



Privacy Impact Assessment
for

ED Youth Voice Facebook Fan Page

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1. System Information. Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

ED Youth Voice Facebook Fan Page ("the Facebook Page") is a page on Facebook that will provide an additional channel for the U.S. Department of Education ("ED") to reach out to high school and college students. Facebook is a social networking website that is operated and privately owned by Facebook, Inc. Users can add friends, send those messages, and updates their personal profiles to notify friends about themselves. While Facebook is an external website, the Facebook Page will be controlled by ED. The Facebook Page will provide information to visitors, permit comments, and respond to comments when applicable.

ED will provide an ED e-mail address on the Facebook Page for Facebook Members to send their contact information to. The contact information sent to ED by Facebook members will be housed in a database on an ED computer system ("the Database"). The Database will be managed for the purpose of informing the Facebook Members about happenings in ED and ED-sponsored events near the members.

2. Legal Authority. Cite the legal authority to collect and use this data. What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

ED has authority through 20 U.S.C. Section 3412(e) (2) to perform public information functions, including the provision, through the use of the latest technologies, of useful information about education and related opportunities to students, parents, and communities.

Additionally, any user visiting the Face book Page is doing so entirely voluntarily. Therefore, any information displayed is provided voluntarily by users.

Users who provide their information to be included in the Database do so voluntarily.

3. Characterization of the Information. What elements of personally identifiable information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)? What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

The Facebook Page has been developed to provide an additional delivery method for ED information. Visitors to the Facebook Page will be given an ED e-mail address so that they have the option to message ED with contact information for themselves in order to receive further information about youth engagement activities. This information will be stored on an ED database. Content that ED places on the Facebook Page will not contain any PII. There is a space for users to provide comments on a "Wall", which is a text box that allows the user to post a comment on another user's personal page. Users can also use the "send a message" function to send a message to another user, or users can send an e-mail to the ED employee in charge of the ED Youth Voices Facebook page. Members of the Facebook Page also can post videos, comments, and photos. User-provided information that is displayed on the Facebook Page may or may not contain PII. For example, accessing the Facebook Page requires one to have his or

her own Facebook Page. This individual page has a location to display a name and photo. Some individuals may choose to list their real names and load clear photos of them. Other individuals may choose to list false names and may load unclear (unidentifiable) photos. Either way information is voluntarily submitted with the intent to explore shared interests.

Individuals who visit and join the Facebook Page are already registered members of Facebook before they join. Information is voluntarily contributed by persons to Facebook after they register as members, and their intent is to share the information with others in the network.

ED prominently discourages the posting of PII on the Facebook Page and posts a notice that the Facebook page is monitored and any PII or inappropriate postings will be deleted. ED will post a notice that any PII that is sent to ED will be maintained by ED.

No universal characterization of the kinds of PII that might be posted by members over the course of their interactions with the Facebook Page can be provided in this Privacy Impact Assessment. The extent of PII revealed by members is completely at their discretion. ED will post an ED e-mail address for members so that they can send contact information to be included on the Database. ED will request the following PII for inclusion in the Database: name, school, city, state, and e-mail address.

4. Why is the information collected? How is this information necessary to the mission of the program, or contributes to a necessary agency activity? Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.

The privacy risk from loss or exposure of the information on the Facebook Page is negligible. Any PII posted by the member after registration is done willingly and is presumed to be "public" among the user's friends in the network or the network's entire community. ED has prominently posted a notice on the Facebook Page that informs users that any posting can be reviewed by any other user, and warns them not to post any sensitive personal information.

Generally speaking, harm to the reputation of an agency can be vulnerabilities on matters of information privacy and security. However, in the context of an agency's presence on social networks, reputational risk does not arise from information privacy concerns but rather from the potential for false inferences about the agency because of statements that might be posted by members. ED has made the judgment that reticence risk (the risk of not gaining the mission benefits from social networking) outweighs any reputational risk. ED will monitor content posted by members and appropriately exercise its prerogative to remove PII or inappropriate content.

ED collects and stores information on the Database to inform Facebook Users who request additional information about upcoming events in their areas and about updates to ED policies and news. This activity is relevant to the mission of the Office of Communications and Outreach.

5. Social Security Number (SSN) - If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures. Also specify any alternatives that you

considered, and why the alternative was not selected. If system collects SSN, the PIA will be signed signature by the Assistant Secretary or designee.

Social Security Numbers are not collected on the Facebook Page, and if SSNs are posted against the specific instruction not to do so, they will be deleted immediately upon discovery. Social Security Numbers are not solicited for collection in the Database, and will not be kept in the Database, even if they are provided by members.

6. Uses of the Information. What is the intended use of the information? How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.

ED created the Facebook Page to provide a new channel for ED to broadcast its core messages and provide a space where high school and college students can find information and express their ideas about ED policies. The page will feature:

- Regular (perhaps daily) updates on youth engagement within ED (e.g., speaking engagements, meetings, etc.).
- Video produced by ED, media organizations, and television shows.
- Links to newspaper stories, magazine articles, and blog post that feature the Secretary of Education.
- Photos taken by ED and newspaper photographers.
- Text of speeches related to, but not limited to, youth and youth programs.

Any information provided voluntarily will be reviewed for PII and appropriateness. It will also be used to obtain feedback from users about the Facebook Page, the information provided, and ED's programs. No automated methods such as data mining, pattern analysis, or record scoring will be used by ED. If a member of the Facebook Page would like to receive information about a youth engagement initiative, such as the schedule of National Youth Listening Tour dates or other ED initiatives, and sends an electronic message to the ED e-mail address provided on the Facebook page, then ED will include the member's contact information in the Database in order to provide the requested information to the member.

7. Internal Sharing and Disclosure. With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared?

Any ED employee can become a member of the Facebook Page and can view posted content and videos. The information posted to the Facebook Page will be shared internally on a need-to-know basis for the purpose of, but not limited to, anecdotes for external and internal communications.

PII stored in the Database will only be shared or disclosed within ED on a need-to-know basis.

8. External Sharing and Disclosure. With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)? What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?

Any individual in the public who joins a social network can view comments posted by others to the extent allowed by the originator using the revelation features of the social network. ED will also disclose posted content if required to do so by law; to respond to claims that any content violates the right of third parties; or to protect the rights, property, or personal safety of ED or the public. Otherwise it will not be collected or shared.

PII stored in the Database will not be shared with or disclosed to an external entity without the written consent of the individual to whom the information pertains unless ED is required to do so by law or to protect the rights, property, or personal safety of ED or the public.

9. Notice. Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)? What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?

A notice will be placed prominently on the page that ED discourages the posting of PII on the Facebook Page and that the Facebook page is monitored and any PII or inappropriate postings will be deleted.

Participation in and posting on the Facebook Page is voluntary. If a user posts a comment and then changes his/her mind, the comment may be deleted by the user at any time.

An ED e-mail address will be posted on the Facebook Page and a clear notice will be posted indicating that if a Facebook User wishes to receive further information from ED and to be included in a list-serve (Database) that the User should send name, school, city, state, and e-mail address in an electronic message to the indicated address. Sending PII to ED is voluntary, and it will be posted that the information will be solely used to communicate to Facebook Users about ED happenings, and will not be shared with third parties without the written consent of the individual to whom the information pertains unless ED is required to do so by law or to protect the rights, property, or personal safety of ED or the public.

10. Web Addresses.

<http://www.facebook.com/pages/Washington-DC/ED-Youth-Voices/136786839692361>

11. Security. What administrative, technical, and physical security safeguards are in place to protect the PII? Examples include: monitoring, auditing, authentication, firewalls,

etc. Has a Certification and Accreditation (C&A) been completed? Is the system compliant with any federal security requirements? If so, which federal security requirements?

Security safeguards are described within the terms of use published by the Social Media Networks. Facebook is a non-Federally operated and controlled Web site whose activities controlled by external organizations not under the control of the Federal Government. ED provides clear and conspicuous notice in a prominent location at the point of dissemination that Facebook is controlled and operated by a third party and is not a Federal or agency Web site. The Facebook Page provides a link to the Facebook privacy policy, and ED directs individuals to www.ed.gov, where the same content, as well as the agency's own privacy policy, may be obtained electronically.

ED will house and maintain the Database on an ED secure computer system in ED headquarters and it will be protected with cyber-security software and hardware.

12. Privacy Act System of Records. Is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a? Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?

Because the Facebook Page is not a System of Records under the Privacy Act, a System of Records Notice is not required.

The Database also is not a System of Records under the Privacy Act; so a SORN is not required. The Database will not be used to identify individuals.

13. Records Retention and Disposition. Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes – provide records schedule number:

The subject records consist of incoming email and email data extracts entered into a database. Email records are retained in accordance with General Records Schedule 20, Item 1(b) and are deleted when data have been entered into the master file or database and verified, or when no longer required to support reconstruction of, or serve as backup to, a master file or database, whichever is later. Database records are retained in accordance with General Records Schedule 23, Item 7 and destroyed when no longer needed for reference purposes.