog inquiries and by visiting its [Contact Us page](#) for subject-specific contact numbers and addresses.

Review of Social Media Website Privacy Policies

The United States Mint reviews the privacy policies of each social media website where it maintains an official page. It evaluates risks before using new social media websites and applications, and reviews existing privacy policies to determine whether the privacy policy needs to be re-evaluated for risks associated with its uses of these websites. The United States Mint conducts these reviews through the completion of Department of the Treasury Privacy Threshold Assessment (PTA) and Privacy and Civil Liberties Impact Assessment (PCLIA) process to identify and mitigate the risks prior to publishing a new social media page.

External Links

The United States Mint provides a notice to users when usmint.gov or another United States Mint website contains links to an external social media site. When an official United States Mint owned and operated website contains a link that takes a visitor to another website not covered by a United States Mint privacy policy, the United States Mint provides a notice informing the visitor that they are leaving the official United States Mint site for a site outside the federal government. The notice cautions that the bureau does not control the destination site, its contents, or its privacy policy, and encourages the visitor to review the external site's privacy policy to learn about its information collection practices. It also cautions that links do not constitute the United States Mint's endorsement of the site or its information. For example, on a United States Mint website that provides a link to Facebook, clicking on the Facebook link takes the visitor to an intervening redirect exit page containing the exit notice, and then to

the social media site, giving the visitor the opportunity to choose to proceed to the social media site or return to Mint's own website. The notice states: "You are about to leave the official United States Mint website to go to: <http://www.facebook.com/UnitedStatesMint>

The link you selected is for a destination outside of the Federal Government. The United States Mint does not control this external site or its privacy policy, and cannot attest to the accuracy of the information it contains. You may wish to review the privacy policy of the external site as its information collection practices may differ from ours. Linking to this external site does not constitute an endorsement of the site or the information it contains by the United States Mint or any of its employees. Click Continue if you wish to go to this website; otherwise, click Cancel to return to our site."

Embedded Applications

The United States Mint provides a notice to users who visit official United States Mint owned and operated websites when the website embeds a link to a social media website or application on the page. Through the bureau's privacy policy, the United States Mint discloses its involvement with the third-party social media site and describes its activities. For example, the United States Mint's privacy policy states that the bureau uses third-party social media websites as additional ways to interact with members of the public and to promote awareness of the United States Mint and the products it offers.

Branding

All official the United States Mint third-party social media sites contain the United States Mint trademarked coin flip logo or its official seal. The United States Mint does this to ensure that users are aware that they are engaging with the United States Mint.

Information Collection

In most instances, the United States Mint does not collect the PII made available through the use of third-party social media websites. Its privacy policy states that we do "not use these Web sites to solicit and collect personally identifiable information from individuals, and encourage you not to publicly post personally identifiable information on our official pages on such Web sites." However, there are some limited circumstances when the United States may collect PII from social media sites. In that case, it collects only the minimum information necessary to carry out its official business.

Privacy Policy

The United States Mint privacy policy at usmint.gov addresses the bureau's use of social media for public engagement. It explains that when the public visits third-party websites, those sites' security and privacy policies apply. The United States Mint provides links to the privacy policies of all of the United States Mint's social media sites, and encourages the public to review and understand the privacy policies of these third-party websites before visiting them.

Privacy Notices

The United States Mint includes a link to a privacy notice or a link to the applicable section of the United States Mint Privacy Policy on its official third-party social media websites.