IRS Recruitment Facebook Page – Privacy Impact Assessment

PIA Approval Date – Aug. 11, 2011

Overview:

The purpose of the IRS Recruitment page on Facebook is to provide the IRS Recruitment Office with branding and advertising access to more than 300 million Facebook users, and to provide a platform to answer questions about the IRS recruitment, assessment, selection and hiring processes. Branding and advertising activities include: drive web traffic to the IRS careers website and to USAJOBS, encourage fans to share information on IRS recruitment opportunities, use keywords that maximize search engine optimization (SEO), reinforce the IRS employer brand identity. Answering general questions include: IRS career and job opportunities, basic qualifications, job application process, assessment process, selection process and hiring process. IRS postings are in English and all postings by fans are in their language of choice. Facebook titles and navigation are presented in the language selected by the user and translation tools are available on Facebook to translate postings.

Systems of Records Notice (SORN):

IRS 00.001--Communications

Purpose of Facebook page

The IRS Recruitment Office was established by the initial Workforce of Tomorrow, and has sole responsibility for outreach and branding for IRS recruitment activities. While most people are familiar with Facebook as a social utility, the site is steadily growing as a valuable tool for businesses to establish a presence, communicate key information and connect to stakeholders. On Facebook, the IRS Recruitment Office will leverage 1) Group discussions 2) Wall posts, 3) videos and 4) notes applications to meet business objectives. A Facebook presence using interactive tools will allow the IRS Recruitment Office to meet the following business objectives:

- Stakeholder Identification and Outreach A presence on Facebook allows IRS to target job
 seekers and others interested in exploring career opportunities at the IRS, thus allowing the
 agency to reach a wider audience at significantly lower costs than traditional media. The IRS
 Recruitment Office can promote key hiring initiatives to a targeted audience using advertising,
 discussions and interactive content.
- Customer Engagement Using Facebook applications can help the IRS Recruitment Office communicate recruitment requirements, processes, events and other related information.
- Feedback Mechanism Facebook offers two–way communication through comments to wall
 posts, discussions and other applications, giving the IRS Recruitment Office the opportunity to
 gauge audience sentiment and obtain specific concerns of community. This allows the IRS
 Recruitment Office to determine areas of improvement for recruitment outreach, and offers an
 opportunity to provide clarity directly to the audience when needed. **Please note: The
 Facebook page will carry a notice instructing users to not post or share any SBU or PII.
- Drive Web Traffic The Facebook page will complement http://jobs.IRS.gov, the official source of information on IRS jobs and careers. The Facebook page will act as a portal for driving traffic to http://jobs.IRS.gov and other official IRS internet presences.
- Viral Marketing Facebook provides the opportunity for users to further distribute IRS
 Recruitment Office messages, creating exponential growth in the message's visibility and
 impact, thus causing a viral effect.
- ROI Measurement Using Facebook analytic tools can help the IRS Recruitment Office understand return preparer behavior based on the viewing, sharing of content and commentary

on the social networking site. In concert with metric tools used on IRS.gov, the IRS Recruitment Office can determine if messaging and efforts have effectively yielded a call to action by looking at traffic from Facebook to http://jobs.IRS.gov, and vice—versa.

Contractual Agreement

GSA has arranged for many government agencies to enter into agreements with Facebook at the Departmental level. Our effort will come under the signed agreement that Treasury has with Facebook Inc. That agreement covers issues such as:

- Indemnity in which there is no longer an indemnification clause in the agreement, and liability is limited and covered by federal law.
- Governing Law; Venue and Jurisdiction meaning the agreement is governed by the laws of the United States. In absence of federal law, the laws of the state of California will apply.
- Advertising You must submit a written request to Facebook to block the display of any
 commercial advertisements, solicitations or links on the Government Entity's page, Facebook
 may agree to so if the blocking technology is available for said pages.
- Free Service Facebook will not charge federal account holders for the use of Facebook, except liabilities incurred for breaking Terms of Use.

Content Criteria

The primary purpose of the IRS Recruitment Facebook page is recruitment outreach. The IRS Recruitment Office will post content promoting current vacancies, careers within IRS, and content that supports the various value propositions associated with target audiences. All IRS content will be created, approved and deployed by project managers in the IRS Recruiting Office. Other IRS Recruitment Office/IRS employees will not be permitted to post official IRS content to the Facebook page. Questions posted by fans will only be answered with general information from existing published sources. All responses that contain, allude to, or create PII will be performed thru IRS email from the IRS Recruitment Office. Users will be reminded to not post any PII in questions or comments; any PII posted by fans will be immediately removed from the site once identified by the IRS Recruitment Office analyst.

Data in the Website

1. List all PII that is likely to become available to the IRS through public use of the third-party website or application.

- All Facebook members may elect (but not required) to furnish the following types of PII:
 - Picture (themselves, or someone else)
 - Birthday
 - Employer
 - o Education
 - Relationship status
 - Contact information
 - E-mail address
 - Phone numbers
 - Address, city and town
 - Information on activities and interests

Friends may be viewable to other Friends including all PII they provided about themselves on their Facebook page, depending on how each user sets up their Facebook account.

- 2. What is the IRS intended or expected use of the PII? Be specific. This answer must map to the mission or goals of the agency.
 - A. Will the site be used to solicit feedback? (OMB M-10-23 requires that if an agency uses a third-party service to solicit feedback, the agency should provide an alternative government email address where users can also send feedback).

Yes. Our intent is to engage with jobs seekers and those interested in exploring IRS career opportunities and allow them to comment with relevant questions and feedback. An alternative e-mail address is available.

- B. If the answer for 2a. above is yes provide information on the IRS.gov website or email addresses where users can send feedback:
 - www.jobs.irs.gov
 - eric.erickson@irs.gov
 - www.twitter.com/jobdog59
 - www.twitter.com/RecruitmentIRS
 - www.twitter.com/IRSCareers

Unique personnel contact information available in job announcements posted on www.USAJOBS.gov

3. With whom will the IRS share the PII?

No. It is not our intent to collect or share PII on any member of the public who visits or uses the IRS Recruitment Facebook page. It is our policy to delete any comments that contain PII information.

4. What are the plans to maintain the PII information collected, used or stored?

The IRS Recruitment Office will not solicit, accept or maintain any PII on the IRS Recruitment page other than the Facebook user name of persons who post comments to the page. Any comments containing PII other than Facebook user name are removed from the page and the user is directed to contact the IRS Recruitment Office through secure email. Content on the Recruitment Facebook page is non–recordkeeping and does not require National Archives disposition approval. Please note: For future updates to the Facebook page, any records identified as unscheduled and/or added to this Facebook page for Departmental business may need to be scheduled in coordination with the IRS Records and Information Management (RIM) Program Office.

- A. What is the planned retention period for the PII information?

 None
- B. Cite the authority to retain the PII data.

No PII data will be retained

- C. Describe where the PII data will be stored, who will have access to it, and the purpose.

 No PII data will be stored
- **D.** How will the PII be eliminated at the end of the retention period? No retention period, as no PII data will be stored
- 5. How will the IRS secure the PII that is used, maintained or provided? Be specific to ensure the security controls meet Cybersecurity and other Federal security authorities.

All Facebook sites are public, including those maintained by government agencies. Facebook users choose to take part in discussions and freely provide information. The IRS Recruitment Office will use periodic message posts to notify public users that they must not provide identifying information about anyone else other than themselves, and the consequences if they do so.

6. List any other privacy risks that may exist, or be inherent in a social networking environment.

Facebook users may inadvertently post PII in a comment.

A. What is the IRS plans to mitigate those risks?

Any comments containing PII other than Facebook user name are immediately removed from the page and the user is directed to contact the IRS Recruitment Office through secure email.

7. Does this website use any means to track visitors' activity on the Internet?

Access to the Data

8. Third-Party Privacy Polices

- A. The IRS business owner has examined the third party's privacy policy and has evaluated the risks and has determined whether the website or application is appropriate for the IRS use. Yes
- B. The IRS business owner will monitor any changes to the third party's privacy policy and periodically reassess the risks involved. Yes

9. External Links

The IRS business owner will assure that if they posts a link that leads to a third–party website or any other location that is not part of an official government domain, the agency 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 another government website that may have different privacy policies from those of the agency's official website. Yes

10. Applications

If the IRS business owner incorporates or embeds a third–party application on its website or any other official government domain, the IRS business owner will take the necessary steps to disclose the third party's involvement and describe the IRS privacy requirements in its Privacy Policy notice, as specified by OMB M–10–23. Yes

11. Agency Branding

The IRS business owner will follow guidance that suggests that when an agency uses a third–party website or application that is not a part of an official government domain, the IRS will apply appropriate branding to distinguish the agency's activities from those of nongovernmental actors. For example, to the extent practicable, the IRS business owner will assure that the IRS Seal or emblem will be added to its profile page on a social media website to indicate that it is an official IRS agency presence. Yes

12. Information Collection

If information is collected through the IRS use of a third–party website or application, the IRS business owner will assure that they collect only the information "necessary for the proper performance of agency functions and which has practical utility." If personally identifiable information (PII) is collected, the agency will collect only the minimum necessary to accomplish a purpose required by statute, regulations, or executive order. Yes.