

# Privacy Impact Assessment

Technology, Planning, Architecture, & E-Government

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

**October 5, 2011**

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## Abstract

The Office of Communications administers the official USDA YouTube 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 YouTube page can be accessed online by users and non-users of YouTube at: <http://www.youtube.com/usda>.

## Overview

- The Office of Communications, Creative Media and Broadcast Center (OC/CMBC), manages USDA's official YouTube page. OC/CMBC uploads approved video content to the YouTube site.
- The USDA YouTube page is part of the Department's overall communication and outreach effort to ensure the public is aware of various programs, policies and events. YouTube provides the public with a convenient and familiar venue for produced multi-media content such as weekly video features or coverage of official USDA events or activities. The USDA YouTube page is used to promote USDA information and resources to individuals who use the video-sharing site and who may not be regular visitors to the USDA and agency websites.
- Video content published to the USDA YouTube page will be previously approved by relevant Department and Office of Communications leadership, and will be available in the public domain. Information includes, but is not limited to, videos produced by OC/CMBC such as weekly features or special videos, as well as video content produced by agency public affairs or video professionals.
- OC/CMBC administers the USDA YouTube page. OC/CMBC staff will not use the official account for any personal purpose, such as sending YouTube emails, commenting on videos or pages or accepting or sending friend requests. USDA staff may, on behalf of the Department, "like" other government and official partner YouTube channel pages.
- USDA YouTube channel is monitored by USDA's Social Media team in OC's Web Communications Staff. Comments on the channel page may be deleted if they are in violation of the USDA comment policy. The comment policy is posted on the USDA YouTube information page as well as the USDA website. All deleted comments are maintained as screen shots in a Word document for records management purposes. Per our comment policy [[http://www.usda.gov/comment\\_policy.xml](http://www.usda.gov/comment_policy.xml)], we will not allow and will delete comments that make personal attacks, are far off-topic, promote services or products, contain abusive, profane or vulgar language, contain sexual content, overly graphic, disturbing, obscene or offensive material, or material that would otherwise violate the law if published here, include offensive language targeting

specific ethnic or racial groups. 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.

- USDA does not collect information about visitors, commenters or friends of the USDA YouTube channel. Administrators only share video content that is in the public domain.
- USDA may use aggregate information provided by YouTube Insight 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 YouTube 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 YouTube are required by YouTube to provide a valid email, password, 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 YouTube user's privacy settings, the department will not collect, disseminate, or maintain any of this information.

YouTube collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA YouTube 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 YouTube page to share video content information that is cleared and in the public domain.

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

YouTube 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 YouTube privacy settings.

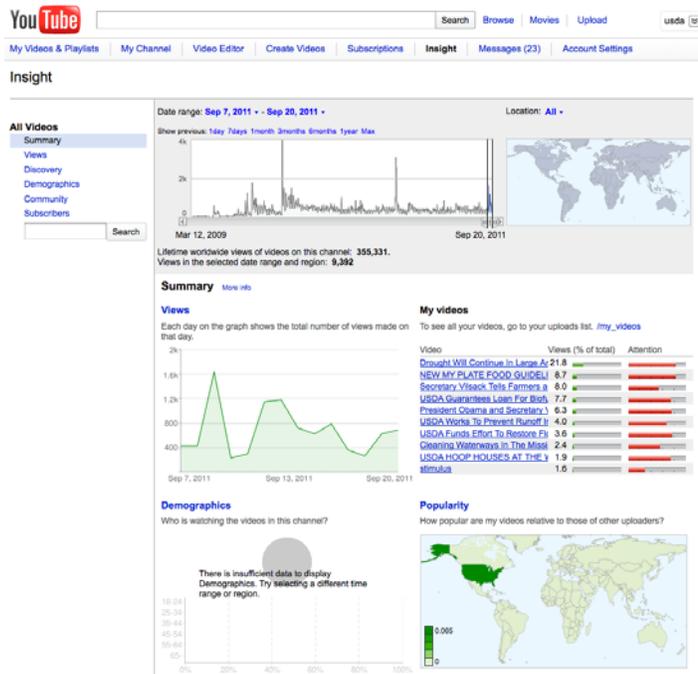
USDA uses the YouTube page to share video content information that is cleared and in the public domain.

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

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

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

YouTube Insight provide USDA YouTube page administrators with metric reports that include aggregate information such as the number of visitors to the channel and the content they are viewing (see below). 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 YouTube 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 “friend” the USDA YouTube page. USDA staff do not check the accuracy and timeliness of any information posted as a comment by the YouTube user.

Information shared on the USDA YouTube page is already cleared for accuracy prior to publication.

#### **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 YouTube 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 YouTube page.

Because only select number of OC staff has access to the USDA YouTube 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, YouTube’s privacy policy applies to information any individual provides on the USDA YouTube 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 YouTube prohibits the appearance of third party advertisements on the official USDA YouTube 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 YouTube page, by “friending” or commenting on videos 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 YouTube 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 YouTube page to share information that is already cleared prior to publication, and available in the public domain. Information includes, but is not limited to, videos produced by OC/CMBC such as weekly features or special videos, as well as video content produced by agency public affairs or video professionals.

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

YouTube collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA YouTube 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?

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

YouTube Insights provide USDA YouTube 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 YouTube channel. YouTube Insights provides USDA YouTube 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 does not retain information posted by YouTube 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 YouTube page.

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

No, 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.

**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 YouTube user controls their privacy settings, and is bound by the YouTube terms of usage.

## **Section 4.0 Internal Sharing and Disclosure**

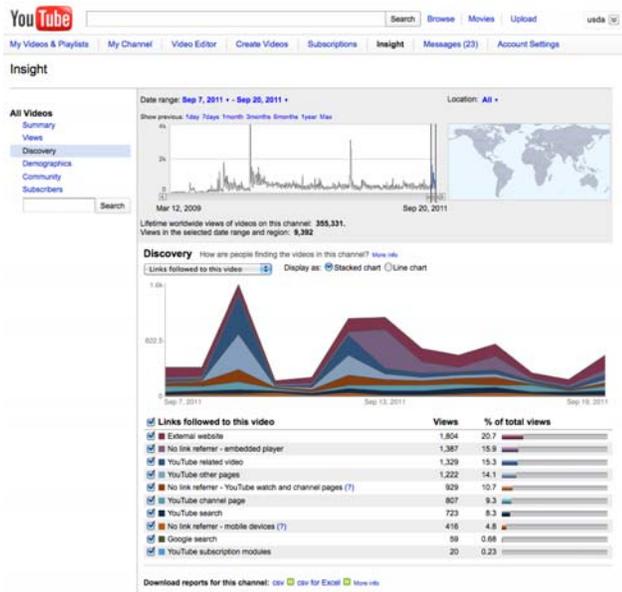
The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

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

YouTube Insights provide USDA YouTube channel 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. YouTube 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 YouTube 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 YouTube Insights USDA YouTube data. The information shared is aggregated. The aggregate data is used 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 YouTube page. The USDA comment policy posted on the USDA YouTube page provides notice to the individual to protect their privacy by not providing PII on the YouTube site.

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

Individuals who register with YouTube are required by YouTube to provide a valid email, password, 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 YouTube 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 YouTube.

USDA advises users on the YouTube About Me information section: 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.

**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 YouTube 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 YouTube “About Me” information section: 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.

USDA does not collect any PII from individuals who visit the USDA YouTube 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 YouTube profile page, and can remove their comments or “friend” 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 YouTube.

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

The YouTube 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 YouTube. Individuals who seek information about how privacy concerns are addressed in the technology employed by YouTube should review YouTube’s privacy policy and/or direct their inquiries to YouTube.

**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 YouTube. Individuals who seek information about how privacy concerns are addressed in the technology employed by YouTube should review YouTube's privacy policy and/or direct their inquiries to YouTube.

## **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?**

YouTube 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?**

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

**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 YouTube channel, 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 YouTube. OC/CMBC staff determines which personnel have access to administer the USDA YouTube 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 YouTube page does not collect PII from the individual. Individuals who register with YouTube are required to provide a 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 YouTube 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 YouTube.

USDA advises users on the YouTube "About Me" information section: 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.

The USDA does not own or control access to YouTube. OC/CMBC staff determines which staff members have access to administer the USDA YouTube channel 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 YouTube channel, a popular video-sharing tool, to share and promote information through videos that is already cleared and in the public domain. Information includes, but is not limited to, videos produced by OC/CMBC such as weekly features or special videos, as well as video content produced by agency public affairs or video professionals.

**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 YouTube. Individuals who seek information about how privacy concerns are addressed in the technology employed by YouTube should review YouTube's privacy policy and/or direct their inquiries to YouTube.

## 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 YouTube page, a popular video-sharing tool, to share and promote information that is already cleared and in the public domain. Information includes, but is not limited to, videos produced by OC/CMBC such as weekly features or special videos, as well as video content produced by agency public affairs or video professionals.

### **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 YouTube are required to provide a 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 YouTube 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 YouTube.

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

USDA advises users on the YouTube “About Me” information section: 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.

### **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 YouTube 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 YouTube 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 “friend” the USDA YouTube channel.

**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 “friend” the USDA YouTube channel.

**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 “friend” the USDA YouTube channel.

**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 “friend” the USDA YouTube channel.

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

YouTube Insights provide USDA YouTube 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.



YouTube collects web log files to create user metric reports that include aggregate information, such as the number of visitors to the USDA YouTube 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 YouTube. Individuals who seek information about how privacy concerns are addressed in the technology employed by YouTube should review YouTube's privacy policy, terms or use and/or direct their inquiries to YouTube.

**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 YouTube or who may visit the USDA YouTube page.

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



## Responsible Officials

A handwritten signature in black ink, appearing to read "Garth Clark", written over a horizontal line.

Garth Clark  
Director, CMBC  
Office of Communications  
United States Department of Agriculture

## Approval Signature

A handwritten signature in black ink, appearing to read "Wayne Moore", written over a horizontal line.

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