

Department of the Interior
Privacy Impact Assessment

April 12, 2011

Name of Project: Livestream
Bureau: Department of the Interior
Project's Unique ID (Exhibit 300): N/A

A. CONTACT INFORMATION:

Departmental Privacy Office
Office of the Chief Information Officer
U.S. Department of the Interior
202-208-1605
DOI_Privacy@ios.doi.gov

B. SYSTEM APPLICATION/GENERAL INFORMATION:

- 1) Does this system contain any information about individuals** *{this question is applicable to the system and any minor applications covered under this system}?*

Yes, information identifiable to individuals may be present within the Livestream application.

- a. Is this information identifiable to the individual¹** *{this question is applicable to the system and any minor applications covered under this system}?* (If there is NO information collected, maintained, or used that is identifiable to the individual in the system, Sections D through G can be marked not applicable. If YES complete all sections for system and any applicable minor applications).

Yes, live videos, feedback, comments and/or chat entries posted on Livestream may contain information identifiable to individuals.

- b. Is the information about individual members of the public** *{this question is applicable to the system and any minor applications covered under this system}?* (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

Yes, live videos, feedback, comments and/or chat entries posted on Livestream may contain information identifiable to individual members of the public.

- c. Is the information about employees** *{this question is applicable to the system and any minor applications covered under this system}*? (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes, live videos, feedback, comments and/or chat entries posted on Livestream may contain information that is identifiable to individual employees.

2) What is the purpose of the system/application?

Livestream is an online live streaming video application operated by a third party which allows users to view and broadcast interactive live video content and participate in live chat sessions. Livestream allows users to upload, share, and view live videos. Such services may also accept feedback and comments to video messages, or allow “embedding” of videos on other sites, such as .gov sites. Livestream also allows for social media integration, including live chat among viewers and participants. The social media functions are not core to the webcast function.

DOI uses Livestream to broadcast live videos of its mission related activities, to promote Departmental programs, and enhance public outreach and government transparency. The primary account holder is the Department of the Interior Office of Communications, who ensures information posted on the Department’s official Livestream page is appropriate and approved for public dissemination. Using Livestream allows DOI to reach a much wider audience and greatly increases the visibility of DOI activities and operations.

3) What legal authority authorizes the purchase or development of this system/application?

Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, Dec. 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 USC 1401; OMB Circular A-130; 110 Departmental Manual 18, 110 Departmental Manual 5.

C. DATA IN THE SYSTEM:

1) What categories of individuals are covered in the system?

Livestream users, including members of the general public, private organizations and Federal employees.

2) What are the sources of the information in the system?

Sources of information are Livestream users world-wide, including members of the general public, Federal employees, private organizations and Federal, Tribal, State and Local agencies, who broadcast live videos, feedback, comments and/or chat entries on DOI's official Livestream page. Official live videos and information posted by DOI on Livestream is also available on DOI official websites.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Sources of information are Livestream users, including members of the general public, private organizations and Federal employees; however, DOI does not collect, maintain, or disseminate PII from Livestream users. The official live videos and information posted by DOI has been reviewed and approved for public dissemination and is also available on DOI official websites.

b. What Federal agencies are providing data for use in the system?

No other Federal agencies are providing data for use in Livestream. Other Federal agencies may utilize Livestream to disseminate live videos of agency activities and operations to enhance communication and government transparency; however, DOI does not receive PII or other information from Federal agencies through the use of Livestream.

c. What Tribal, State and local agencies are providing data for use in the system?

Tribal, state and local agencies may utilize Livestream to disseminate live videos of agency activities and operations; however, DOI does not receive PII or other information from these agencies through the use of Livestream.

d. From what other third party sources will data be collected?

None. DOI does not receive PII or other information from third party sources through the use of Livestream.

e. What information will be collected from the employee and the public?

If a member of the public posts a comment on DOI's Livestream page, their User ID, image, or other identifiable information contained in feedback or comments may become available to DOI. The Department does not collect or share PII from Livestream users, except in circumstances where there is evidence of criminal activity, a threat to the government or the public, or when an employee violates DOI policy. This information may include User ID, image or posted content, and the appropriate law enforcement organizations will be notified.

Livestream users are subject to Livestream's privacy and security policies and terms of use, and can set their own privacy settings to protect their personal information. DOI does not control the content or privacy policy on Livestream, or Livestream's use of user information. DOI's Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also informs

the public that they may be subject to third party privacy policies when they leave a DOI official website to link to third party social media web sites.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOI records be verified for accuracy?

DOI does not collect PII data from Livestream users, thus does not verify any data for accuracy. Official live videos and information posted by DOI on Livestream are reviewed and approved for public dissemination prior to posting.

b. How will data be checked for completeness?

DOI does not check data posted by Livestream users for completeness. Official live videos and information posted on Livestream by DOI are reviewed and approved for public dissemination prior to posting.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

DOI does not collect PII data from Livestream users, thus does not ensure the data is current. Official live videos and information posted by DOI on Livestream are reviewed and approved for public dissemination prior to posting.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

DOI does not collect PII from Livestream users, thus data elements related to such information are not described in detail and documented.

D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes, DOI uses Livestream to distribute live videos and information on mission related activities and operations and to enhance communication and government transparency which is relevant to the purpose of the Livestream social media application.

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

DOI does not collect, maintain or disseminate PII from Livestream users, and does not aggregate data on individual Livestream users.

3) Will the new data be placed in the individual's record?

No, DOI does not collect, maintain or disseminate PII from Livestream users.

4) Can the system make determinations about employees/public that would not be possible without the new data?

No, DOI does not collect, maintain or disseminate PII from Livestream users.

5) How will the new data be verified for relevance and accuracy?

DOI does not collect, maintain or disseminate PII from Livestream users, thus data is not verified for relevance and accuracy.

6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

Livestream is a third party social media website that is available to the general public and is accessible by all users. DOI does not collect, maintain or disseminate PII from Livestream users, and does not consolidate data.

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

DOI is not consolidating processes and does not collect, maintain or disseminate PII from Livestream users.

8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Data will not be retrieved as DOI does not collect, maintain or disseminate information from Livestream users. However, if a member of the public submits feedback, comments and/or chat entries from their use of Livestream, their User ID or contact information may become available and used to provide additional information. Also, there may be cases where there is evidence of criminal activity, a threat to the government or the public, or an employee violates DOI policy. This information may include User ID, feedback, comments, chat entries, and the appropriate law enforcement organizations will be notified.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

Reports on individuals will not be generated.

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

Livestream users can decline to provide information, generally via regular system and privacy settings, and can control access to their personal information, or by not posting videos or comments. However, the provision of information and user consent applies only to terms of use for Livestream. DOI has no control over Livestream content and privacy settings, and does not collect any PII from Livestream users.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) What are the retention periods of data in this system?

DOI does not collect, maintain or disseminate PII from use of Livestream. Any information posted on Livestream, including DOI's official Livestream page, is subject to Livestream's privacy, security and records policies, and DOI has no control over the management of such information. However, as part of its public outreach effort, DOI posts live videos on Livestream regarding its mission-related activities and operations, which may be subject to Federal records requirements. DOI has submitted a social media records schedule to the National Archives and Records Administration for approval. The social media records schedule is for the management of general electronic records of official information postings published by DOI, and includes various activities that integrate web technology, social interaction and user-generated content. The records disposition is temporary, and records are destroyed when no longer needed for agency business. However, pending NARA approval, all records are treated as permanent.

2) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Disposition of paper records includes shredding, burning and tearing, and electronic records are degaussed in accordance with 384 DM1.

3) How does the use of this technology affect public/employee privacy?

Affect on public/employee privacy is minimal as DOI does not collect, maintain, or disseminate any PII from Livestream users. DOI does broadcast live videos on its mission-related activities and operations on Livestream. The official information posted by DOI has been reviewed and approved for public dissemination so any privacy risks for the unauthorized disclosure of personal data by the Department is mitigated. DOI does not have any control over personal information posted by individual Livestream users, including members of the general public and Federal employees.

Livestream users are subject to Livestream's privacy policy and terms of use, and can set their own privacy settings to protect their personal information. DOI does not control the content or privacy policy on Livestream. DOI's Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also informs the public that they may be subject to third party privacy policies when they leave a DOI official website to link to third party social media web sites.

4) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

DOI published DOI-08, Social Networks System of Records Notice (SORN), for referrals for criminal activity, threats to the government or the public, and to enable DOI Bureaus or Offices to implement public outreach programs associated with third party social media applications that may contain User IDs and/or contact information and result in the creation of a Privacy Act system of records. However, DOI does not collect, maintain or disseminate PII from the use of Livestream.

5) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A - DOI published DOI-08 Social Networks System of Records Notice on July 22, 2011.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Livestream users set their own privacy settings to allow access to their data. Potentially, all Livestream users could have access to information posted on Livestream, including the general public, Federal employees, private organizations, and Federal, State, Tribal and local agencies. DOI has official Livestream pages and has the same access to data as other Livestream users. DOI has no control over user settings or content, and does not collect, maintain or disseminate PII from Livestream.

2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access to data is determined by the Livestream user when establishing their privacy settings. The privacy settings and policy are governed and controlled by Livestream. DOI has no control over access controls in Livestream. DOI videos and information posted on DOI's official Livestream page may be accessed by all Livestream users; however, official postings are reviewed and approved for public dissemination.

3) Will users have access to all data on the system or will the user's access be restricted? Explain.

Within Livestream, users control access to their own PII, generally via system settings. DOI has the same access as any other Livestream user dependent on individual user privacy settings. DOI has no control over user content in Livestream, except for official DOI postings. DOI does not collect, maintain or disseminate PII from the use of Livestream. DOI videos and information posted on DOI's official Livestream page may be accessed by all Livestream users; however, official postings are reviewed and approved for public dissemination.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

Within Livestream, users control access to their own PII, generally via system settings. DOI has the same access as any other Livestream user dependent on individual user privacy settings. DOI has no control over user content in Livestream, except for official DOI postings. DOI's Social Media Policy and Guidebooks address the official and unofficial (personal) use of third party social media and social networking services by DOI employees, and provides guidance on the appropriate posting and content of information.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Livestream is a private, third-party website that is independently operated. DOI does not have a part in the development or maintenance of Livestream.