

US Department of Health and Human Services

Third Party Websites and Applications Privacy Impact Assessment

Date Signed:

September 21, 2015

OPDIV:

CMS

Name:

YouTube

TPWA Unique Identifier:

T-6230177-896593

Is this a new TPWA?

Yes

Will the use of a third-party Website or application create a new or modify an existing HHS/OPDIV System of Records Notice (SORN) under the Privacy Act?

No

Will the use of a third-party Website or application create an information collection subject to OMB clearance under the Paperwork Reduction Act (PRA)?

No

Does the third-party Website or application contain Federal Records?

No

Describe the specific purpose for the OPDIV use of the third-party Website or application:

HealthCare.gov has created and maintains an educational presence on YouTube in the form of a HealthCare.gov branded page. This page allows for a direct connection with end users and to provide broad educational opportunities and limited opportunities to address consumer questions and concerns. YouTube is a popular platform where users can consume videos and interact (like, share, comment) with videos related to their personal interests, they can also "subscribe" to our page to receive notifications whenever a new video is available. HealthCare.gov has created a branded page on YouTube to provide educational content in a space where many potential end users of products made available on HealthCare.gov are already spending their time online. The primary purpose of having a branded page on YouTube is to curate a video channel that promotes information related to HealthCare.gov and to provide resources to consumers who may not be regular visitors to the HealthCare.gov website.

Have the third-party privacy policies been reviewed to evaluate any risks and to determine whether the Website or application is appropriate for OPDIV use?

Yes

Describe alternative means by which the public can obtain comparable information or services if they choose not to use the third-party Website or application:

Consumers are also educated through traditional advertising through TV, radio, HealthCare.gov and local partners/counseling entities and events. Additionally information is available through other 3rd party digital properties such as Facebook, Twitter, and Google+.

Does the third-party Website or application have appropriate branding to distinguish the OPDIV activities from those of nongovernmental actors?

Yes

How does the public navigate to the third party Website or application from the OPDIV?

An external hyperlink from an HHS Website or Website operated on behalf of HHS

Please describe how the public navigate to the thirdparty website or application:

Directly through YouTube.com, via a connect icon on the HealthCare.gov site, using a web search or via a web-based URL to content hosted on YouTube.com.

If the public navigate to the third-party website or application via an external hyperlink, is there an alert to notify the public that they are being directed to anongovernmental Website?

Yes

Has the OPDIV Privacy Policy been updated to describe the use of a third-party Website or application?

Yes

Provide a hyperlink to the OPDIV Privacy Policy:

<https://www.healthcare.gov/privacy/>

Is an OPDIV Privacy Notice posted on the third-part website or application?

Yes

Is PII collected by the OPDIV from the third-party Website or application?

No

Will the third-party Website or application make PII available to the OPDIV?

Yes

Describe the PII that will be collected by the OPDIV from the third-party Website or application and/or the PII which the public could make available to the OPDIV through the use of the third-party Website or application and the intended or expected use of the PII:

CMS does not collect any PII through its use of YouTube. Google owns many products including Google+, YouTube, Gmail, and Google Search. One user account accesses all of these platforms. So if a user creates a Google Account, it becomes their Google+ Profile and YouTube account, etc. Individual users who register with Google are required to provide a first name, last name, valid email address, password, sex, and date of birth. Once registered, users have the option to provide additional information about themselves such as telephone number, employment, interests, etc. which may be displayed on the individual user's personal Google+ profile page or otherwise maintained or used by Google (see Google.com/policies/privacy for review of their data policy, and how they may use the provided information).

This information may be available to CMS page administrators in whole or part, based on a user's privacy settings. CMS does not solicit, collect, or maintain any personally identifiable information from individuals who visit, view, give a thumbs up, comment, share or otherwise engage with the HealthCare.gov YouTube page. The HealthCare.gov YouTube page administrator may however, read, review, or rely upon information that individuals make available on YouTube in the form of comments for the purposes of responding to a user's question. Even though this information may be accessible to HealthCare.gov's YouTube page administrators, CMS does not collect, disseminate, or maintain of the information provided on HealthCare.gov's YouTube page.

Describe the type of PII from the third-party Website or application that will be shared, with whom the PII will be shared, and the purpose of the information sharing:

This information is not shared beyond HealthCare.gov and YouTube Administrators. It is not collected or maintained outside of YouTube or used for other CMS purposes.

If PII is shared, how are the risks of sharing PII mitigated?

This data is kept within the YouTube platform. It is not downloaded into other tools and or

Will the PII from the third-party website or application be maintained by the OPDIV?

No

Describe how PII that is used or maintained will be secured:

CMS does not keep separate records or accounting of YouTube users or their interaction with the HealthCare.gov YouTube page. CMS does not store or share this information. User information is retained by Google as long as a user maintains a Google account. See Google's privacy policy to see how long user information is retained after an account has been deleted. Google users can learn more about how their information is used and maintained by Google by visiting Google's data policy located at www.Google.com/policies/privacy.

What other privacy risks exist and how will they be mitigated?

Note in reference to Question 15b - Due to limitations on YouTube, the HealthCare.gov Privacy Notice is not posted in all locations on the HealthCare.gov YouTube page. It is viewable from any place on the HealthCare.gov YouTube page by clicking on the "About" tab. The language included highlights that YouTube has its own policy and includes a link to that policy as well.

YouTube is a third-party service that uses persistent tracking technologies. In an effort to help consumers understand how their information is used by Google, the HealthCare.gov YouTube page includes a privacy notice, which addresses this topic.

Per the terms of service agreed to by HHS and YouTube, HealthCare.gov's YouTube account does not contain any third-party advertising. This limits any association with additional content that HealthCare.gov has neither reviewed nor endorsed on the HealthCare.gov YouTube page. In addition, the HealthCare.gov Privacy Notice at HealthCare.gov and on its YouTube page directs YouTube users to review YouTube's terms of service and privacy policies to understand how YouTube may collect information about users, including what pages the user may visit, and how YouTube may use or share such information for third-party advertising or other purposes.

In addition to the notice on YouTube, consumers are provided notice on HealthCare.gov. A link to our Linking Policy is in the footer of HealthCare.gov. Our Linking Policy includes a privacy notice for social media sites and provides links to HealthCare.gov presences on Third Party sites as well as the privacy policies of those social media sites. Additionally, when a consumer places their mouse cursor over a link to a social media site, hover text informs them that they will be "Leaving HealthCare.gov" if they click.

YouTube is created and maintained by Google. CMS has reviewed YouTube's privacy practices and has concluded that risks to consumer privacy are sufficiently mitigated through application of YouTube's privacy policies, notices from HealthCare.gov and YouTube informing consumers of these policies, and the ability of consumers to opt-out of providing their information to HealthCare.gov and YouTube.

CMS will conduct a periodic review of YouTube's privacy practices to ensure YouTube's policies continue to align with agency objectives and privacy policies and do not present unreasonable or unknown risks to consumer privacy.