

# Privacy Impact Assessment

Technology, Planning, Architecture, & E-Government

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# **Privacy Impact Assessment for the USDA Facebook Page**

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## Abstract

The Office of Communications administers the official USDA Facebook page, a social networking website, to share content with the public. This PIA is being conducted to evaluate privacy risks through use of this channel.

The USDA Facebook page can be accessed online by users and non-users of Facebook at: <http://www.facebook.com/USDA>.

## Overview

- The Office of Communications, Web Communications Division (OC/WCD), manages USDA's official Facebook page. OC/WCD coordinates with agency representatives, who are granted administrator access to the page in order to share and monitor any mission or issue specific content.
- The USDA Facebook page is part of the Department's overall communication and outreach effort to ensure the public is aware of various programs, policies and events. Facebook provides the public with a convenient and familiar venue for published information. The USDA Facebook page is used to promote USDA information and resources to individuals who use the social networking site and who may not be regular visitors to the USDA and agency websites.
- Information published to the USDA Facebook page will be previously approved by relevant Department and agency public affairs staff members, and will be available in the public domain. Information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.
- OC/WCD administers the USDA Facebook page with specially designated agency communication staff user accounts, established solely to administer the USDA Facebook page. Administrators are limited to OC/WCD staff and agency public affairs staff or webmasters. Agency staff will not use such administrative accounts for any personal purpose, such as sending Facebook emails, commenting on pages or accepting or sending friend requests. USDA staff may, on behalf of the Department, "like" other government and official partner pages.
- USDA Facebook page administrators monitor comments on the page and may delete comments that are in violation of the USDA comment policy. The comment policy is posted on the USDA Facebook information page as well as the USDA website. All deleted comments are maintained as screen shots in a Word document for records management purposes.
- Occasionally page administrators will respond to comments or questions on the Facebook page when a publicly available resource is useful. Responses include

previously approved information or publicly available information on USDA or agency websites.

- USDA does not collect information about visitors, commenters or fans of the USDA Facebook page. Administrators only share information that is already published to the USDA or agency websites in the public domain.
- USDA may use aggregate information provided by Facebook Insights for internal reporting only.
- USDA reviewed the federally negotiated Terms of Service Agreement in coordination with the Office of General Counsel and Office of the Chief Information Officer.

## **Section 1.0 Characterization of the Information**

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

### **1.1 What information is collected, used, disseminated, or maintained in the system?**

USDA will not collect, maintain, or disseminate personally identifiable information (PII) from individuals who visit the USDA Facebook page. Page administrators monitor comments on the page and may remove those comments in violation of the comment policy. All comments that are removed are maintained in a Word document for records management purposes (record schedule in development).

Individuals who register with Facebook are required by Facebook to provide a first name, last name, valid email, password, sex, and date of birth, and have the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Facebook user's privacy settings, the department will not collect, disseminate, or maintain any of this information.

Facebook collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA Facebook page and the interactions of those visitors with content posted on the site. These metric reports contain aggregate information, but no PII.

USDA uses the Facebook page to share information that is already cleared and available on USDA and agency websites. This information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.

### **1.2 What are the sources of the information in the system?**

Facebook collects PII from individuals who register with the site, however USDA does not collect, maintain, or disseminate that information. Individuals who register with the site control what information is shared, and their specific Facebook privacy settings.

USDA uses the Facebook page to share information that is already cleared and available on USDA and agency websites. This information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.

### **1.3 Why is the information being collected, used, disseminated, or maintained?**

Individuals who want to become registered users of Facebook must provide Facebook the information outlined in Section 1.1. The USDA does not, collect, maintain, or disseminate that information.

USDA Facebook page administrators will be able to see the names of those individuals who indicate that they like the page, as well as any other information those individuals have decided to make available via their Facebook profile based on their specific privacy settings.

Facebook Insights provide USDA Facebook page administrators with metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. USDA staff use Insights to evaluate and refine communication strategies and identify popular content uses these reports, which do not contain any PII.

### **1.4 How is the information collected?**

USDA does not collect any PII from individuals who visit the USDA Facebook page.

### **1.5 How will the information be checked for accuracy?**

Because the USDA does not collect, disseminate, or maintain PII from individuals who visit and/or “like” the USDA Facebook page. USDA staff do not check the accuracy and timeliness of that information posted by the Facebook user.

Information shared on the USDA Facebook page is already cleared for accuracy and available on USDA and agency websites.

### **1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

USDA does not collect any PII from individuals who visit the USDA Facebook page.

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

USDA does not collect any PII from individuals who visit the USDA Facebook page.

Because only select number of USDA and agency staff has access to the USDA Facebook page, and because USDA information distributed through the system will be cleared and approved before posted, any risk that information, including PII, which is not appropriate for public dissemination will be posted is mitigated.

Additionally, Facebook's privacy policy applies to information any individual provides on the USDA Facebook page, not the department.

There are other privacy risks that are not within the control of USDA and that the Department has limited ability to mitigate. The government's Terms of Service with Facebook prohibits the appearance of third party advertisements on the official USDA Facebook page. This, therefore, eliminates the risk posed by third party advertisements and associated cookies or malware to individuals who might click advertisements.

There is also a risk that individuals who interact with the USDA Facebook page, by liking or commenting on information for instance, may reveal PII or other sensitive information about themselves or others, or include links that may adversely affect those who click on them (such as links to malicious software or to content that otherwise violates the law). These types of actions are addressed by the USDA comment policy posted on the Department website and the USDA Facebook page. Page administrators monitor and will delete any comments that contain PII or sensitive information as stated in the official comment policy.

## **Section 2.0 Uses of the Information**

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### **2.1 Describe all the uses of information.**

USDA uses the Facebook page to share information that is already cleared and available on USDA and agency websites. This information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.

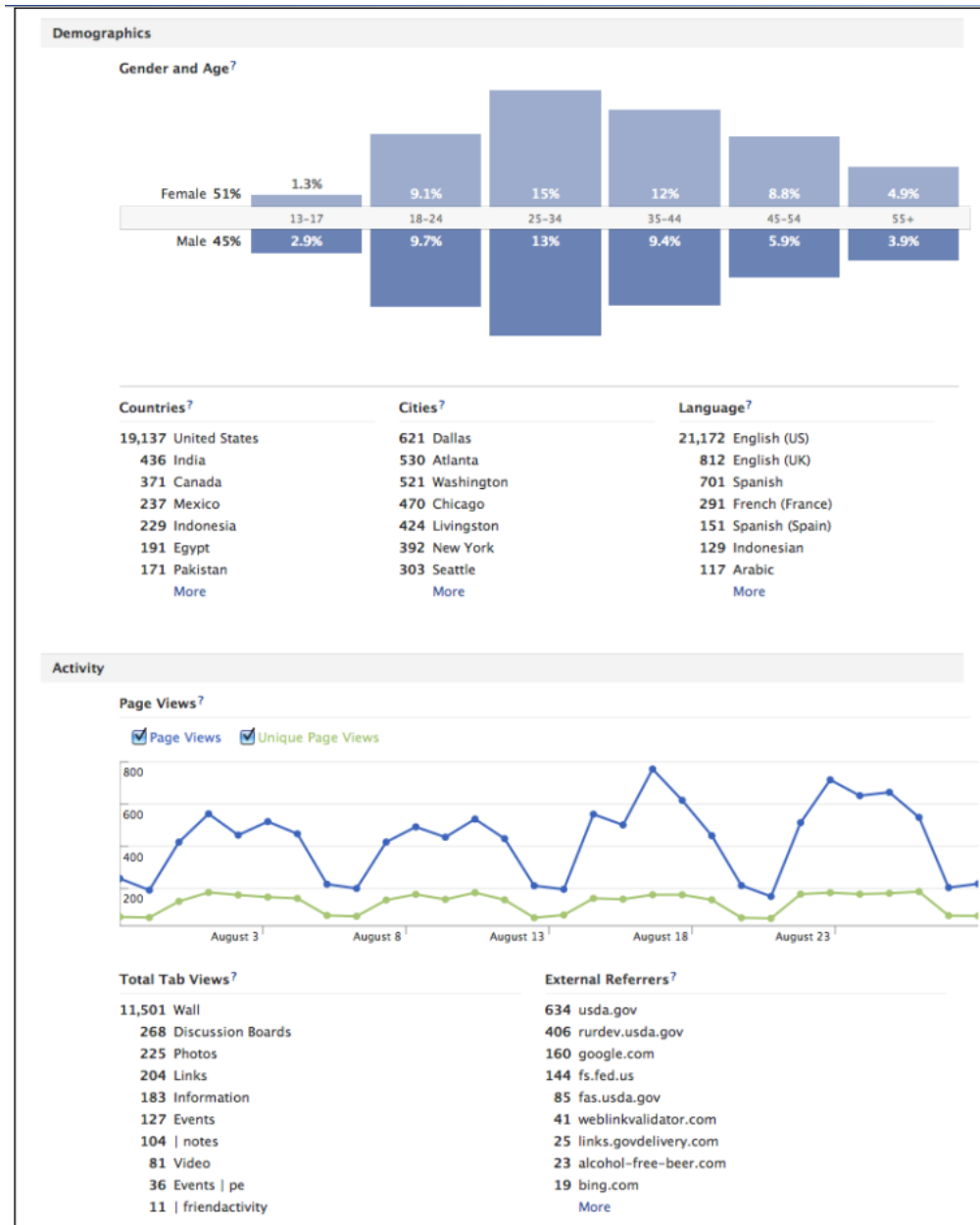
USDA will not collect, maintain, or disseminate PII from individuals who visit the USDA Facebook page.

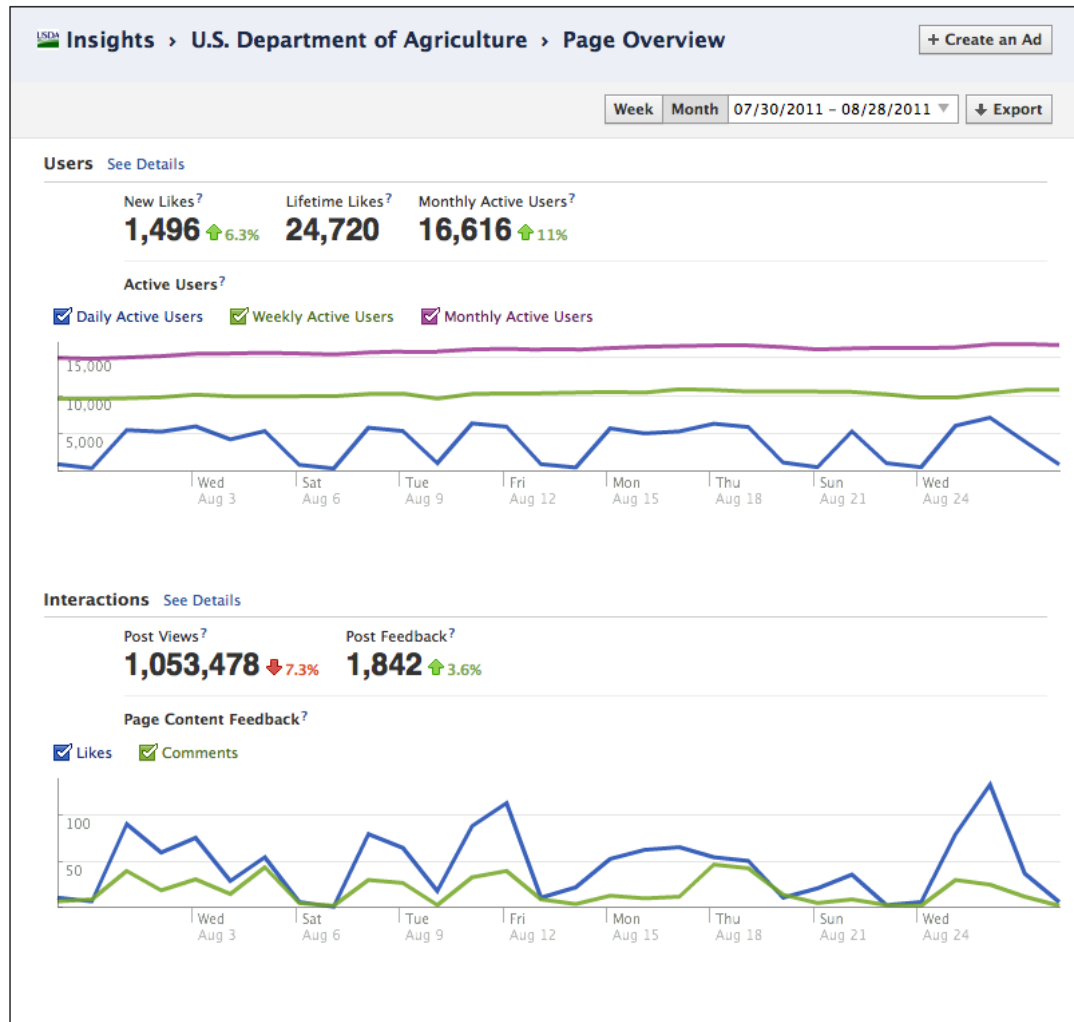
Facebook collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA Facebook page and the interactions

of those visitors with content posted on the site. These metric reports contain aggregate information, but no PII.

## 2.2 What types of tools are used to analyze data and what type of data may be produced?

Facebook Insight is the only tool used to analyze data. Only aggregate metric data will be produced. See examples of data analytics below.



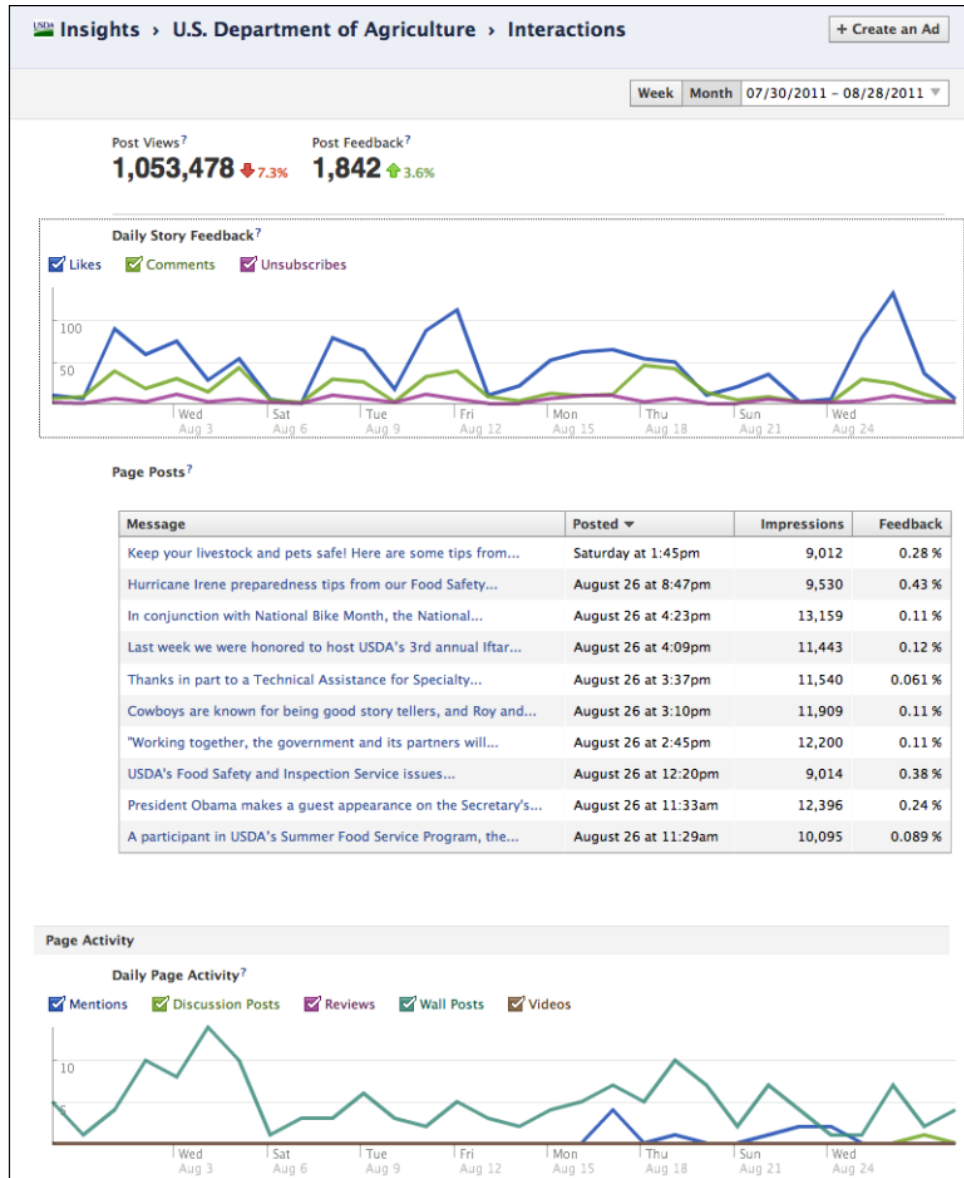


**2.3 If the system uses commercial or publicly available data please explain why and how it is used.**

OC Facebook collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA Facebook page and the interactions of those visitors with content posted on the site. These metric reports contain aggregate information, but no PII.

Facebook Insights provide USDA Facebook page administrators with metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. USDA staff to evaluate and refine communication strategies and identify popular content uses these reports, which do not contain any PII. See example below.





**2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

USDA does not collect any PII from individuals who visit the USDA Facebook page. Facebook Insights provides USDA Facebook page administrators with metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. USDA staff use Insights to evaluate and refine communication strategies and identify popular content uses these reports, which do not contain any PII.

## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 How long is information retained?

USDA currently retains information posted by Facebook visitors. USDA is in the process of drafting a social media records retention schedule. Additionally, we are awaiting guidance on social media records retention for social media channels. While this document is being developed, we have screen shots of all deleted comments that were in violation of the official USDA Comment policy since we launched the Facebook page.

### 3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

USDA is in the process of drafting a social media records retention schedule, based on guidance in NARA Bulletin 2011-02 (<http://www.archives.gov/records-mgmt/bulletins/2011/2011-02.html>); USDA is awaiting guidance on social media records retention for social media channels.

### 3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Although USDA is in the process of drafting a social media records retention schedule, USDA believes the risk to be minimal for two reasons. First, no PII is collected. Second, the site administrator will remove any content that does not meet the comment policy. And, finally the Facebook user controls their privacy settings, and is bound by the Facebook terms of usage.

## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

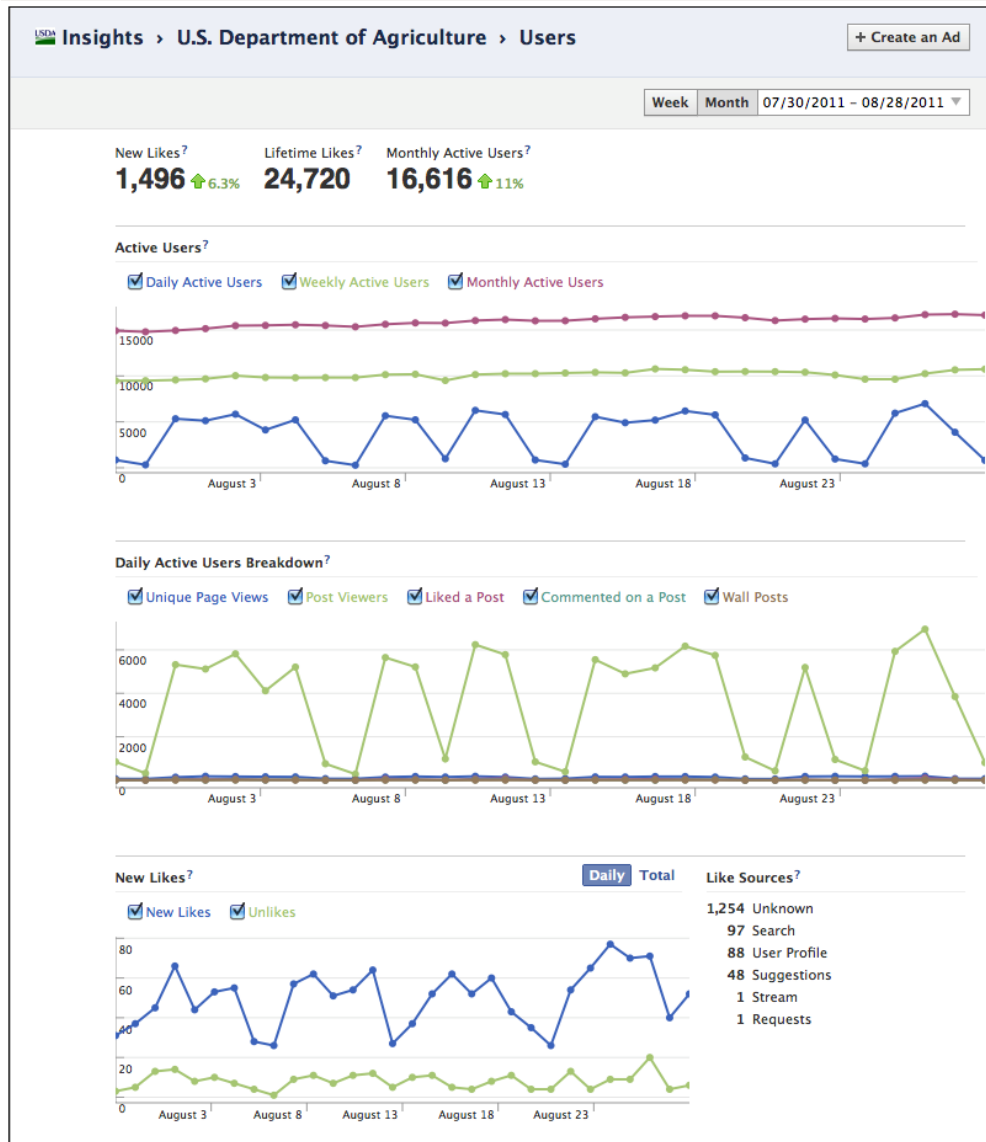
### 4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

Facebook Insights provide USDA Facebook page administrators with metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. USDA staff use Insights to evaluate and refine communication strategies and identify popular content uses these reports, which do not contain any PII. Facebook

Insights are shared with the Office of Communications public affairs team and used to refine our communication strategy for posting more or less of certain types of information based on popularity.

## 4.2 How is the information transmitted or disclosed?

Summary Facebook Insights data are transmitted through internal reports and meetings. See an example of Insights report below:



## 4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

There are minimal to no privacy risks associated with the sharing of Facebook Insights USDA Facebook data. The information shared is aggregated. The aggregate data is used to evaluate and refine USDA's communication strategies and identify popular content.

## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

None.

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

Not applicable

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

Not applicable

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

Given that USDA does not share information with external organizations, there are no privacy risks.

## Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

**6.1 Was notice provided to the individual prior to collection of information?**

USDA does not collect any PII from individuals who visit the USDA Facebook page. The USDA comment policy posted on the USDA Facebook page provides notice to the individual to protect their privacy by not providing PII on the Facebook site.

## **6.2 Do individuals have the opportunity and/or right to decline to provide information?**

Individuals who register with Facebook are required by Facebook to provide a first name, last name, valid email, password, sex, and date of birth, and have the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Facebook user's privacy settings, the department will not collect, disseminate, or maintain any of this information. Individuals control any other information that they may decide to publish on Facebook.

USDA advises users on the Facebook Info page: To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as name, Social Security number, phone numbers, addresses, or e-mail addresses in the body of your comment. If you do voluntarily include personally identifiable information in your comment, such as your name, it may not be posted. (<http://www.facebook.com/USDA?sk=info>)

## **6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

Information provided by individuals on their personal pages is maintained by Facebook and subject to their terms of use.

## **6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

USDA advises users on the Facebook Info page: To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as name, Social Security number, phone numbers, addresses, or e-mail addresses in the body of your comment. If you do voluntarily include personally identifiable information in your comment, such as your name, it may not be posted. (<http://www.facebook.com/USDA?sk=info>)

USDA does not collect any PII from individuals who visit the USDA Facebook page.

# **Section 7.0 Access, Redress and Correction**

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

## **7.1 What are the procedures that allow individuals to gain access to their information?**

Individuals control their information and privacy settings of their Facebook profile page, and can remove their comments or “likes” at any time.

**7.2 What are the procedures for correcting inaccurate or erroneous information?**

Individuals can remove comments or “likes” at any time by updating the information on Facebook.

**7.3 How are individuals notified of the procedures for correcting their information?**

The Facebook terms of use provides the individual with procedures for correcting their information.

**7.4 If no formal redress is provided, what alternatives are available to the individual?**

The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook’s privacy policy and/or direct their inquiries to Facebook.

**7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook’s privacy policy and/or direct their inquiries to Facebook.

## **Section 8.0 Technical Access and Security**

The following questions are intended to describe technical safeguards and security measures.

**8.1 What procedures are in place to determine which users may access the system and are they documented?**

Facebook is a publicly available tool such that users and non-users can view content at any time.

**8.2 Will Department contractors have access to the system?**

Facebook is a publicly available tool such that users and non-users can view content at any time. USDA's page administrators are verified, added and removed by OC/WCD and include agency public affairs or web staff.

**8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

All USDA employees, including those identified as administrators who post USDA information to the USDA Facebook page, complete annual privacy and data security training.

**8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

*Not applicable.*

**8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

The USDA does not own or control access to Facebook. OC/WCD staff determines which agency public affairs and web staff members have access to administer the USDA Facebook page for the purpose of disseminating approved Department and agency information.

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

The USDA Facebook page does not collect PII from the individual. Individuals who register with Facebook are required to provide a first name, last name, valid email, password, sex, and date of birth, and have the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Facebook user's privacy settings, the department will not collect, disseminate, or maintain any of this information. Individuals control any other information that they may decide to publish on Facebook.

USDA advises users on the Facebook Info page: To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as name, Social Security number, phone numbers, addresses, or e-mail addresses in the body of your comment. If you do voluntarily include personally identifiable information in your comment, such as your name, it may not be posted. (<http://www.facebook.com/USDA?sk=info>).

The USDA does not own or control access to Facebook. OC/WCD staff determines which agency public affairs and web staff members have access to administer the USDA

Facebook page for the purpose of disseminating approved Department and agency information.

## Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

### 9.1 What type of project is the program or system?

USDA uses the Facebook page, a popular social networking tool, to share and promote information that is already cleared and available on USDA and agency websites. This information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.

### 9.2 Does the project employ technology, which may raise privacy concerns? If so please discuss their implementation.

The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook's privacy policy and/or direct their inquiries to Facebook.

## Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

### 10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 "Guidance for Online Use of Web Measurement and Customization Technology" and M-10-23 "Guidance for Agency Use of Third-Party Websites and Applications"?

The System Owner is a commercial entity and may or may not have reviewed OMB memoranda M-10-22 and M-10-23. The OC ISSPM has reviewed M-10-22 and M-10-23.

### 10.2 What is the specific purpose of the agency's use of 3<sup>rd</sup> party websites and/or applications?



USDA uses the Facebook page, a popular social networking tool, to share and promote information that is already cleared and available on USDA and agency websites. This information includes, but is not limited to, published USDA Blog content (<http://blogs.usda.gov>), news releases or statements, public events and online resources that are available on USDA and agency websites.

**10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

Individuals who register with Facebook are required to provide a first name, last name, valid email, password, sex, and date of birth, and have the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Facebook user’s privacy settings, the department will not collect, disseminate, or maintain any of this information. Individuals control any other information that they may decide to publish on Facebook.

USDA does not collect, disseminate, or maintain PII from individuals who visit or “like” the USDA Facebook page.

USDA advises users on the Facebook Info page: To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as name, Social Security number, phone numbers, addresses, or e-mail addresses in the body of your comment. If you do voluntarily include personally identifiable information in your comment, such as your name, it may not be posted. (<http://www.facebook.com/USDA?sk=info>).

**10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or “like” the USDA Facebook page.

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or “like” the USDA Facebook page.

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or “like” the USDA Facebook page.

**10.7 Who will have access to PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or "like" the USDA Facebook page.

**10.8 With whom will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or "like" the USDA Facebook page.

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

USDA does not collect, disseminate, or maintain PII from individuals who visit or "like" the USDA Facebook page.

**10.10 Does the system use web measurement and customization technology?**

Facebook Insights provide USDA Facebook page administrators with metric reports that include aggregate information such as the number of visitors to the pages and the content they are viewing. USDA staff use Insights to evaluate and refine communication strategies and identify popular content uses these reports, which do not contain any PII.

Facebook collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA Facebook page and the interactions of those visitors with content posted on the site. These metric reports contain aggregate information, but no PII.

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook's privacy policy, terms or use and/or direct their inquiries to Facebook.



**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

The USDA does not collect PII from individuals who register with Facebook or who may visit the USDA Facebook page.

The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook's privacy policy, terms or use and/or direct their inquiries to Facebook.

## **Responsible Officials**

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Amanda Eamich  
Director of Web Communications  
Office of Communications  
United States Department of Agriculture

## **Approval Signature**

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Wayne Moore  
Chief Information Officer  
Office of Communications  
United States Department of Agriculture



**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

The USDA does not collect PII from individuals who register with Facebook or who may visit the USDA Facebook page.

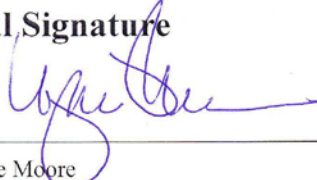
The USDA does not own or control access to Facebook. Individuals who seek information about how privacy concerns are addressed in the technology employed by Facebook should review Facebook's privacy policy, terms or use and/or direct their inquiries to Facebook.

**Responsible Officials**



\_\_\_\_\_  
Amanda Eamich  
Director of Web Communications  
Office of Communications  
United States Department of Agriculture

**Approval Signature**



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Wayne Moore  
Chief Information Officer  
Office of Communications  
United States Department of Agriculture