

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

September 21, 2015

OPDIV:

CMS

Name:

Twitter

TPWA Unique Identifier:

T-6390556-589399

Is this a new TPWA?

Yes

Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?

No

Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?

No

Does the third-party Website or application contain Federal Records?

No

Describe the specific purpose for the OPDIV use of the third-party Website or application:

HealthCare.gov has created and maintains an educational presence on Twitter in the form of a HealthCare.gov branded page. This page allows for a direct connection with end users to provide broad educational opportunities and limited opportunities to address consumer questions and concerns. Twitter is a popular platform where users can consume and interact (Favorite, ReTweet, Reply) with content related to their friends, and personal interests. HealthCare.gov has created a branded page on Twitter to provide educational content in a space where many potential end users of products made available on HealthCare.gov are already spending their time online. The primary purpose of having a branded page on Twitter is to promote information related to HealthCare.gov and to provide resources to consumers who may not be regular visitors to the HealthCare.gov website; occasionally we will leverage the innate social sharing capacity of this platform by asking fans of our branded page to ReTweet our content with their friends and followers on the platform for the purpose of disseminating a particular message as it relates to an initiative or information related to HealthCare.gov.

Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?

Yes

Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:

Consumers are also educated through traditional advertising through TV, radio, HealthCare.gov and local partners/counseling entities and events. Additionally information is available through other 3rd party digital properties such as YouTube, Facebook, and Google+.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?

Yes

How does the public navigate to the third party Website or application from the OPDIV?

An external hyperlink from an HHS Website or Website operated on behalf of HHS

Please describe how the public navigate to the thirdparty website or application:

Directly through Twitter.com, via a connect icon on the HealthCare.gov site, using a web search or via a web-based URL to content hosted on Twitter.com.

If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to anongovernmental Website?

Yes

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?

Yes

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.healthcare.gov/privacy/>

Is an OPDIV Privacy Notice posted on the third-part website or application?

No

Is PII collected by the OPDIV from the third-party Website or application?

No

Will the third-party Website or application make PII available to the OPDIV?

Yes

Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:

CMS does not collect any PII through its use of Twitter. Individual users who register with Twitter are required to provide a first name, valid email address, password, and handle to create a personal Twitter profile. Once registered, users have the option to provide a wealth of additional information about themselves such as telephone number, interests, etc. which may be accessible on the individual user's personal Twitter profile page based on who they follow or otherwise maintained or used by Twitter (see [Twitter.com/privacy](https://twitter.com/privacy) for review of their data policy, and how they may use the provided information).

This information may be available to CMS page administrators in whole or part, based on a user's privacy settings. CMS does not solicit, collect, or maintain any personally identifiable information from individuals who visit, favorite, retweet, reply, or otherwise engage with the HealthCare.gov Twitter page or tweets. The HealthCare.gov Twitter page administrator may however, read, review, or rely upon information that individuals make available on Twitter in the form of replies, use of hashtags, or "@ mentions" for the purposes of responding to a user's question. Even though this information may be accessible to HealthCare.gov's Twitter page administrators, CMS does not collect, disseminate, or maintain any of the information provided on HealthCare.gov's Twitter page.

Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:

This information is not shared beyond HealthCare.gov Twitter Administrators. It is not collected outside of Twitter or used for other CMS purposes.

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

This data is kept within the Twitter platform. It is not downloaded into other tools and or repositories

Will the PII from the third-party website or application be maintained by the OPDIV?

No

Describe how PII that is used or maintained will be secured:

CMS does not keep separate records or accounting of Twitter users or their interaction with the HealthCare.gov Twitter page. CMS does not store or share this information. User information is retained by Twitter as long as a user maintains a Twitter account. See Twitter's privacy policy to see how long user information is retained after an account has been deleted. Twitter users can learn more about how their information is used and maintained by Twitter by visiting Twitter's data policy located at www.Twitter.com/privacy.

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

Note in reference to Question 15b - Due to limitations on Twitter, the HealthCare.gov Privacy Notice is not posted on the the HealthCare.gov Twitter page. However, a URL to [HealthCare.gov/privacy](https://www.healthcare.gov/privacy) is referenced in the bio section of the page, the only space available to include any privacy related information.

In addition to the link on Twitter consumers are provided notice on HealthCare.gov. A link to our Linking Policy is in the footer of HealthCare.gov. Our Linking Policy includes a privacy notice for social media sites and provides links to HealthCare.gov presences on Third Party sites as well as the privacy policies of those social media sites. Additionally, when a consumer places their mouse cursor over a link to a social media site, hover text informs them that they will be "Leaving HealthCare.gov" if they click.

Twitter is a third-party service that uses persistent tracking technologies. In an effort to help consumers understand how their information is used by Twitter, the HealthCare.gov Twitter page includes a link to a privacy notice at [HealthCare.gov/privacy](https://www.healthcare.gov/privacy), which addresses this topic. As mentioned above, due to limitations on Twitter, the HealthCare.gov Privacy Notice is not posted on the HealthCare.gov Twitter page due to length limitations. However, a URL to the privacy notice on [HealthCare.gov/privacy](https://www.healthcare.gov/privacy) is prominently displayed.

The HealthCare.gov Privacy Notice Statement at HealthCare.gov directs Twitter users to review Twitter's terms of service and privacy policies to understand how Twitter may collect information about users, including what pages the user may visit, and how Twitter may use or share such information for third-party advertising or other purposes.

Twitter is created and maintained by Twitter. CMS has reviewed Twitter's privacy practices and has concluded that risks to consumer privacy are sufficiently mitigated through application of Twitter's privacy policies, notices from HealthCare.gov and Twitter informing consumers of these policies, and the ability of consumers to opt-out of providing their information to HealthCare.gov and Twitter.

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