



**Greetings! We hope your new year is off to a great start. As you continue to work within your IC to promote our mission, we wanted to provide a few tips on how to enjoy social networking without causing the NIH to be vulnerable to privacy risks.**

## **Smart Social Networking**

While the NIH is encouraged to use new technology platforms to increase collaboration, participation and transparency amongst its stakeholders and the public, NIH employees and contractors must ensure that we continue to comply with Government requirements that apply to social media. New social media requirements highlighted in OMB Memo 10-23 focus on “third-party websites or applications (TPWAs).” TPWAs refer to web based technologies that are not exclusively operated or controlled by NIH, but can be embedded or incorporated on our websites and involve significant participation of a nongovernment entity (e.g., Twitter, Facebook, YouTube links, blogs, email subscription services, mobile applications, etc.).



Please keep in mind these tips when considering any new or existing use by the NIH of TPWAs:

- Examine the TPWA's privacy policy. Is the website or application appropriate for NIH use? If you do not know, please contact your IC Privacy Coordinator, ISSO, Communications Director, or us;
- If a TPWA may be used to capture information on individuals (i.e., email, name, open comment fields that could be populated with personal information, etc.), confirm that any information being collected is related to NIH's mission or goals or that information collected is required/authorized by law. Also, obtain clearance under the Paperwork Reduction Act, as applicable;
- Ensure the IC website privacy policy explicitly discloses how NIH is using the TPWA. If PII will be collected by the TPWA, the site's privacy policy should also explain who will have access to the PII, how it will be used, stored, or retained;
- Ensure opt-in/opt-out mechanisms are accessible, understandable, and implemented uniformly across websites;
- Ensure public users are provided an alternative for acquiring comparable information and services;
- If website visitors are redirected to a TPWA, give notice with access to an applicable privacy policy through an alert (e.g., “pop-up” or statement adjacent to the link), where the public might make PII available (e.g., submit comment, link, post, join a group, “friend,” “like,” “follow,” etc.);
- Use appropriate NIH logos to distinguish between Government and non-Government sites;
- Conduct a Privacy Impact Assessment (PIA) for each use of a third-party website and/or application (e.g., MySpace, Flickr, LinkedIn, Survey Monkey, etc.);
- The General Services Administration has negotiated federally-compatible Terms of Service (TOS) Agreements for a lot of TPWAs. However, being named on the GSA list is not in itself sufficient to authorize use. To authorize use of a TPWA based on federally-compatible TOS, the TOS must be signed by the appropriate department (HHS) or agency (NIH). You may wish to consult with OGC, the IC Privacy Coordinator and the ISSO to determine if there is already a TOS in place, or with other questions.

Have more questions? Visit:

- HHS Center for New Media: <http://www.newmedia.hhs.gov>
- HHS Open Government: <http://www.hhs.gov/open/index.html>
- GSA Negotiated Terms of Service Agreements: [https://forum.webcontent.gov/?page=TOS\\_agreements](https://forum.webcontent.gov/?page=TOS_agreements)
- OMB Memo 10-23: [http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda\\_2010/m10-23.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-23.pdf)
- IC Privacy Coordinators: [http://oma.od.nih.gov/about/contact/browse.asp?fa\\_id=3](http://oma.od.nih.gov/about/contact/browse.asp?fa_id=3)
- IC ISSOs: <http://ocio.nih.gov/nihsecurity/scroster.html>

**Feedback/Questions? Please contact the OSOP at: [privacy@mail.nih.gov](mailto:privacy@mail.nih.gov) or (301) 451-3426.**