

**Department of the Interior
Privacy Impact Assessment**

April 25, 2011

Name of Project: Twitter
Bureau: Department of the Interior
Project's Unique ID (Exhibit 300):

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. Twitter is a social networking and micro-blogging service that allows individuals to send short text messages called "tweets" to their friends or "followers," which may contain information identifiable to individuals; however, DOI does not collect or maintain PII from use of the Twitter application.

- a. Is this information identifiable to the individual**¹ *{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, tweets posted on Twitter 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).

Yes, tweets posted on Twitter may contain information identifiable to individual members of the public.

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).

- 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, tweets posted on Twitter may contain information that is identifiable to individual employees.

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

Twitter is a free social networking and micro-blogging service that enables users to send and read messages called tweets. Tweets are text-based communications, or posts, of up to 140 characters, which may contain abbreviated text and URLs. Tweets are displayed on the author's page and delivered to the author's subscribers who are known as followers. Senders can restrict delivery to those in their circle of friends or allow open access. Tweets can be sent and received via the Twitter website, Short Message Service (SMS) or compatible external applications. Twitter generally contains an accessible, limited log of past messages, as well as limited user-data. Twitter allows users to communicate with individuals or groups, albeit in short bursts.

The Department of the Interior utilizes Twitter to communicate and engage with the public, to disseminate information, provide update on major public events. For example, DOI may use Twitter to provide the public with up to date and real time information about natural disasters, such as earthquakes, floods, and volcanoes, or provide period updates on the progress of recovery projects to help the public understand how the projects help local economies and small businesses. Official information posted on Twitter is also available on DOI official websites. Use of Twitter also allows public affairs and communications officials monitor public feedback on DOI programs or key issues, which can help DOI dispel misinformation and help the public gain a better understanding of DOI mission-related activities.

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?

Twitter users include members of the general public and Federal employees, and may include private organizations and Federal, Tribal, State and Local agencies.

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

The Department of the Interior disseminates information and provides updates on major public events and natural disasters. This official information posted on Twitter is also available on DOI official websites. Sources of information available to DOI are Twitter users, including members of the public and Federal employees, who post comments and profile information on the official DOI Twitter page.

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?

Any information available to DOI through Twitter is posted by individual users, including members of the general public and Federal employees, and may include private organizations and other Federal, Tribal, State, or Local agencies.

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

No other Federal agencies are providing PII for use in Twitter. Federal agencies may utilize Twitter to enhance communication or disseminate information; however DOI does not receive PII or other data from Federal agencies through the use of Twitter.

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

Tribal, State and local agencies may utilize Twitter to disseminate information and enhance communication; however, DOI does not receive PII or other information from these agencies through the use of Twitter.

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

None.

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

Username, profile images, and other identifying information contained in the content of tweets may become available through tweets posted by Twitter users. However, DOI does not collect, maintain or disseminate PII from use of Twitter. There may be instances where there is evidence of criminal activity, a threat to the government or the public, or an employee violates DOI policy and is referred for disciplinary action. This information, including username, profile image and content, will be turned over to the appropriate law enforcement organizations.

Twitter users are subject to Twitter's security and privacy policies, and must consent to Twitter's collection and use of information, such as name, username, password and email address, in order to register and use the Twitter service. Additional information collected by Twitter may include picture, biography, location coordinates, IP address, and metadata associated with tweets. Users can control access to personal information and location information through account settings. DOI does not control Twitter privacy policy, use of information or content of tweets, and does not request, collect, maintain or disseminate personal information from Twitter. 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 or maintain PII from use of Twitter and does not verify data for accuracy. Official information posted by DOI on Twitter is reviewed and approved for public dissemination prior to posting.

b. How will data be checked for completeness?

DOI does not check data posted on Twitter for completeness. Official mission-related information posted on Twitter is 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 or maintain PII from use of Twitter, and does not ensure data posted on Twitter is current. Official information posted by DOI on Twitter is 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?**

N/A - DOI does not collect, maintain or disseminate data on individuals from use of Twitter.

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?**

DOI does not collect or maintain data on individuals. DOI uses Twitter to enhance communication with the public and disseminate information.

- 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?**

No, DOI does not collect, maintain or disseminate data about individuals from use of Twitter.

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

DOI does not collect, maintain or disseminate data about individuals from use of Twitter.

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

DOI does not collect, maintain or disseminate data on individuals from use of Twitter.

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

N/A - DOI does not collect, maintain or disseminate data on individuals from use of Twitter.

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

DOI does not collect, maintain or disseminate PII from use of Twitter, so no data is being consolidated.

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

N/A - No processes are being consolidated.

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.

DOI does not retrieve data on individuals. DOI does not collect, maintain or disseminate PII on individuals from use of Twitter. However, information provided by Twitter users, including usernames and content, may be turned over to appropriate law enforcement organizations as a result of evidence of criminal activity, threat to the government or the public, or employee violation of DOI policy.

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

DOI does not generate reports on individuals from use of Twitter.

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.)

Twitter users can decline to provide information prior to registration and use of Twitter, and can control access to the personal information they choose to make public in the Twitter system through normal SaaS user-level administrative controls and account settings. However, the provision and use of information provided applies only to Twitter, DOI has no control over Twitter privacy policy, or Twitter use and collection of information, and does not request or collect PII from individual use of Twitter.

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 Twitter. Any information posted on Twitter, including DOI's official Twitter page, is subject to Twitter's privacy, security and records policies. However, as part of its public outreach effort, DOI disseminates information through postings on Twitter regarding its mission-related activities, 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?

Approved disposition of paper records or hard copy media includes shredding, burning and tearing, and electronic records are degaussed in accordance with Office of the Secretary social media records schedule 1408 and 384 DM1.

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

DOI use of Twitter has a minimal affect on public/employee privacy as DOI does not collect, maintain, or disseminate any PII from Twitter. However, DOI does disseminate information

on its mission-related activities on Twitter, which 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 Twitter users, including members of general public and Federal employees.

Twitter users are subject to Twitter's privacy policy and terms of use, and can set their account settings to protect their personal information. DOI does not control the content, use, or privacy policy on Twitter. 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 has developed DOI-08, Social Networks System of Records Notice, which is expected to be published in May 2011, 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 usernames, photos, geographical data, and/or contact information, and result in the creation of a Privacy Act system of records. DOI does not actively collect, maintain or disseminate PII from the use of Twitter.

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

N/A

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)

DOI has official Twitter pages and has the same access to data in Twitter as other Twitter users, including members of the general public, Federal employees, private organizations, and Federal, Tribal, State and local agencies. DOI has no control over user account settings or content of tweets, and does not collect, maintain or disseminate PII from use of Twitter. Twitter users are subject to Twitter's privacy policy for collection and use of user information, and may set their account settings to limit access to personal information.

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 Twitter privacy policy and user account settings, both of which are governed and controlled by Twitter. DOI has no control over access restrictions, account settings, Twitter's policy on the collection and use of user information, or Twitter's security controls.

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

Twitter users can set their account settings to control access to their personal information. DOI has no authority or control over access restrictions, account settings, user information,

Twitter privacy policy or security controls. DOI only has control over official information posted on DOI's official Twitter page. DOI has the same access to tweets as any other Twitter user.

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)

Twitter users can set account settings to control access to their personal information, and are subject to Twitter's privacy policy on the collection and use of individual information. DOI has no control over access restrictions, account settings, user information, Twitter privacy policy, or security controls. DOI has the same level of access to tweets as any other Twitter user. 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?

Twitter is a third party independently operated software as a service application. DOI does not have a part in the development or maintenance of Twitter and does not provide remuneration of any kind.