



Privacy Impact Assessment
FTC User Accounts on News Media Sites
July 2014

This Privacy Impact Assessment (PIA) discusses the Federal Trade Commission’s use of registered accounts on news media and similar websites to permit FTC officials and staff to participate in live chats with news reporters or to conduct online consumer education activities on such sites, including blogging or contributing articles. See Appendix for a list of official FTC registered accounts on news media and similar websites.

As discussed below, the FTC does not use these accounts to collect, maintain, or disseminate any PII that may be available through such sites.

SECTION 1.0 – SPECIFIC PURPOSE OF THE AGENCY’S USE OF A THIRD-PARTY WEBSITE OR APPLICATION

1.1 – What is the specific purpose of the agency’s use of the third-party website or application and how does that use fit with the agency’s broader mission?

To participate in live chats with news reporters and to conduct online outreach and consumer education activities on such sites.

1.2 – Is the agency’s use of the third-party website or application consistent with all applicable laws, regulations, and policies?

Yes. See the following authorities:

- Section 6 of the FTC Act, 15 U.S.C. 46, authorizes the FTC to make information available in the public interest.
- OMB Memorandum M-10-06, *Open Government Directive* (2009), encourages Federal agencies to take concrete steps, such as making information available online, to promote transparency of their operations and activities.
- OMB Memorandum M-10-23, requires Federal agencies to perform a PIA when using third-party sites and application to engage with the public.

SECTION 2.0 – ANY PII THAT IS LIKELY TO BECOME AVAILABLE TO THE AGENCY THROUGH THE USE OF THE THIRD-PARTY WEBSITE OR APPLICATION

2.1 – What PII will be made available to the agency?

The PII made available to the FTC on news media and similar sites may include readers’ comments or account profiles posted by other site users, personal information reported about individuals in news articles, and other miscellaneous website content (e.g., online classifieds). The FTC does not obtain access to any additional PII by establishing an account on these sites.

2.2 – What are the sources of the PII?

The sources of PII include readers who may post comments or user profiles on the site, authors of articles on the site about themselves or other individuals, and creators of other miscellaneous content on the site (e.g., classified advertisers).

2.3 – Do the agency’s activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No. The FTC does not use these accounts to conduct public surveys or other agency information collection activities involving identical questions to nine or more persons under the PRA.

SECTION 3.0 – THE AGENCY’S INTENDED OR EXPECTED USE OF THE PII

3.1 – Generally, how will the agency use the PII described in Section 2.0?

Not applicable. The FTC does not use its site accounts to collect, maintain or disseminate PII. These accounts are used only to participate in live chats with news reporters or to conduct online outreach and consumer education activities on such sites. See also Section 8.1 below.

3.2 – Provide specific examples of the types of uses to which PII may be subject.

Not applicable. See Section 3.1 above.

SECTION 4.0 – SHARING OR DISCLOSURE OF PII

4.1 – With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

Not applicable. See Section 3.1 above.

4.2 – What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

Not applicable. See Section 7.1 below.

SECTION 5.0 – MAINTENANCE AND RETENTION OF PII

5.1 – How will the agency maintain the PII, and for how long?

Not applicable. See Section 3.1 above. The FTC may occasionally retain transcripts or other records of live chats or other consumer education activities conducted through these site accounts to satisfy preservation requirements of the Federal Records Act. Except as explained in Section 7.1 below, such records do not include PII, and PII may be redacted to avoid retention. Such transcripts or other records are retained and destroyed in accordance with applicable FTC policies and procedures and with FTC records retention schedule [N1-122-09-1](#) approved by the National Archives and Records Administration (NARA).

5.2 – Was the retention period established to minimize privacy risk?

Not applicable. See Sections 3.1 and 5.1 above.

SECTION 6.0 – HOW THE AGENCY WILL SECURE PII

6.1 – Will the agency’s privacy and security officials coordinate to develop methods of securing PII?

Not applicable. See Section 3.1 above. The FTC’s Chief Privacy Officer and Chief Information Security Officer coordinate to secure FTC information, including PII.

SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS

7.1 – What other privacy risks exist, and how will the agency mitigate those risks?

It is possible that official FTC accounts on news media or similar sites could be used by FTC officials or staff to disseminate PII, such as an FTC official or staff member discussing specific individuals who are the subject of nonpublic law enforcement matters in a live chat on the site. To control this risk, these accounts are authorized and administered through the FTC’s Office of Public Affairs and the Office of Commissioner Terrell McSweeney, and FTC officials and staff are reminded, via rules of behavior, guidance, and training, that they may discuss and disclose only publicly available information. The privacy risk created by the agency’s use of these online accounts is minimal because content posted on these sites is public and available to any visitor to the site.

The FTC may also periodically review these sites to ensure that unauthorized accounts are not opened by other individuals or entities attempting to impersonate the FTC, to reduce the risk of the FTC’s name and such accounts being used to improperly collect PII or to defraud, mislead, or otherwise harm consumers. In addition, where feasible, the FTC’s consumer education activities -- including its online chats and discussions – incorporate references to its official website, www.ftc.gov, to verify FTC statements or materials made on social media and elsewhere.

In addition, consistent with OMB Memorandum 10-23, FTC staff routinely examine the privacy policies of the sites it uses to engage the public, in order to evaluate the privacy risks, if any, and determine whether the website or application is appropriate for the agency’s use. To the extent feasible, FTC staff also monitor any changes to the sites’ privacy policies and periodically reassess the risks, to determine if the FTC should continue to maintain an account on the site. This review is conducted in accordance with OMB guidance and is separate from any review of online sites that might be conducted by FTC staff under the FTC Act or any other laws or rules that the FTC enforces or administers. Consumers who establish accounts on news media and

similar sites should review the privacy policies of these sites to evaluate the privacy risks, if any, in establishing accounts for themselves.

SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS

8.1 – Will the agency’s activities create or modify a “system of records” under the Privacy Act of 1974?

No. The FTC does not use these accounts to collect or maintain information about individuals in any FTC system of records that would be subject to the Privacy Act of 1974.

Outside of these accounts, publicly available information collected from news or other websites and maintained in agency systems of records about individuals under the Privacy Act is covered by [appropriate system of records notices \(SORNs\) published by the FTC](#).

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Appendix – Official FTC registered accounts on news media and similar websites

The FTC has the following registered accounts on news media and similar websites:

www.huffingtonpost.com

www.forbes.com

www.thehill.com

All managed by Commissioner Terrell McSweeney

www.cleveland.com

Managed by the FTC's East Central Regional office

SECTION 9.0 – Approval and Signature Page

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