



Adapted Privacy Impact Assessment

Sketchfab

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Contact

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SECTION 1: Specific Purpose of the Agency's Use of the 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?

The mission of the Bureau of Ocean Energy Management (BOEM) is to manage development of U.S. Outer Continental Shelf (OCS) energy, mineral, and geological resources in an environmentally and economically responsible way. This mission also includes BOEM's responsibility to ensure that significant archaeological sites are not adversely affected by oil and gas exploration and development. The National Historic Preservation Act (NHPA) of 1966, as amended, is federal legislation developed to ensure that our nation's historical and archaeological properties are not lost through neglect or inadvertently damaged by activities permitted or funded by federal agencies. Section 106 of the NHPA requires BOEM to institute procedures to assure that federal plans and programs contribute to the preservation and enhancement of non-federally owned sites and structures, as well as objects of historical, architectural, or archaeological significance.

Archaeological sites on the OCS are most likely either prehistoric Native American sites (dating from the time at the end of the last Ice Age when sea levels were about 200 feet lower than they are today) or historic shipwrecks. Historical research indicates that over 2,000 ships have sunk on the federal OCS between 1625 and 1951; thousands more have sunk closer to shore in state waters during the same period. Archaeologists have discovered historic shipwrecks dating from as early as the 16th century A.D. to as recent as World War II in all parts and in all water depths of the Gulf of America. The archaeological research conducted by BOEM and other scientists in the Gulf of America contributes to our understanding of how our nation developed by studying the technology that fostered the growth of the U.S. Part of this research includes imaging shipwreck sites, some of which are discovered through industry surveys.

BOEM makes information about its research activities available online through the [Environmental Studies Program Hub](#), BOEM Web pages, and approved third-party applications such as Sketchfab. Sketchfab enables its users to publish and find three-dimensional (3D) content online. Sketchfab users can upload and submit 3D models, images, and related content, along with comments and other information. Sketchfab's technology is integrated with every major 3D creation tool and publishing platform and is compatible across every browser, operating system, desktop, and mobile. Sketchfab also supports virtual reality (VR) and augmented reality headsets. Users may embed the service's player anywhere on the Web, thereby enabling them to view and share 3D and VR content on other social media platforms. Sketchfab also offers an online store from which users can review and purchase model files online.

BOEM's use of Sketchfab to share 3D models of historic archaeological sites on the OCS has enabled the bureau to be more inclusive in its communications, reach new audiences, and better educate the public about BOEM's mission. BOEM's official use and presence on Sketchfab does not constitute an endorsement or preference for the services, products, or information on Sketchfab.



- 1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

BOEM programs and offices are responsible for using Sketchfab in accordance with applicable laws, regulations, and policies and will identify specific legal authorities that cover their activities in Privacy Notices, as appropriate. Any planned use of Sketchfab that falls outside the scope of this assessment will require a complete PIA exclusive to the Sketchfab use.

Legal authorities that authorize the use of Sketchfab include the following: Presidential Memorandum – Building a 21st Century Digital Government, May 23, 2012; Presidential Memorandum on Transparency and Open Government, January 21, 2009; Office of Management and Budget (OMB) Memorandum M-10-06, Open Government Directive, December 8, 2009; OMB Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010; OMB Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; OMB Memorandum M-13-13, Open Data Policy—Managing Information as an Asset, May 9, 2013; OMB Circular A-130, Managing Information as a Strategic Resource, July 28, 2016; and the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.).

SECTION 2: 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 [Sketchfab Privacy Policy](#) specifies what personally identifiable information (PII) and non-personal data Sketchfab collects from registered users and application visitors, as well as how Sketchfab uses the information to manage its services and business. Individuals without a Sketchfab account can view, share, and embed models posted on Sketchfab. However, individuals must be logged into a Sketchfab account to download files, post comments, or “like” posts. Individuals can sign up for a Sketchfab account by providing Sketchfab with basic registration information like their name, a public-facing display name, password, country, and email address. Individuals may also sign up via third-party accounts such as X, Google, or Facebook. At their discretion, registered Sketchfab users can expand their profile by adding a profile picture, organization name, location, page description, website URL, and other categories of information. Any information a user adds to their Sketchfab profile is publicly visible and can be managed through their Profile Settings.

Limited PII will be made available to BOEM through its use of Sketchfab. Sketchfab does not directly share any user information with BOEM. BOEM will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM beyond the application (e.g., by interacting with BOEM via email or the bureau's linked official social media accounts). If a Sketchfab user interacts with BOEM by liking or commenting on an uploaded BOEM model, the user's public profile information and display name will become available to BOEM and the entire Sketchfab community.



If a registered Sketchfab user or application visitor interacts with BOEM beyond Sketchfab, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM.

2.2 What are the sources of the PII?

Sources of PII are Sketchfab users worldwide, which may include members of the general public; federal, state, local, and tribal government representatives; and representatives of industry, non-profit organizations, media outlets, and research and educational institutions.

2.3 Will the PII be collected and maintained by the agency?

BOEM uses Sketchfab to disseminate information and increase government transparency. BOEM does not actively collect, maintain, or disseminate PII while using Sketchfab. BOEM will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM beyond the application. If a Sketchfab user interacts with BOEM through Sketchfab, the user's display name and public profile information will become available to BOEM. If applicable, BOEM will use the information to provide a response or requested service (through Sketchfab when possible).

If a registered Sketchfab user or application visitor interacts with BOEM beyond Sketchfab, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM. BOEM will use the minimum required information to provide a response or requested service (if applicable) and will maintain PII as appropriate in accordance with the applicable records schedule.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. In these cases, BOEM may collect and share information about the user interaction (e.g., display name, public profile, contents of postings, and other information made available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law. BOEM will secure such information in accordance with applicable DOI privacy and security policies.

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

No, BOEM is not using Sketchfab to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act (PRA). Any planned use of Sketchfab or a related activity that will invoke the PRA will require a complete PIA exclusive to the collection and coordination with the BOEM Information Collection Clearance Officer.



SECTION 3: 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?

BOEM does not actively collect, maintain, or disseminate PII while using Sketchfab. If a Sketchfab user or member of the public interacts with BOEM through Sketchfab, BOEM will use the minimum required information to provide a response or requested service if applicable (through Sketchfab when possible).

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

The [Sketchfab Privacy Policy](#) specifies what PII and non-personal data Sketchfab collects from registered users and application visitors, as well as how Sketchfab uses the information to manage its services and business.

If a registered Sketchfab user interacts with BOEM by liking or commenting on an uploaded BOEM model, the user's display name and public profile information will become available to BOEM and the entire Sketchfab community. If a user comment includes a question or request for assistance, BOEM will use the minimum required information to provide a response or requested service (through Sketchfab when possible).

If a registered Sketchfab user or application visitor interacts with BOEM beyond Sketchfab, the submitter's email address and any other information voluntarily provided in the message will become available to BOEM. BOEM will use the minimum required information to provide a response or requested service (if applicable).

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. In these cases, BOEM may collect and share information about the user interaction (e.g., display name, public profile, contents of postings, and other information made available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law. BOEM will secure such information in accordance with applicable DOI privacy and security policies.

SECTION 4: 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?

Sketchfab is a third-party application used by a variety of individuals and organizations worldwide. The Sketchfab Privacy Policy describes the limited circumstances in which Sketchfab will share information with external third parties. BOEM is not responsible for how registered Sketchfab users and application visitors may access or use data posted on Sketchfab. By choosing to create an account and interacting with other users' posts, Sketchfab users are voluntarily sharing information publicly. Users must understand that they are responsible for their account settings and posted content and exercise caution.



Authorized BOEM Sketchfab users do not actively collect, maintain, and disseminate PII while using Sketchfab and will not have access to any information collected and maintained by Sketchfab beyond what a Sketchfab user makes accessible to the Sketchfab community (including BOEM) or BOEM beyond the application. BOEM will use the minimum required information to provide a response or requested service to registered Sketchfab users and application visitors. In doing so, BOEM may share PII with other DOI bureaus and offices, federal agencies, or external stakeholders as necessary and when required by federal law, executive order, or regulation.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI policy. In such instances, BOEM may share the information that becomes available to the bureau through Sketchfab to notify the appropriate agency officials or law enforcement organizations.

To the rare extent that records BOEM creates while using Sketchfab are considered Privacy Act records, BOEM will maintain them consistent with the Privacy Act and will not disclose such records by any means of communication to any person or another agency unless disclosure is pursuant to the prior written request by, or with the prior written consent of, the individual to whom the record pertains, or if the disclosure is otherwise consistent with the Privacy Act.

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

DOI entered into federal-compatible Terms of Use for the official use of Sketchfab by DOI bureaus and offices. BOEM programs and offices planning to use Sketchfab must first review the Sketchfab Adapted PIA and consult with the BOEM Associate Privacy Officer (APO) to ensure that the planned use of Sketchfab will comply with applicable federal and DOI privacy policies. BOEM employees are required to complete security, privacy, and records management training to ensure they understand their responsibility to protect individual privacy and appropriately manage information before they acquire access to the DOI network and information systems and annually thereafter. BOEM employees with significant privacy responsibilities are also required to complete role-based privacy training (RBPT) on an annual basis.

Only approved BOEM employees will have access to manage the official BOEM Sketchfab accounts and create official postings. BOEM Sketchfab users can employ the collaboration features available to Enterprise users to share, manage, and collaborate on 3D assets, as permitted by role-based permissions managed by an Administrator. BOEM employees who use Sketchfab are required to use their official business email address while using the service for bureau-sponsored activities and must protect their account information to prevent unauthorized access. BOEM personnel review proposed Sketchfab content prior to posting to prevent the unauthorized disclosure of personal data or privileged information. The Administrator must verify the termination of Sketchfab accounts belonging to departing employees.



Sketchfab is responsible for protecting its users' privacy and the security of user data within the application. Sketchfab users are subject to the application's Privacy Policy, are bound to the Terms of Use, and must use their own discretion with respect to their account settings and the personal information they provide to enhance their account profiles.

SECTION 5: Maintenance and Retention of PII

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

In accordance with the [DOI Digital Media Policy](#), BOEM does not use third-party websites and applications as the sole venue for disseminating information related to official bureau functions. BOEM does not actively collect or maintain PII from interactions or use of Sketchfab. BOEM will maintain PII that becomes available to the bureau while using Sketchfab or through interactions outside of Sketchfab if the interactions create federal records.

Electronic messages created or received in the course of agency business are federal records. Some types of electronic messages, such as email messages, are more likely to contain substantive information and thus are likely to require retention for several years, or even permanently. Current business practices make it more likely that other types of electronic messages, such as chat and text messages, contain transitory information or information of value for a much shorter period of time.

General information requests sent to BOEM electronically are covered under DRS 1 – Administrative DAA-0048-2013-0001-0003, Administration Records of Specific Temporary Value. These records have a temporary disposition, are cut off when 90 days old, and are destroyed when no longer needed.

When records provide information that may be used in the conduct of an investigation and are copied and/or forwarded on for potential use by an investigator, the original owner of the record must acknowledge that these may be used for evidentiary purposes that require further preservation. Records disposition (whether destruction or retirement) can be suspended in the case of active litigation or investigation, but only with active communication from the investigating office (or the solicitor). Otherwise, records will be maintained for the time indicated in the approved records schedule and disposed of accordingly.

5.2 Was the retention period established to minimize privacy risk?

BOEM programs and offices routinely mitigate privacy risk by limiting their collection of PII to what is necessary to facilitate and manage official BOEM activities and refraining from collecting sensitive PII unless necessary to accomplish a specific function.

BOEM does not actively collect, maintain, and disseminate PII while using Sketchfab. In cases in which data serves to support bureau business, it will be filed with the pertinent records it supports and BOEM will follow the corresponding disposition instructions.



SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

Bureau of Safety and Environmental Enforcement (BSEE) Security Officials, the BOEM Associate Chief Data Officer, and the BOEM APO must coordinate to evaluate the security and privacy risks posed by a third-party service that BOEM has proposed for use in accordance with established Departmental procedures.

BOEM employees are required to complete security, privacy, and records management training to ensure they understand their responsibility to protect individual privacy and appropriately manage information before they acquire access to the DOI network and information systems and annually thereafter. Privacy and Security officials will coordinate with the BOEM/BSEE DOI Talent Data Steward to ensure that employees have fulfilled their training obligations, as required.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

The Sketchfab Privacy Policy specifies what PII and non-personal data Sketchfab collects from users and application visitors, as well as how Sketchfab uses the information to manage its services and business. The Sketchfab Help Center contains additional information on how Sketchfab protects user privacy and security.

In accordance with the DOI Digital Media Policy, official social media accounts must have a primary point of contact who is responsible for managing account security, overseeing employee access and training, and distributing guidance. The contact must be a full-time, permanent federal employee. Before gaining access to an official social media account, employees must complete mandatory social media training and sign DOI's social media user agreement. Only approved BOEM employees will have access to manage official BOEM Sketchfab accounts and create official postings. BOEM Sketchfab users must create and manage all BOEM Sketchfab pages through official BOEM accounts while using a protected, official government device. The primary contact for a social media account is responsible for making sure that employees complete these requirements and must also remove account access for employees who no longer need it within 24 hours.

Access to the DOI network is restricted to authorized users with multi-factor authentication controls, servers are located in secured facilities behind restrictive firewalls, and access to databases and files is controlled by the system administrator and restricted to authorized personnel based on the need-to-know principle. Other security controls include continuously monitoring threats and rapid response to incidents. All DOI employees are required to complete annual Information Management and Technology Training and sign the Information Systems Security Rules of Behavior Acknowledgment. Employees who have significant privacy responsibilities must also complete RBPT. A key issue addressed in privacy awareness training and RBPT is the requirement of employees to report any suspected or confirmed privacy breach immediately to their supervisor and local IT help desk, the BOEM APO, or the DOI Computer Incident Response Center (CIRC) within one hour of discovery.



While BOEM does not actively collect, maintain, or disseminate PII while using Sketchfab, BOEM employees can help protect non-public PII that becomes available to the bureau related to its use of Sketchfab by handling email messages from registered Sketchfab users and application visitors appropriately and avoiding the storage of records that contain PII on shared networks or folders accessible to individuals who do not have an official need-to-know. All BOEM employees must coordinate with their supervisor and other appropriate officials to ensure that physical, technical, and administrative safeguards are in place protect the records in their custody. BOEM employees are responsible for safeguarding all information they remove from their official duty station and information they create at any alternative workplace in accordance with the Federal Records Act, Privacy Act, Freedom of Information Act, and other federal laws, regulations, and DOI policies. All BOEM Sketchfab users must report any compromise of their accounts or related records to the appropriate Sketchfab and DOI officials in accordance with established procedures.

There may be unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. In these cases, BOEM may share information about the user interaction (e.g., display name, public profile, contents of postings, and other information made available to the bureau through Sketchfab) to notify the appropriate agency officials or law enforcement organizations as required by law. BOEM will secure such information in accordance with applicable DOI privacy and security policies.

SECTION 7: Identification and Mitigation of Other Privacy Risks

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

BOEM undertakes a number of actions to mitigate other privacy risks posed by Sketchfab use. BOEM follows established procedures to identify, evaluate, and address any new additional privacy requirements that may result from new statutes, regulations, and policies. BOEM also evaluates the privacy risks posed by proposed new uses of Sketchfab and any new changes to Sketchfab and/or the Sketchfab Privacy Policy, ensures users have access to an adequate BOEM Privacy Notice, moves quickly to remediate privacy breaches, and reports misrepresentation by other Sketchfab users as applicable.

The privacy risks posed by BOEM uses of approved third-party applications must be evaluated through a privacy assessment. Any proposed BOEM use of Sketchfab that is not covered by this Adapted PIA will require coordination with the BOEM APO to update privacy compliance documentation. Additional privacy requirements may also apply.

Sketchfab is an independently owned and operated third-party application. Beyond its official postings, BOEM has no control over access restrictions or procedures on the Sketchfab site or the content posted on Sketchfab. Sketchfab users are subject to the [Sketchfab Terms of Use](#) and [Privacy Policy](#) and control access to their own PII via user profile settings and through discretion with respect to the personal information they provide in posts, comments, or direct communications with other Sketchfab users. The BOEM APO will reassess the Sketchfab Privacy Policy in response to changes (and annually, at a minimum) to ensure that any policy changes do not adversely impact the



bureau's ability to balance platform use and the privacy of individuals. The BOEM APO will monitor any changes to Sketchfab's Privacy Policy and update this Adapted PIA, as necessary. Sketchfab users are responsible for evaluating Sketchfab Privacy Policy changes and determining for themselves whether the changes introduce any risks they are not willing to accept.

The BOEM APO will coordinate with BOEM programs and offices to ensure that a proper BOEM Privacy Notice is posted on official BOEM Sketchfab profile pages to provide appropriate notice to users. Users who have any questions about Sketchfab's privacy practices may contact the platform directly. Sketchfab users can also choose to delete their account at any time and visit official BOEM websites and pages to access publicly available bureau information, although creation of a Sketchfab account is not required to view content that BOEM has made publicly available on Sketchfab.

Sketchfab contains links and features that enable its users to access other third-party websites and services, which are governed by their own terms of use and privacy policies. Neither BOEM nor Sketchfab are responsible for the contents of any linked site that they do not manage. The Sketchfab Privacy Policy reminds users that the platform does not accept any responsibility or liability for the privacy and security policies of third-party websites or services linked to or from the mobile application. Users must exercise caution before proceeding to any third-party service or entering into any transaction with third parties. Users must also be cautiously aware of the information they share with integrated applications and should take care to avoid disclosing sensitive PII, which could be used by unintended persons to commit fraud or identity theft, or for other harmful or unlawful purposes. Users may also receive spam or other unsolicited or fraudulent communications as a result of their interactions on Sketchfab. Sketchfab users who have provided PII to third-party services and websites linked within the application must contact those third parties to withdraw consent in accordance with the respective privacy policy of the third parties.

There are risks posed by privacy breaches at the service and bureau levels. Although both BOEM and Sketchfab employ physical, technical, and administrative controls to help prevent security breaches, neither can guarantee that a breach will never occur. All Sketchfab users must guard their account against compromise by protecting their account information, regularly updating their password, and taking appropriate action if their account is compromised. In the event of a breach on the platform, Sketchfab will take reasonable steps to investigate the situation and, where appropriate, notify affected individuals in accordance with any applicable laws and regulations.

If PII in any medium or format is confirmed or suspected to have become available to individuals who do not have an official need-to-know, BOEM employees are required to immediately report the compromise of PII to their supervisor and local IT help desk or the BOEM APO. Breaches may also be reported directly to DOI-CIRC. Timely reporting and response enable the agency to take immediate steps in accordance with the DOI Privacy Breach Response Plan to mitigate any harm resulting from the compromise.

There is a risk that third-party accounts or content may misrepresent agency authority or affiliation. Certain third-party accounts, social media websites, or content may not be officially authorized by, or affiliated with BOEM, even where they appear to represent BOEM or the U.S. Federal Government. Interacting with such unauthorized accounts



may expose users to privacy or security risks. BOEM will make every reasonable effort to label or identify its official account pages to help users distinguish them from any unauthorized account pages (such as ensuring that official BOEM Sketchfab pages bear a “PRO” verification icon). BOEM will also inform Sketchfab about any official accounts or pages purporting to represent BOEM, seek their removal, and warn users about such accounts or pages.

- 7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?

All Sketchfab users have an opportunity to review the Sketchfab Privacy Policy and Terms of Use prior to creating a Sketchfab account or using the application (with limited capabilities). By creating a Sketchfab account, a user agrees to both the Sketchfab Terms of Use and the Privacy Policy. The Sketchfab Privacy Policy specifies what PII and non-personal data the application collects from users and how it uses, processes, and stores the information. Sketchfab may revise its Privacy Policy periodically to reflect changes in its practices or relevant laws. The most current version of the Privacy Policy will govern Sketchfab’s use of its users’ personal data and will always be available for review on the Sketchfab Privacy Policy Web page. If Sketchfab makes a material change to this Privacy Policy, Sketchfab will notify registered users via the application or the email associated with their account within 30 days before publication.

Participating BOEM programs and offices will ensure, to the extent feasible, that they display appropriate branding and provide notice to individuals on the privacy risks associated with their use of Sketchfab through this Adapted PIA, links to BOEM’s official website and the DOI Privacy Policy, and a Privacy Notice. BOEM has posted a Privacy Notice on the bureau’s official Sketchfab profile page to inform Sketchfab users that the [DOI Privacy Policy](#) does not apply to Sketchfab or any third-party sites individuals may encounter links to while using Sketchfab and the bureau is only responsible for the quality of the information its posts using official accounts (and not for the quality of the information posted by other users). The DOI Privacy Policy describes how DOI bureaus and offices handle information that becomes available to them through their official accounts on third-party websites.

SECTION 8: 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, BOEM’s typical use of Sketchfab will not create or modify a system of records under the Privacy Act of 1974 since the bureau does not actively collect, maintain, or disseminate PII while using Sketchfab. Any BOEM program or office that creates a system of records while using Sketchfab must a) coordinate with the BOEM APO to identify the applicable SORN or the need to publish a new one, b) provide an appropriate notice to individuals, and c) maintain the records in accordance with the applicable SORN. The BOEM APO will also update this Adapted PIA as required to provide notice.



There may be unusual circumstances where interactions between BOEM and other Sketchfab users indicate evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. BOEM may use information provided by a user and/or the contents of posts or private messages to notify the appropriate agency officials or law enforcement organizations. The bureau's maintenance of this information may create a system of records.

8.2 Provide the name and identifier for the Privacy Act system of records.

Any Any BOEM program or office that creates a system of records while using Sketchfab must maintain the records in accordance with the appropriate SORN. INTERIOR/DOI-08, DOI Social Networks - 76 FR 44033 (July 22, 2011); modification published 86 FR 50156 (September 7, 2021) covers the cases in which BOEM's maintenance of information of user interactions on a third-party platform to notify agency officials and/or law enforcement organizations may create a system of records. BOEM Sketchfab activities not covered by the INTERIOR/DOI-08, DOI Social Networks SORN may require the publication of a new or modified SORN to provide appropriate notice to the public.