

Privacy Impact Assessment

Technology, Planning, Architecture, & E-Government

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Privacy Impact Assessment for the USDA Twitter Account

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Abstract

The U.S. Department of Agriculture uses Twitter, a microblogging website and content dissemination tool, to share information with the public. The Office of Communications administers the official USDA Twitter account, while agencies manage Twitter accounts focused on their specific mission and available information. This PIA is being conducted to evaluate privacy risks through use of this channel.

The USDA's Twitter page can be publicly accessed at: <http://www.twitter.com/usda>. A director of approved agency and program accounts can be found on the USDA website at: <http://www.usda.gov/newmedia>.

Overview

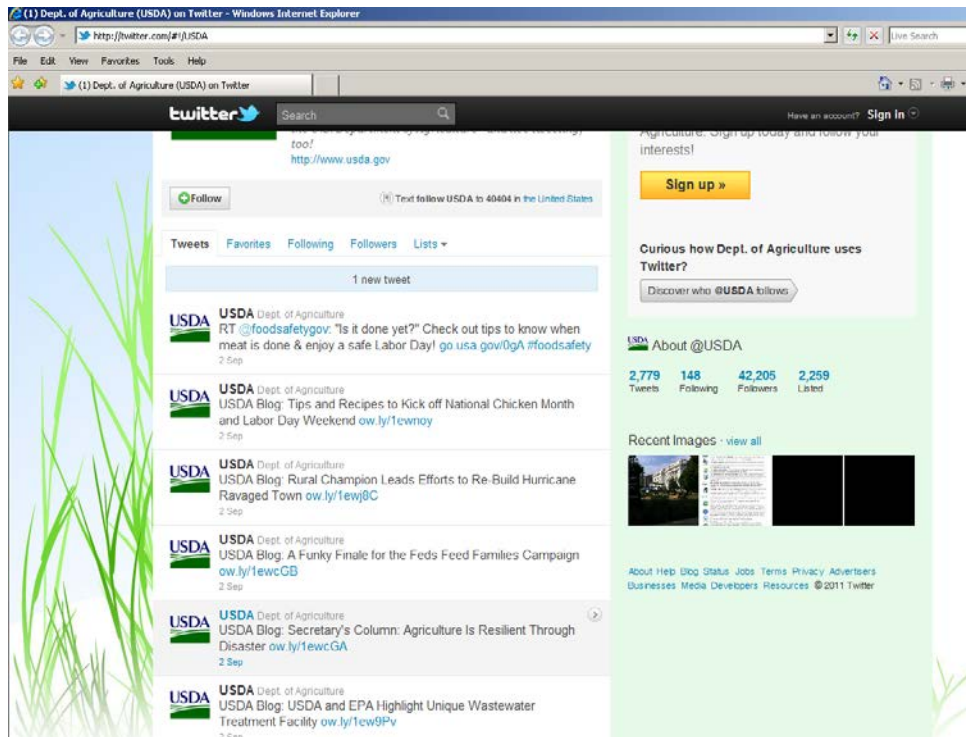
The Department of Agriculture manages the Department's primary Twitter account, "@USDA." Agencies and offices may also have their own Twitter accounts that cater more specifically to their individual mission and audiences.

USDA Twitter accounts allow the Department to promote information, tips and resources to consumers and organizations that may not be regular visitors to the USDA and agency websites. Information, or "tweets", posted through the USDA Twitter account will be content that already exists on the USDA or agency websites, or other cleared and approved material. This content may include, but is not limited to, Press Releases, blogs, quotes from speeches made by the Secretary and Deputy Secretary (also known as live-tweeting), photos and other approved and publicly available information.

Through USDA Twitter accounts, the Department promotes resources and information to the public. Individuals can view the USDA Twitter stream whether or not they have Twitter accounts or "follow" the USDA account. Twitter users who "follow" the account will receive posted information in their own Twitter feed called the "timeline. Users can share USDA content with their own network of self-selected Twitter followers, which further contributes to the Department's outreach and communication efforts.

USDA Twitter accounts do not use Direct Messages. These are private messages between registered Twitter users who follow each other's account. Additionally, USDA Does not send direct messages, as we use other means of communication with federal colleagues and official partners.

USDA intends to only follow other government agencies and official partners. USDA does not collect information about users who follow, mention or "retweet" information shared by the Department.



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 does not intend to collect, maintain, or disseminate personally identifiable information (PII) from individuals who visit or follow the USDA Twitter accounts. Twitter requires that individuals who wish to become registered users provide their first name, last name, a valid email address, and a password, with the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Twitter user's privacy settings, the Department does not intend to collect, disseminate, or maintain any of this information.

USDA may, however, read, review, or rely upon information that individuals make available to the public or to the USDA on Twitter, including Tweets that may mention @USDA. Office of Communications, Web Communications Division (OC/WCD) staff routinely monitors USDA-related keywords on Twitter and other third-party applications in an effort to determine the what kind of public attention the USDA is generating online.

Tweets that OC/WCD may collect or maintain as part of such review may elect to include Twitter handles in the following instances:

- * Twitter handles of news organizations, journalists, and influential blogs and bloggers may be collected and distributed for use in daily news clips to lend credibility to Tweets;
- * Use of Twitter handles may be collected and maintained as an official record during interactive Twitter chats hosted or contributed to by the USDA.

In the instances listed above, the USDA intends to keep a record of the information in the form of an internal report document, but does not intend to collect or maintain the records in any type of database from which the records will be retrieved specifically by Twitter handle.

USDA will share information that is publicly available on USDA or agency websites, in addition to other cleared and approved material. This content may include, but is not limited to, Press Releases, blogs, quotes from speeches made by the Secretary and Deputy Secretary (also known as live-tweeting), photos and other approved and publicly available information.

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

Twitter collects PII from individuals who register with them and who may ultimately visit or indicate that they “follow” USDA Twitter accounts. The USDA does not, however, intend to collect, maintain, or disseminate that information. The FTC may collect or maintain Twitter handles in internal reports as explained in Section 1.1.

USDA intends to use Twitter to disseminate information that is publicly available on USDA or agency websites, in addition to other cleared and approved material. This content may include, but is not limited to, Press Releases, blogs, quotes from speeches made by the Secretary and Deputy Secretary (also known as live-tweeting), photos and other approved and publicly available information.

Occasionally, the USDA may choose to Retweet or share other publicly available information for other government agencies or official partners.

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

Individuals who want to become registered users of Twitter must provide PII to Twitter. The USDA does not, collect, maintain, or disseminate that information, except for the use of Twitter handles as noted above in Section 1.1.

1.4 How is the information collected?

The USDA does not, collect, maintain, or disseminate that information, except for the use of Twitter handles as noted above in Section 1.1.

1.5 How will the information be checked for accuracy?

OC/WCD and the Office of Communications Press Officer manage the official USDA Twitter accounts to ensure accuracy before posting each Tweet. Information shared on USDA Twitter accounts is already cleared for accuracy and available on USDA and agency managed 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 Twitter.

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

The types of PII available to USDA through Twitter are generally limited in scope (e.g., screen name, information posted by users, no PII about visitors), so the privacy risk is similarly limited. Information collected from Twitter will generally not be associated with a Twitter handle except as identified in Section 1.1, to avoid the maintenance by the USDA of any PII about individual Twitter users.

A separate risk is that the USDA's Twitter accounts could be used in an unauthorized manner to disseminate PII improperly, even if the USDA does not collect any PII from users or visitors through Twitter. To mitigate the risk of unauthorized dissemination, only a select number of Office of Communications staff will have administrative access to the account. In addition, the information disseminated will be cleared and approved before it is posted, to mitigate any risk that information, including PII that is not appropriate for public dissemination will be posted.

There are other privacy risks that are not within the control of the USDA and that the Department has limited ability to mitigate. Third party advertisements for example may pose privacy risks in the form of cookies or malware to those individuals who click on them. The USDA's terms of service with Twitter prohibit the appearance of third-party advertisements on USDA Twitter accounts, however, thus eliminating those risks. The USDA, however, cannot control the risk of other ads on Twitter, called "Promoted Tweets," which Twitter may appear on other users' pages and in searches. Twitter may also track and collect other information or data about user activities, such as links clicked or viewed, which would be governed by Twitter's privacy policy and is outside the USDA's control.

There is also a risk that individual users will reveal PII or other sensitive information about themselves or others in their Tweets, including those that may also appear on the USDA's stream or other users' streams. Users may also include links that may adversely affect those who click on them (such as links to malicious software or to websites marketing a fraudulent business opportunity). Under Twitter's privacy policy, any information in a user's Tweets is going to be public unless the user opts to make his or her profile private.

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.

The USDA does not intend to collect, use, disseminate, or maintain PII from individuals who visit or indicate that they "follow" the USDA Twitter account. Twitter handles may be collected as described in Section 1.1.

The USDA and all registered Twitter users will be able to see the provided names of those individuals who indicate that they "follow" USDA Twitter accounts, as well as any other information those individuals have decided to make available via their Twitter account. The USDA may read, review, or rely upon information that individuals make available to the public or to the USDA on Twitter, including mentions of @USDA or responses to posted information. As previously noted earlier, some Tweets may be collected for internal reporting use to monitor trends, but will not be collected in conjunction with a Twitter handle except as noted in Section 1.1, which could identify individuals.

The USDA will use Twitter to disseminate information and resources as part of the Department's overall communication and outreach efforts. Information will be publicly available information and include, but is not limited to, press releases, speeches, photos, and videos.

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

USDA may use tools available to monitor trends and traffic generated as a result of information shared through Twitter. Twitter management and analytics tools or other web applications available online may also be used to monitor relevant USDA keywords on Twitter. (Such monitoring applications are outside the scope of this Twitter PIA, as they do not make any additional PII available to the USDA, so no PIA is required for those applications.)

Such data provides insights to the use and potential impact of information distributed through Twitter. This data is used for internal reporting to evaluate the effectiveness of USDA communication and outreach efforts. Please see the figure below.



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

Twitter management and analytics tools or other web applications available online may also be used to monitor relevant USDA keywords on Twitter. (Such monitoring applications are outside the scope of this Twitter PIA, as they do not make any additional PII available to the USDA, so no PIA is required for those applications.) Please see the figure below for an example.

Hunger Twitter Chat with Undersecretary Kevin Concanannon
Conducted a Twitter Chat with Under Secretary Kevin Concanannon and ABC's Dr. Bresser as well as Feeding America. Used the hashtag #abcDrBchat to track questions and responses. The hashtag received 368 mentions in just 24 hours with a spike at 1:15pm, as the 1pm twitter chat continued.

Highlights from the chat include:
@USDA: A1 14.4% (17.4 mln) US households were food insecure at some time in 2009. This = 50.2 mln people incl 17.2 mln children #hunger #abcDrBchat
15 retweets including Mid Ohio Food Bank, The BiPartisan Policy Center, Grandview Avenue Farmers Market in Columbus and other hunger and nutrition stakeholders

Significant Retweets:
@drcharibesser: Incredible! A1 MT @USDA: A1 14.4% (17.4 mil) households were food insecure some time in '09. 50.2 mln people (17.2 mil kids) #abcDrBchat
@DanChildsABC: RT @USDA: A1 14.4% (17.4 mln) US households were food insecure at some time in 2009. This = 50.2 mln ppl incl 17.2 mln children #abcDrBchat

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.

The USDA does not intend to collect, use, disseminate, or maintain PII from individuals who visit or indicate that they “follow” the USDA Twitter account. Twitter handles may be collected as described in Section 1.1.

Additionally, other tools that USDA may use to monitor trends and effectiveness are outside the scope of this Twitter PIA as they do not make additional PII available to the USDA, so no PIA is required for those applications.

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?

The USDA does not intend to collect, use, disseminate, or maintain PII from individuals who visit or indicate that they “follow” the USDA Twitter account. Twitter handles may be collected as described in Section 1.1, as well as internal reports presenting trends and use of information shared through USDA Twitter accounts.

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.

However, USDA does not intend to collect, use, disseminate or maintain PII from individuals who visit or indicate that they “follow” the USDA Twitter account.

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

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. However, USDA does not intend to collect, use, disseminate or maintain PII from individuals who visit or indicate that they “follow” the USDA Twitter account.

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?

USDA may use tools available to monitor trends and traffic generated as a result of information shared through Twitter. Twitter management and analytics tools or other web applications available online may also be used to monitor relevant USDA keywords on Twitter. (Such monitoring applications are outside the scope of this Twitter PIA, as they do not make any additional PII available to the USDA, so no PIA is required for those applications.)

Trends and other aggregate data, such as number of Retweets or mentions of a USDA-related keyword, may be compiled as a report and shared internally.

Such data provides insights to the use and potential impact of information distributed through Twitter. This data is used for internal reporting to evaluate the effectiveness of USDA communication and outreach efforts.

4.2 How is the information transmitted or disclosed?

Summary Twitter trends and aggregate data are transmitted through internal reports and meetings.

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.

USDA may use tools available to monitor trends and traffic generated as a result of information shared through Twitter. However, such monitoring applications are outside the scope of this Twitter PIA, as they do not make any additional PII available to the USDA and do not pose privacy risks.

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?

Individuals who want to become registered users of Twitter must provide PII to Twitter. Twitter users determine what information is available about them to other Twitter users and to the general public (i.e., external entities) in accordance with Twitter’s policies and terms of use. USDA does not have access to any more information than any member of the public about other Twitter users and does not control or have the ability to provide access to any user’s PII. Individuals who seek information about how Twitter uses their PII should review Twitter’s terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>).

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

Twitter, not USDA, determines what information Twitter collects from an individual, and whether there is an opportunity or right not to provide that information, in order to obtain an account and become a registered user. By contrast, Twitter does not request or require any personal information from an individual who simply visits Twitter and views the USDA public Twitter profiles or Tweets (or any other public profile or Tweets), although Twitter may automatically maintain their own administrative log data (e.g., time, date, visitors’ Internet Protocol (IP) address) about such visits, as Twitter explains in its privacy policy (<http://twitter.com/privacy>), which cannot be declined.

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

See Section 6.2, and Twitter’s privacy policy (<http://twitter.com/privacy>).

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.

Privacy risks are not applicable to the USDA. Twitter’s privacy policy and terms of service address potential privacy risks, if any, when users establish, use and access their Twitter accounts. To mitigate the risk of unauthorized access to individual accounts, Twitter requires registered users to log in using their Twitter handle or email address, and password.

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 Twitter profile page. Twitter requires registered users to enter their login ID (i.e., Twitter handle or email address) and password at the Twitter home page to gain access to their Twitter account and change or update their account information, and USDA has no control over this process.

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

Individuals manage information posted on their own profile page. Twitter users can delete posted tweets from their own timeline. USDA has no control over or involvement in this process.

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

The USDA does not own or control access to Twitter. Individuals who seek information about how privacy concerns are addressed in Twitter technology employed by Twitter should review Twitter's privacy policy and/or direct their inquiries to Twitter. Twitter notifies users when their policy is modified or changed.

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

The USDA does not own or control access to Twitter. Individuals who seek information about how privacy concerns are addressed in Twitter technology employed by Twitter should review Twitter's privacy policy and/or direct their inquiries to Twitter. Twitter notifies users when their policy is modified or changed.

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 Twitter. Individuals who seek information about how privacy concerns are addressed in Twitter technology employed by Twitter should review Twitter's privacy policy and/or direct their inquiries to Twitter. Twitter notifies users when their policy is modified or changed.

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?

Twitter is a publicly available tool such that users and non-users can view content at any time. To mitigate the risk of unauthorized dissemination, only a select number of OC staff will have administrative access to the account.

8.2 Will Department contractors have access to the system?

Twitter is a publicly available tool such that individuals may view content at any time. The Office of Communication manages the USDA Twitter account, and only a select number of OC staff will have administrative access to the account.

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 support Twitter accounts, 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 Twitter and information shared on the website. To mitigate the risk of unauthorized dissemination, only a select number of OC staff will have administrative access to the account, and all information posted will be cleared and approved prior to use.

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?

Individuals who register with Twitter are required to provide PII, such as name and e-mail address. The USDA does not own or control access to Twitter, and does not collect information except as described in Section 1.1. OC staff who support USDA Twitter accounts share information that is already cleared and approved, publicly available on USDA or agency websites.

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 Twitter as part of the department's communication and outreach efforts to disseminate information to the public. 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 Twitter. Individuals who seek information about how privacy concerns are addressed in the technology employed by Twitter should review their terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>), or contact Twitter directly.

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 3rd party websites and/or applications?

USDA uses Twitter as part of the department's communication and outreach efforts to disseminate information to the public. 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 3rd party websites and/or applications.

USDA does not intend to collect, maintain, or disseminate personally identifiable information (PII) from individuals who visit or follow the USDA Twitter accounts. Twitter requires that individuals who wish to become registered users provide their first name, last name, a valid email address, and a password, with the option to provide additional information. Even though some of this information may be accessible to the USDA, depending on a Twitter user's privacy settings, the Department does not intend to collect, disseminate, or maintain any of this information.

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

The USDA does not own or control access to Twitter. Individuals who seek information about how privacy concerns are addressed in the technology employed by Twitter should review their terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>), or contact Twitter directly.

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

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

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

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

10.6 Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically?

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

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

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

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

USDA does not collect, disseminate, or maintain PII from individuals who visit Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd 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 Twitter, follow or mention @USDA, except for the limited uses as described in Section 1.1.

10.10 Does the system use web measurement and customization technology?

USDA may read, review, or rely upon information that individuals make available to the public or to the USDA on Twitter, including Tweets that may mention @USDA. Office of Communications, Web Communications Division (OC/WCD) staff routinely monitors USDA-related keywords on Twitter and other third-party applications in an effort to determine the what kind of public attention the USDA is generating online.

USDA may use tools available to monitor trends and traffic generated as a result of information shared through Twitter. Twitter management and analytics tools or other web applications available online may also be used to monitor relevant USDA keywords on Twitter. (Such monitoring applications are outside the scope of this Twitter PIA, as they do not make any additional PII available to the USDA, so no PIA is required for those applications.)

Such data provides insights to the use and potential impact of information distributed through Twitter. This data is used for internal reporting to evaluate the effectiveness of USDA communication and outreach efforts.

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 Twitter. Individuals who seek information about how privacy concerns are addressed in the technology employed by Twitter should review their terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>), or contact Twitter directly.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd 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 Twitter or who may visit or mention USDA Twitter accounts.

The USDA does not own or control access to Twitter. Individuals who seek information about how privacy concerns are addressed in the technology employed by Twitter should review their terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>), or contact Twitter directly.

Responsible Officials

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Office of Communications
United States Department of Agriculture



Approval Signature

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



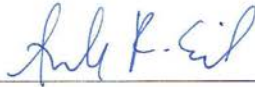
The USDA does not own or control access to Twitter. Individuals who seek information about how privacy concerns are addressed in the technology employed by Twitter should review their terms of service (<http://twitter.com/tos>) and privacy policy (<http://twitter.com/privacy>), or contact Twitter directly.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd 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 Twitter or who may visit or mention USDA Twitter accounts.

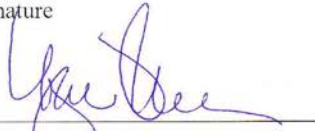
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