



Privacy Program U.S. Access Board

Privacy Impact Assessment: Third-Party Social Media/Social Networking Websites and Applications

Section 1: System Information

1.1 Name of Website/Application: YouTube

1.2 Agency Account - Public URL/Name: Access Board YouTube Channel

1.3 Agency Account Administrator: Dave Yanchulis & Josh Shorr

1.4 Form Completed By: Aromie Noe, Dave Yanchulis, & Josh Shorr

1.5 Submission Date:

1.6 Reason for PIA Completion:

New third-party website/application

Changes to use of account by agency that affects data collection/privacy practices

Other (please specify): Existing third-party website account

Section 2: Overview and Purpose

2.1 Describe the website/application:

The Access Board's YouTube channel features mainly educational videos produced by the Office of Technical and Information Services (OTIS), as a way to reach architects, builders, state and local government officials, disability rights advocates, and other stakeholders. YouTube is a third-party website that allows people to view and share videos across the web by sharing links and embedding the videos on blogs and websites. The videos on the Board's YouTube channel are also available at the Access Board's website (www.access-board.gov).

2.2 Describe how use of the website/application will serve Access Board mission or program (with references to relevant sections of the ABA or Rehabilitation Act, if any)

The information that the Access Board (Board) disseminates through its YouTube account will help the Board fulfilling its statutory mission to provide appropriate technical assistance to interested parties (e.g., accessibility guidance and training) and promote accessibility throughout all segments of society. See 29 U.S.C. §792.

Section 3: General Requirements

3.1 Third-party privacy policies

- a. The Account Administrator has examined the website/application’s privacy policies, evaluated the risks, and determined that the site is appropriate for agency use.

Yes No

- b. The Account Administrator will periodically monitor the website/application’s privacy policies and reassess privacy risks, if needed.

Yes No

- c. The Account Administrator will ensure that, if a link to the third-party website/application is posted on the agency’s website that leads to a web location that is not part of an official government domain, the agency’s website will provide an alert to visitors (e.g., statement adjacent to link, “pop-up” notice) that they are being re-directed to a non-governmental, third-party website/application.

Yes No

3.2 Embedded applications

- a. The Account Administrator will ensure that, if the third-party website/application is embedded or incorporated on the agency’s website, visitors will be informed of the third-party’s privacy policies.

Yes No

3.3 Agency branding

- a. The Account Administrator will follow federal guidance suggesting that, when an agency uses a third-party website/application that is not part of a government domain, the agency will apply appropriate branding (e.g., placing agency logo on profile page on a social media site) to distinguish the agency’s activities from those of the non-governmental entity.

Yes No

3.4 Information collection

- a. If information is collected through the Access Board’s use of the website/application, the Account Administrator will ensure that only information necessary for the proper performance of agency functions and which has practical utility will be collected.

Yes No

3.5 Privacy policy notice

- a. The Account Administrator agrees to ensure that a privacy notice/disclosure statement, as approved by the Access Board Privacy Office, is posted on the website/application.

Yes No

Section 4: Information Collection

4.1 When using the website/application, does the Access Board plan to collect personally identifiable information (PII) from individuals? (If yes, please explain.)

Yes No

The Board does not collect any PII from individuals accessing its YouTube channel. Individuals are not required to register with YouTube to watch videos on the Board's YouTube channel. Individuals who choose to register with YouTube are required by YouTube to provide their username, email address, password, gender, and date of birth, and have the option to provide additional information. Some of this information may be accessible to the Board, depending on a YouTube user's privacy settings; however, the Board does not collect any of this information.

4.2 Will individuals be required to provide their name and/or email address to access or use the Access Board's page/account/channel on the website/application?

Yes No

4.3 By having an account on the website/application, will individuals' PII potentially be made available to the Access Board, regardless of whether the agency actively solicits or collects such information? (If yes, please explain.)

Yes No

Individuals are not required to register with YouTube to watch videos posted on the Board's YouTube channel. However, if users choose to create a YouTube account, YouTube requires users to provide their username, email address, password, gender, and date of birth, and have the option to provide additional information. Some of this information may be accessible to the Access Board, depending on a YouTube user's privacy settings.

4.4 Will individuals be permitted to post content on the website/application (e.g., post comments, ask questions, express views on regulatory initiatives)? (If yes, please explain.)

Yes No

No comments or ratings (including "likes" or "dislikes") by YouTube subscribers are allowed at the Board's YouTube channel.

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- *If you answered yes to any question in Section 4 above, a full PIA for the website/application is required. You must complete the remainder of this form.*
 - *If you answered no to all questions in Section 4 above, you do not need to complete a full PIA. Proceed to Section for review and approval.*
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Section 5: Openness and Transparency

5.1 Will the Access Board provide notice to individuals about how the agency will collect, use, or share their PII? (If yes, please explain.)

Yes No

Not applicable. The Board does not collect, use, or share any individuals' PII. The Board's YouTube channel clearly states that YouTube's privacy policies govern there, and provides the URL for YouTube's privacy policies. The channel makes it clear that the same videos can be viewed on the Board's website, which does not use any tracking technology. Information about where the Board's privacy policies can be found is also available to the public.

5.2 Will the Access Board use or access individuals' PII from the website/application? (If yes, please explain.)

Yes No

The Board does not use or access individual's PII. While individuals are not required to register on YouTube to watch videos posted on the Board's YouTube channel, YouTube requires users to provide their username, email, password, gender, and date of birth, when registering an account, and allows them to provide any additional information. Some of this information may be accessible to the Board, depending on a user's privacy settings.

5.3 Will the Access Board share individuals' PII from the website/application with other governmental agencies, private organizations, or persons (aside from Account Administrators)? (If yes, please explain.)

Yes No

The Access Board has no plan to share individual users' PII with other agencies, organizations, or persons.

Section 6: Information Retention and Security

6.1 If the Access Board plans to access, collect or store individuals' PII, describe the steps the agency will take to protect this information.

Not applicable. The Board does not access, collect, or store PII that YouTube collects from its registered users.

6.2 If the Access Board plans to access, collect, or store individuals' PII, how long with this information be retained? (Please consult with an Access Board records official about applicable record retention schedules.)

Not applicable. The Board does not access, collect, or store PII that YouTube collects from its registered users.

6.3 If the Access Board plans to access, collect, or store individuals' PII, describe the identified privacy risks and how such risks will be mitigated.

The Board has no plan to access, collect, or store individuals' PII. As explained earlier, the Board's YouTube channel provides the public with the web address of the Board's privacy policy program. The Board channel makes it clear that YouTube's privacy policies govern there and provides information on where YouTube's privacy policies can be found. It also notes that videos posted on this channel are also available on the Board's website

(www.access-board.gov), which does not use tracking technology.

Section 7: Legal Compliance

7.1 Will the Access Board’s use of the website/application trigger the Paperwork Reduction Act (PRA)? (Please consult with USAB/OGC concerning PRA requirements.)

Yes No

7.2 Will the Access Board’s use of the website/application trigger the Privacy Act of 1974 (e.g., creating or modifying a “system of records”)? (Please consult with the Privacy Office concerning PRA requirements.)

Yes No

Section 8: Privacy Office Review

Please submit completed forms to the Access Board Privacy Office (privacy@access-board.gov). An Access Board Privacy Officer will review the form and notify you whether the requested use of the third-party website/application has been approved.

For Access Board Privacy Office Use Only

Reviewed By (Privacy Officer): Gretchen Jacobs

Date: 5/25/2019

Requested use of third-party website/application is:

Approved (Use consistent with agency privacy policies and/or applicable federal authorities)

Approved, with conditions (specified below)

Denied (Use inconsistent with agency privacy policies and/or applicable federal authorities)

Signature (Privacy Officer): //e-signed// Gretchen Jacobs

Comments/Notes: