ADAMS ML11307A211

U.S. Nuclear Regulatory Commission

UPDATED
Privacy Impact Assessment
for the
Official Presence Use of Social Media Platforms

Social media interactions and applications include a sphere of non-government websites and web-based tools that focus on connecting users, inside and outside of the Nuclear Regulatory Commission (NRC), to engage in dialogue, share information and media, and collaborate. Third parties control and operate these non-governmental websites; however, the NRC may use them as alternative channels to provide robust information and engage with the public. The NRC may also use these websites to make information and services widely available, while promoting transparency and accountability, as a service for those seeking information about or services from the NRC. This privacy impact assessment (PIA) analyzes the NRC's use of social media and how these interactions and applications could result in the NRC receiving personally identifiable information (PII). This PIA describes the information the NRC may have access to, how it will use the information, and what information is retained and shared. Appendix A of this PIA will serve as a listing, to be updated periodically, of NRC official presence social media interactions and applications that follow the requirements and analytical understanding outlined in this PIA.

Date updated by sponsoring office: November 2, 2011

A.   GENERAL PROJECT INFORMATION

1.   Provide a brief description of the project:

The NRC's Official Presence Social Media initiative is designed to increase the NRC's use of third party social media services in an incremental fashion, enabling the NRC to conduct its Open Government activities in new and innovative ways, while complying with applicable laws, policies and regulations. As an effort under the NRC's Open Government Flagship initiative[1], the implementation of an agency-wide official presence using third party social media services/sites supports new ways to increase transparency, collaboration and participation with the public and other key stakeholders. These planned social media activities are consistent with the NRC's current policies and procedures for the deployment of the tools and services envisioned under this effort. See

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1 NRC's Open Government Flagship Initiative, http://www.nrc.gov/public-involve/open/philosophy/nrc-open-gov-plan.pdf#page=35

Appendix A of this document for a list and description of the specific tools that are part of this initiative.

The use of social media platforms/tools represents a strategic communication mechanism to help the NRC expand outreach efforts to engage new audiences not currently accessing NRC information, and enable two-way dialogue with the public. These tools will be used to help individuals and organizations better understand the NRC's mission, roles, responsibilities, actions, and policies as well as provide them with more easily accessible information on specific topics of interest.

2.   What agency function does it support?

The requirements and associated recommendations for the use of social media services within this document are consistent with the NRC's Strategic Plan[2], the Office of Management and Budget (OMB) Open Government Directive[3], and the NRC's Open Government Plan[4]. The specific requirements for establishing an NRC official presence using third party social media services/sites spans five primary functional areas:

- Information Dissemination (public information/content)
- Information Collection (in the form of comments and ideas submitted by the public as part of a public dialog)
- Applying NRC Branding to Social Media Tools and Services
- New Information Distribution Channels
- Administrative Requirements

Within each of these functional areas, the NRC also requires a number of service characteristics for each functional requirement. The primary required service characteristics include:

- Increased speed of distribution of agency content
- Enhanced access to agency content through multiple channels
- Enhanced interaction with agency stakeholders
- Increased scale and reach across all potential stakeholders

The combination of the NRC's functional requirements and the required service characteristics represent the primary requirements for the use of third party social media services to meet the NRC's needs.

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2 Strategic Plan: Fiscal Years 2008–2013 (NUREG-1614, Volume 4) http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1614/v4/sr1614v4.pdf
3 OMB's Memorandum M-10-06, Open Government Directive, available at http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-06.pdf.
4 NRC's Open Government Plan, available at http://www.nrc.gov/public-involve/open/philosophy/nrc-open-gov-plan.pdf.

3.   **What legal authority authorizes and defines the collection of information by this project?**

Both the President's Transparency and Open Government Memorandum[5] dated January 21, 2009, and the OMB Open Government Directive Memorandum dated December 8, 2009, direct Federal departments and agencies to harness new technologies to engage the public and serve as one of the primary authorities motivating the NRC's efforts to utilize social media websites and applications.

Authorities that impact the NRC's use of social media websites and applications include:

5 U.S.C. § 301;

5 U.S.C. § 552a, Privacy Act of 1974, as amended;

44 U.S.C. § 31, Federal Records Act;

44 U.S.C. § 3501, Paperwork Reduction Act of 1995

Section 208 of the E-Government Act of 2002;

The President's *Memorandum on Transparency and Open Government*, January 21, 2009;

The OMB Director's *Open Government Directive* Memorandum, December 8, 2009;

OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications (*June 25, 2010)[6]; and

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)[7].

4.   **Points of Contact:**

Project Manager	Office/Division/Branch	Telephone
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Business Project Manager	**Office/Division/Branch**	**Telephone**

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5 President Barack Obama, Memorandum on Transparency and Open Government, available at http://www.gpoaccess.gov/presdocs/2009/DCPD200900010.pdf.
6 OMB Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, available at http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-23.pdf
7 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, available at http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA_Gen_ICRs_5-28-2010.pdf.

Holly Harrington	OPA	301-415-8203
Technical Project Manager	**Office/Division/Branch**	**Telephone**
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Executive Sponsor	**Office/Division/Branch**	**Telephone**
Eliot Brenner	Director, OPA	301-415-8200

5. **Does this Privacy Impact Assessment (PIA) support a proposed new system/project or a proposed modification to an existing system/project?**

   a. ___ New ___X___ Modify Existing ___ Other (Explain)

   Flickr.com (via GSA) is being added to the Appendix A listing of NRC official presence use of social media interactions and applications that follow the requirements and analytical understanding outlined in this PIA.

   Original PIA maintained in ADAMS at ML103410478 and approved 12/14/2010. Update to original PIA maintained in ADAMS at ML11159A004 and approved 6/22/2011.

B. **INFORMATION COLLECTED AND MAINTAINED**

   1. **INFORMATION ABOUT INDIVIDUALS**

      a. **Will this project collect information about individuals?**

      Generally, social media websites and applications are privately owned by third parties. These social media websites and applications continue to grow in size and diversity. Because of the depth and diversity of this reach, the NRC is planning for the potential use of a diverse set of third party social media services to achieve mission and Open Government objects.

      The need for a user to create a site user account depends on the particular third party social media service/site. Some third party services/sites will not require a site visitor to create an account or provide profile information. For example, WordPress (for blogging and discussions) does not require site visitors to provide information about themselves to review a post or submit a comment (this can be submitted anonymously).

      Social media sites often provide the ability for members of the public to set up their own personal accounts and profiles on the third party service/site. These sites have their own privacy policies which site users must agree to in order to create an account. Most sites allow site visitors to decide how much information they want to capture about themselves and also to establish rules for whether all or part of their information is made public and to whom (e.g. only to those they have accepted as "friends" or to anyone with access to the service/site).

Each third party social media service/site provides its own privacy policy, and while users may be required to submit some personally identifiable information (PII) during the account registration/profile process, the NRC will not solicit or collect this PII. If PII is posted by the individual on the social media website or application or sent to the NRC in connection with the transaction of public business, it may be a Federal record and if so, the NRC is required to maintain a copy per the appropriate records management policies.

See Appendix A for referenced privacy policies, information required for account creation, and other details for specifically referenced sites.

(1) What group of individuals (e.g., Federal employees, Federal contractors, licensees, general public) and what type of information?

If profile data is provided by individuals, then it may include information regarding:

a. General public visiting the web site to view and submit comments, ideas, etc. Members of the public may create their personal accounts with the third party services and voluntarily share information from their profiles such as name and email address when submitting comments, ideas, etc.

b. NRC Federal employee's account information who are assigned to moderate submitted postings. This information will contain their name, NRC email address, position title, and relevant NRC position-specific information to engage in dialog with the public.

c. NRC Federal employees and Federal contractors who are assigned to administrate the NRC page and account. This information would include NRC work related information necessary to create their user account information.

Each third party social media service/site provides its own privacy policy, and while users may be required to submit some PII during the account registration process, the NRC will not solicit or collect this PII. If PII is posted on the social media website or application or sent to the NRC in connection with the transaction of public business, it may be a Federal record and if so the agency is required to maintain a copy per the appropriate records management policies.

2. INFORMATION <u>NOT</u> ABOUT INDIVIDUALS

a. What type of information will be maintained (describe in detail)?

These services will be used to post and share public information content on topics of interest to educate, inform, and communicate with the public about NRC activities. Information content can include information already available on the public website. If permitted, comments and ideas can be shared by members of the public related to information posted by the NRC. Information posted on the social media website or application or sent to the NRC in connection with the transaction of public business may be a Federal record, and if so, the NRC is required to maintain a copy per the appropriate records management policies.

See Appendix A for referenced privacy policies, information required for account creation, and other details for specifically referenced sites.

b.   What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

NRC offices and staff create content for posting. This can be content that exists on the public website or new content created to engage visitors.

Site visitors are members of the general public. Specific services (listed in Appendix A) give site visitors the option to submit comments and ideas related to content that has been posted by the NRC. NRC moderators will review comments and ideas that are submitted by the public for posting. Moderators will also approve all content postings of publicly available information by NRC staff.

c.   What is the purpose for collecting this information?

The third party social media service/sites will provide the agency with the ability to engage in public dialogue, communicate and educate the public about the NRC and mission activities, and collaborate with the public and stakeholder groups.

C.   <u>USES OF SYSTEM AND INFORMATION</u>
(These questions will identify the use of the information and the accuracy of the data being used.)

1.   Describe all uses made of the information.

The information communicated and collected is considered public information and is used to inform and educate the public about the NRC and its mission activities, reach a wider public audience, and allow for a dialogue between the public, stakeholders, and the NRC. These third party social media services/sites provide another communication channel for the NRC to communicate with the public about its regulatory mission. Specific social media services allow the public to contribute their opinions and ideas related to the agency's business activities. Public comments and information posted by members of the public will be shared with appropriate NRC offices where applicable. See Appendix A for referenced privacy policies, which services are to permit the posting of

comments, information required for account creation, and other details for specifically referenced sites.

2. **Is the use of the information both relevant and necessary for the purpose for which the project is designed?**

Yes

3. **Who will ensure the proper use of the information?**

The NRC's Office of Public Affairs (OPA) will oversee and administer the third party social media services/sites used to establish an NRC official presence. OPA will work with the NRC program offices to publish relevant and accurate information, respond to public comments and ideas, and to ensure proper use of information exchanged through these third party social media channels.

4. **Are the data elements described in detail and documented?**

Yes. See Appendix A for information related to specifically referenced sites.

5. **How will the information from this project be *retrieved* (be specific)?**

Depending on the specific third party social media service/site, visitors to the site may be able to view all posted information and comments submitted on the site (if applicable). This information will be publicly available. The NRC's OPA moderator(s) and Office of Information Services (OIS) administrator(s) can also view the information directly on the web site as well as retrieve the information via methods such as file exports, depending on the site capabilities.

If PII is collected on a social networking or social media site or sent to the NRC in connection with the transaction of public business, it will not be retrieved by personal identifier.

6. **Will this project provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?**

No

7. **Describe the report(s) that NRC may produced from this system.**

Reporting capabilities are heavily dependent on the specific third party social media services/sites being used. Reports are potentially viewable on-line by the OPA moderators and OIS administrators only. These reports can be exported to downloadable files. The data in these reports may include statistical information about the activities performed on the site, blog comments, and other voluntary information provided by the visitor (their email address or name).

a. **What are the reports used for?**

To provide administrative and performance metrics on the site activity or postings submitted by visitors of the third party social media service/site, including a data export of all comments (if applicable) or postings for record requirements.

b.   Who has access to these reports?

Only limited OPA moderators and OIS administrators will have access to these reports.

D.   RECORDS RETENTION AND DISPOSAL
*(This question is intended to establish whether the information, data, or records contained in this system has an approved records retention schedule. (*Reference NUREG-0910*, NRC Comprehensive Records Disposition Schedule.)*

1.   Has a retention schedule (either under the General Records Schedule or NRC-specific) been approved by the National Archives and Records Administration (NARA)?

No.

2.   If you answered "No" to question D.1, complete the following section.

a.   Does the information in the system:

Have historical value?	<u>YES</u>	NO
Document NRC business decisions?	YES	<u>NO</u>
Contain data used to make a judgment or conclusion?	YES	<u>NO</u>
Provide statute or required regulatory information?	YES	<u>NO</u>

b.   What is the value of the information to your organization and the Agency?

The social media services support the Agency's long-standing commitment to transparency, participation, and collaboration in its regulatory activities by engaging the public in dialogue, sharing information, and collaborating on topics of Agency and public interest regarding strong, fair regulation of the nuclear industry. The Agency's use of social media services sites is in compliance with the President's Memorandum on Transparency and Open Government (January 21, 2009) and the Director of the Office of Management and Budget's (OMB) Open Government Directive Memorandum (December 8, 2009). The NRC plans to leverage third party social media services/sites to expand public outreach, communication, and foster engagement using these new media channels. The NRC may use selected popular non-government third party social media services/websites to expand its reach to new

communities and stakeholder groups. Based on the diversity of information collected from the public, the value of this information will vary.

(1) When will it no longer be needed?

All public information and comment postings (if applicable) will be maintained on the social media site until site activity and business needs for the particular topic has ceased. Content and comments (if applicable) will be exported and copied to the Agencywide Documents Access and Management System (ADAMS) in an acceptable recordkeeping format every 60 days. All postings will be placed in an appropriate records series and appropriate retentions applied.

Content uploaded to services that do not offer an export function will be stored in ADAMS or an appropriate and approved NRC record repository prior to hosting the content on the social media service.

c. How will information, no longer required for current business operations, be maintained?

The information will be exported as a file in ADAMS in compliance with submitted guidance and recordkeeping requirements and placed into appropriate records series to which associated retentions can be applied.

In certain cases, information hosted by a social media platform will not be original content, but instead will be used to distribute previously-existing content into a social network. If content is not original but instead references information hosted through a previously-existing NRC service, that information will be maintained in ADAMS through the existing procedures for that specific service/site.

(1) Will it be separated from currently active information?

Yes. (See explanations in 2.b.(1) and c).

d. Does this electronic information replace an existing paper-based or electric information file system?

No. This system offers another method for obtaining information electronically.

E. ACCESS TO DATA

1. **INTERNAL ACCESS**

a.   **What NRC offices will have access to the information and for what purpose?**

OPA moderator(s) will be able to review and approve all posted content, which will be publicly available information on the social media service/site. OIS administrators will be able to view all information collected on-line, as well. All NRC employees will be able to see the posted information and comment on it (if applicable).

OPA moderator(s) will review submitted content prior to publishing them on the social media service. The OIS administrator(s) will access the information to support OPA's business activities and adjust the look and feel of the site (as directed by OPA).

Administrator/moderator access will be limited to OPA and designated OIS personnel. Content that is posted to these sites will be publically available on the Internet. OPA moderator(s) and OIS administrator(s) will administer the agency's accounts.

b.   **How will information be transmitted or disclosed?**

In most cases, information (e.g. comments, ideas, etc.) is accessible directly from a web browser. When the OPA/OIS Administrator or Moderator is logged in, their information will be transmitted to the browsers securely and encrypted over a Hypertext Transfer Protocol Secure (HTTPS) protocol.

c.   **What controls will prevent the misuse (e.g., unauthorized browsing) of information by those having access?**

Information posted on these third party social media services/sites is considered to be public by its very nature. Also, access to public information is not limited by the NRC or the third party social media service/site. Administrator/moderator information is protected by the social media site by requiring administrators and moderators to securely login using encrypted sessions (HTTPS) to access and administer the NRC's official presence on site.

d.   **Are criteria, procedures, controls, and responsibilities regarding access documented?**

Yes. OPA, in collaboration with OIS, will document administration and moderation procedures, controls and responsibilities.

The NRC Interim Guidance on the Use of Social Media, issued January 5, 2011 (ADAMS accession #ML103060402), outlines who may or may not sign up to create an NRC official presence or account on a third party social media service/site.

2. **EXTERNAL ACCESS**

    a. **Will external agencies/organizations/public share or have access to the information?**

The NRC does not own or control social media websites and applications, and accesses them only as a user. The public will have access to content posted and published by NRC staff to the third party social media website/service. In addition, the public will have access to submit comments or questions about the posted content using the comment capabilities provided by the third party social public media service/site.

Information managed by NRC administrators and moderators will be restricted to designated NRC personnel. Passwords for accounts will be controlled by the NRC's OPA and will ensure that only authorized individuals have access to the accounts. The OPA must set-up an official account which clearly establishes that the account is managed by NRC.

    b. **What information will be shared/disclosed and for what purpose?**

Public communication such as informational posts on topics of relative interest to NRC business activities, photos, videos, etc. will be made available by OPA (or approved subject matter experts) to increase outreach, inform the public and stakeholders, and create a dialog between the public and the NRC. OPA will work with NRC program offices to identify topics of interest for creating public posts. This information is similar in nature to information found on the NRC public web site. Use of third party social media service/sites will enable the NRC to reach wider audiences and (for specific social media sites) enable interactive dialogue on topics of public interest.

F.   **TECHNICAL ACCESS AND SECURITY**

1.   **Describe security controls used to limit access (e.g., passwords). Explain.**

Each third party social media service/site used to create an NRC official presence will provide capabilities to create administrator and/or moderator accounts to allow NRC staff in OPA, and designated staff in NRC offices, to manage site content and respond to public comments. Login and privileged activity will be conducted over secure sessions using HTTPS. The Social Media Interim Guidance describes relevant security requirements for NRC staff that will create and manage NRC official accounts.

OPA moderators and OIS administrators can only perform their assigned functions after access authentication with their login ID and password

credentials. Viewing of public information posted will not require access authentication.

Contractors may provide support for the NRC's use of social media websites and applications. Contractor access will be authorized based on the roles and responsibilities required by the contract.

2.   Will access or operation be available from more than one location (site)?

Yes. The social media site/application is designed to be accessed by anyone from anywhere. Information content managed by the third party social media service consists of non-sensitive public information and is considered public information.

OPA and designated office representatives (which may include authorized contractors) may contribute to and post information under the guidance of OPA. These individuals could be located in different NRC Regional Offices as well as the NRC Headquarters. Information will be managed using the capabilities provided by the third party social media service/site.

3.   Which user groups (e.g., system administrators, project manager, etc.) have access?

OPA moderators and designated NRC staff will have access to all public comments that are posted to the NRC official presence social media sites.

OIS administrators will support the needs of OPA and have administrator rights for the specific social media site to support changes to the look and feel of the site, manage moderator accounts, as well as other administrator activities as needed and directed by OPA.

In addition, employees of third party social media websites and services designated as Administrators have access to their own systems. These Administrators typically use this access to assist with technical issues. The ability of employees of third party sites to access client information is managed by the respective company's terms of service or privacy policy.

4.   Will a record of the user group(s) access to the system be captured?

This is dependent on the specific social media site. Third party social media services/sites will normally capture the following information:

- A record of site visitor comments submitted with a date/time
- Administrator activity.
- Moderator activity.

5.   What auditing measures and technical safeguards are in place to prevent misuse of data?

The content and dialog posted on the social media service will be in the public domain. Information that is misstated or misused should be reported to OPA, who will follow up with the NRC program offices, as appropriate. Most third party social media services/sites provide auditing capabilities for content that is published and comments that are posted by visitors.

Content information to be maintained by the NRC will be added to ADAMS, which has technical safeguards in place to prevent misuse of data.

6.   Are the data secured in accordance with FISMA requirements?

There are two places where the information will be maintained.

- Third party social media services/sites. These are not controlled by the NRC. Security controls are implemented by these providers and some have third party certifications. Whenever possible, to meet business requirements, the NRC will leverage third party social media services that are sponsored by the General Services Administration (GSA). GSA is also in the process of standing up a secure cloud service for selected third party social media services. NRC will leverage available services through GSA in order to take advantage of GSA provided terms of service and enhanced security features.
- ADAMS. This system is operated in accordance with FISMA requirements.

Content that is to be published in the public internet domain will be reviewed by the information owner and/or OPA to ensure it is suitable and appropriate for public consumption. This will be analogous to what occurs for publishing information to the NRC public website and public ADAMS. Visitors will be referred to a comment policy on the NRC website that indicates they should submit comments that conform to ethical standards and should be suitable for general public consumption. OPA at their discretion, as moderators, may choose not to publish comments that violate the comment policy.

OPA administrators and moderators, as well as other designated NRC staff moderators, will adhere to standard security rules for establishing account logins and profiles. This information is included in the Social Media Interim Guidance.

Social media websites and applications are external and third party hosted. Therefore, no internal system security plan is currently required. Users should also consult the website security policies of social media websites and applications they subscribe to for more information as they apply.

Appendix A

Social media interactions and applications covered by this privacy impact assessment include:

- Blogging Tool – GSA's WordPress

- Micro-blogging Tool, such as Twitter.com (via GSA)

- Video Channel, such as YouTube.com (via GSA)

- Photo Gallery, such as Flickr.com (via GSA)

Future areas will be added as the need for additional NRC official presence sites are further established. To support the expansion of the Open Governance capabilities, to increase collaboration, transparency, and participation in the NRC regulatory activities, it is expected that multiple solutions will be leveraged by the NRC. This envisioned approach is consistent with the desire to increase NRC's communication channels in support of various business and Open Government needs.

Purpose	Blogging Tool
Site	WordPress.com (via GSA)
Privacy Policy	http://automattic.com/privacy/
Registration Requirements (required for NRC administrator and moderator managing the NRC public blogs)	- Account profile information (name, title, and other information adequate to represent the NRC authorized representatives to the public) - Username – for account - Password – for account - E-mail Address – NRC email address of the NRC representative
Other Information	WordPress will be used by OPA or a designated office representative to publish content that is publically available on topics of interest for the purpose of informing the public and generating conversation/dialog with the public. Visitors will have the option to post comments and optionally provide their name and email address as part of the dialog. This information will not be solicited by the NRC. Visitors may also choose to submit comments anonymously. A comment policy will be posted and available to visitors to establish expectations and guidelines on comments submitted and their use by the NRC. WordPress uses cookies to help identify and track visitors, their usage of the website, and their website access preferences. WordPress visitors have the option to refuse cookies before using WordPress, with the drawback that certain features of WordPress may not function properly. WordPress will not share cookie information with the NRC and NRC will not solicit this information.

Visitors	Visitors may post a comment anonymously or voluntarily provide their name (or alias) and an email address. Names and email addresses are often provided by these services to establish a conversation on the web between the NRC blogger and public site visitors.

Purpose	Video Channel
Site	YouTube.com (via GSA)
Privacy Policy	http://www.youtube.com/t/privacy
Registration Requirements (required for NRC administrator and moderator managing the NRC Video Channel)	- E-mail Address – NRC email address of the NRC representative - Username - Publicly-displayed username for the account. - Password – for account - Location (Country) - for account - Postal Code - for account
Other Information	YouTube will be used by OPA or a designated office representative to publish videos that are publically available on topics for the purpose of informing and educating the public as well as generating conversation/dialog with the public. Visitors will NOT have the option to post comments about the videos. YouTube registration requires an email address and password. This information will not be collected by NRC.
Visitors	For some activities on YouTube, like posting comments, flagging videos, or watching restricted videos, visitors will need to establish a YouTube or Google Account. Some personal information is required to create an account, including an email address and a password. This information is used to protect the visitors' account from unauthorized access. No account information is needed for viewing videos.

Purpose	Micro-blogging Tool
Site	Twitter.com
Privacy Policy	http://twitter.com/privacy
Registration Requirements (required for NRC administrator and moderator managing the NRC Twitter feed)	- Account profile information (name, title, and other information adequate to represent the NRC authorized representatives to the public) - Username – for account - Password – for account - E-mail Address – NRC email address of the NRC representative

Other Information	Twitter will be used by OPA or a designated office representative to publish snippets of content for the purpose of generating conversation/dialog with the public or providing information to the public. Visitors will have the option to flag as favorite, retweet, or reply in response to the agency's twitter posts. In order to retweet or reply, visitors will be asked to register on the Twitter site. Registration requires the user to enter their name, email address, username, and password. This information will not be collected by NRC. A policy will be posted and Made available to visitors to establish expectations on replies submitted and their use by the NRC.
Visitors	In order to retweets or reply to the tweets posted by OPA or NRC authorized representatives, visitors must sign up for a Twitter account. Along with any comments/tweets posted on the site, Twitter publishes the individual's name and username.

Purpose	Photo Gallery
Site	Flickr.com (via GSA)
Privacy Policy	http://info.yahoo.com/privacy/us/yahoo/flickr/details.html
Registration Requirements (required for NRC administrator and moderator managing the NRC Photo Gallery)	• Account profile information (name (first and last), gender, birthday, country, postal code) • Username – for account • Password – for account • E-mail Address – NRC email address of the NRC representative
Other Information	Flickr will be used by OPA or a designated office representative to publish photos in order to raise awareness of the agency's current activities, enhance information about existing collections of visual content such as historic photos, and allow the public to easily browse, view, and download content. Visitors will NOT have the option to post comments. Other content may be viewable to the public at large. Flickr registration requires an email address and password. This information will not be collected by NRC.
Visitors	Visitors may view photos or content on Flickr without having an account. However, in order to add a photo to a user's "Favorites", they must have a Flickr account. Some personal information is required to create an account, including an email address and a password. This information is used to protect the visitors' account from unauthorized access. No account information will be collected by NRC.

PRIVACY IMPACT ASSESSMENT REVIEW AND APPROVAL

System Name: Official Presence Use of Social Media Platforms

Submitting Office: Office of Public Affairs

A.   PRIVACY ACT APPLICABILITY REVIEW

The social media websites and applications covered by this privacy impact assessment (PIA) may require users to submit some personally identifiable information (PII) during the registration process when an account is required by the third party social media service. As a result, PII may transit and be displayed during the sign-up/long-on transaction and subsequent interactions. The NRC will not solicit or collect this PII.

When NRC uses the social media websites and applications listed in Appendix A, NRC will not: 1) actively seek PII, and may only use the minimum amount of PII, which it receives, to accomplish a purpose required by statute, executive order, or regulation (all other PII received will be managed in accordance with the requirements and analytical understanding outlined in this PIA); 2) search social media websites or applications for or by PII; and 3) "friend" public users proactively.

When NRC uses the social media websites and applications listed in Appendix A, NRC may: 1) establish user names and passwords to form profiles, so long as they are easily identifiable as NRC accounts; and 2) interact on social media websites or applications on official NRC business.

As a requirement of this PIA, PII may not be retrieved by personal identifier, thus, a Privacy Act System of Records Notice is not required.

Unless otherwise directed by statute, executive order, or regulation the NRC's Office of Public Affairs (OPA) will serve as the primary account holder for all NRC official presence social media websites and applications and will manage and approve all NRC content posted on these public-facing networks. All content disseminated through official NRC accounts must be approved by OPA (or, by agreement with OPA, by authorized NRC employees in each office) prior to posting. OPA (or authorized NRC employees) will ensure that all posted content falls within the appropriate requirements for publicly available information and materials. OPA will, when necessary, act as the final authority on what content is acceptable for posting.

If NRC posts a link that leads to a social media application or website, the NRC will provide an alert to the visitor, such as a statement adjacent to the link or a "pop-up," explaining that visitors are being directed to a nongovernment website that may have different privacy policies from those of the NRC's official website.

If NRC has an operational need to use social media interactions or applications that are outside the scope of the requirements and analytical understanding outlined in this PIA, a separate PIA must be written to address the specific privacy concerns that may be unique to that initiative.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Act Program Analyst	November 3, 2011

B.   INFORMATION COLLECTION APPLICABILITY DETERMINATION

The NRC uses of social media outlined in this PIA do not require an OMB clearance. Certain uses of social media websites and applications are exempt from the Paperwork Reduction Act (PRA). For example, the NRC may use web-based technologies, such as blogs, wikis, and social networks, as a means of publishing general solicitations for public comment and for conducting virtual public meetings. Items collected by social media websites and applications that are not collecting information on behalf of the federal government are not subject to the PRA. Additionally, if the NRC authorizes website users to share content, such as "send to a friend" using a web form, this authorization does not require OMB clearance unless the agency collects additional information from the "friend."

However, if the NRC uses social media websites and applications to post surveys of any kind, including web polls and satisfaction surveys that pose identical, specific questions, (including pop-up windows), the PRA does apply. Requesting information from respondents' beyond name and email or mailing address would require OMB approval because it seeks information beyond what is "necessary" for self-identification during account registration of the respondent.

The PRA applies whether the obligation to respond to a collection of information is mandatory, voluntary, or required to obtain a benefit.

Reviewer's Name	Title	Date
Tremaine Donnell	Information Collections Team Leader	November 14, 2011

C.   RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

The NRC uses of social media as outlined in this PIA will require further consult with the OPA to assure that content is either uploaded to ADAMS as an agency record prior to posting on a hosted site, or exported (or copied) to ADAMS at an agreed upon time. In both of these cases, the records must be profiled in a manner that retentions can be applied. Records retentions do not currently exist for either of these scenarios; therefore, records filed in ADAMS will be considered permanent until a NARA approved retention is obtained.

The NRC's Records and Archives Services Section will need to work with OPA, as well as with the NARA, to determine a records retention and disposition schedule for records created and maintained with social media tools. Implementation of retention schedules is mandatory under 44 U.S.C. 3303a(d) and although this does not prevent further development of this project, retention functionality, or a manual process, must be incorporated to meet this requirement.

Reviewer's Name	Title	Date
Mary Haynes	Records Management Analyst	November 14, 2011

D.   APPROVING OFFICIAL REVIEW AND CONCURRENCE

I concur in the Privacy Act, Information Collections, and Records Management reviews:

/RA Anna T. McGowan for/   *11/15/2011*

                                       Date: _____

Russell A. Nichols, Chief
Information Services Branch
Information and Records Services Division
Office of Information Services

TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS

To: **Eliot Brenner, Director, Office of Public Affairs**	

Name of Project: **Official Presence Use of Social Media Platforms**	

Date IRSD received PIA for review: **November 3, 2011**	Date IRSD completed PIA review: **November 15, 2011**

Noted Issues:

Based on the social media interactions and applications that follow the requirements and analytical understanding outlined in this PIA:

- No PII will be solicited or collected.
- Privacy Act System of Records Notice is not required.
- No OMB clearance is needed.

Until a records schedule is approved by NARA and recordkeeping requirements defined for each tool and scenario, any information content meeting the definition of a record will be maintained indefinitely.

Russell A. Nichols, Chief Information Services Branch Information and Records Services Division Office of Information Services	Signature/Date: */RA Anna T. McGowan for/* *11/15/2011*

Copies of this PIA will be provided to:

James C. Corbett, Director
Business Process Improvement and Applications Division
Office of Information Services

Paul Ricketts
Senior IT Security Officer (SITSO)
FISMA Compliance and Oversight Team
Computer Security Office