



Privacy Impact Assessment  
for the

# Use of Unidirectional Social Media Applications Communications and Outreach

**March 8, 2011**

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## Abstract

Unidirectional social media applications encompass a range of applications, often referred to as applets or widgets,<sup>1</sup> that allow users to view relevant, real-time content from predetermined sources.<sup>2</sup> The Department of Homeland Security (DHS or Department) intends to use unidirectional social media tools including desktop widgets, mobile apps,<sup>3</sup> podcasts,<sup>4</sup> audio and video streams,<sup>5</sup> Short Message Service (SMS) texting,<sup>6</sup> and Really Simple Syndication<sup>7</sup> (RSS) feeds, among others, for external relations (communications and outreach) and to disseminate timely content to the public about DHS initiatives, public safety, and other official activities and one-way notifications. These dynamic communication tools broaden the Department's ability to disseminate content and provide the public multiple channels to receive and view content. The public will continue to have the option of obtaining comparable content and services through the Department's official websites and other official means. This Privacy Impact Assessment (PIA) analyzes the Department's use of unidirectional social media applications. This PIA does not cover users sending content to the Department. Additionally, this PIA will describe the personally identifiable information (PII) and the extremely limited circumstances that the Department will have access to PII, how it will use the PII, what PII is retained and shared, and how individuals can gain access to their PII. Appendix A of this PIA will serve as a listing, to be updated periodically, of DHS unidirectional social media applications, approved by the Chief Privacy Officer, that follow the requirements and analytical understanding outlined in this PIA.<sup>8</sup> The unidirectional social media applications listed in Appendix A are subject to Privacy Compliance Reviews by the DHS Privacy Office.

## Overview

In accordance with the President's Memorandum on Transparency and Open Government (January 21, 2009)<sup>9</sup> and the Director of the Office of Management and Budget's (OMB) Open

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<sup>1</sup> Other names for these applications include, but are not limited to: portlets, gadgets, plasmoids and screenlets. The function specified in the Abstract, rather than the name of a particular vendor or platform uses, serves to specify what a "widget" is.

<sup>2</sup> Applications that can function on any site that accepts external content, including social networks, blog platforms, start pages, desktop platforms, or personal website pages. Widgets can be built to function differently on each platform, delivering varying degrees of integration with a social network, from accessing and using social media data to not interacting with the platform at all.

<sup>3</sup> Same as footnote 2 but received and viewed on a mobile device.

<sup>4</sup> A series of digital media files, either audio or video, that are downloaded directly or are streamed webcasting.

<sup>5</sup> Audio or video files that can begin playing as they are being downloaded.

<sup>6</sup> Text communication service component of phone, web or mobile communication systems, using standardized communications protocols that allow the exchange of short text messages.

<sup>7</sup> A web-content format that alerts users to new content on a website. They enable users to avoid the conventional methods of browsing or searching for information on websites. RSS feeds may be deployed as widgets or as stand-alone applications in web-browsers or other software.

<sup>8</sup> If a component of the Department has an operational need to use unidirectional social media applications that is outside the scope of the requirements and analytical understanding outlined in this PIA, a separate PIA must be written for that component's use of unidirectional social media applications to address the specific privacy concerns that are unique to that initiative for consideration by the Chief Privacy Officer.

<sup>9</sup> President Barack Obama, Memorandum on *Transparency and Open Government* (January 21, 2009), available at <http://www.gpoaccess.gov/presdocs/2009/DCPD200900010.pdf>.



Government Directive Memorandum (December 8, 2009),<sup>10</sup> unidirectional social media applications provide DHS alternative opportunities to disseminate content to the public. These dynamic communications tools provide the public channels to access real-time content and download current content. The Department uses these government and non-government owned applications for external relations (communications and outreach) and to disseminate timely content to the public about DHS initiatives, public safety, and other official activities and notifications. DHS may use these unidirectional applications to inform the public on a range of topics such as: 1) airport security processing; 2) access to and security at federal buildings; 3) man-made and natural disaster preparedness; 4) transportation security; 5) pandemic planning/response; 6) border access and security; and 7) other public safety purposes as appropriate.

DHS uses unidirectional social media applications developed by components and third parties to make relevant content easily available in real-time to members of the public. Widgets function by streaming DHS authorized content to a Graphical User Interface (GUI)<sup>11</sup> and may have a frequent “refresh rate.” Some have static content. Podcasts, another type of unidirectional social media application used by DHS, stream pre-recorded audio files to desktops, PDAs, and other internet-enabled devices. The same is true for RSS feeds and SMS text messages; they are unidirectional conveyors of content. In all cases the user must request that the application or service be initiated on their behalf so that they may receive desired communications from the Department. The Department will only “push” content to individuals by unidirectional social media applications who have subscribed to the particular product used by the Department to distribute official content.

Widgets permit users of website content to separate the content from the website and consume it in other places. For example, users can grab the widget code and drop it in another website and then have content in that widget update dynamically by DHS and automatically republish to any website where it appears. An RSS feed similarly allows the user to subscribe to published content on a website and have it appear in the client-side RSS reader, so the user can get real-time alerts whenever new content is posted to the website where the RSS feed resides. Podcasts and video-streams are audio and video feeds that typically are hosted on another server, either at DHS or with a third-party provider, may contain an embedded feature where the user can insert the code to appear in multiple websites from the same source. The distributed environment of these tools is largely responsible for the experience of allowing content to spread quickly across the Internet or “go viral.” At the same time it allows the content creator to have good controls over the original content so that it is updated once and appears many times in many places.

Unidirectional social media applications may be developed by the Department or owned by third parties not affiliated with DHS. However, the government may place content on these third party websites or applications as long as the same content is available on a Department website. These

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<sup>10</sup> OMB Memorandum M-10-06, *Open Government Directive* (December 8, 2009), available at [http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-06.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-06.pdf).

<sup>11</sup> A type of user interface that allows users to interact with programs in more ways than just computers such as: hand-held devices such as MP3 players, portable media players or gaming devices; household appliances and office equipment with images rather than text commands. A GUI offers graphical icons, and visual indicators, as opposed to text-based interfaces, typed command labels or text navigation to fully represent the information and actions available to a user.



unidirectional social media applications continue to grow in numbers and capability. Because of the depth and diversity of this reach, the Department is planning for the use of a multitude of unidirectional social media applications.

In many cases, the owners of the widgets used or developed by DHS to distribute official content do not require the user to create an account as a condition for accessing content. In the event that the widget owner requires a user account the user may be required to provide PII which will be transmitted to the widget owner and may be displayed to the user during any subsequent interactions with the widget. Some unidirectional social media applications run on an individual user's GUI and require specific information about the device and PII about the user in order to function correctly. For example, an application might require a user to input certain preferences including technical information and PII in order to customize the display of the application. A widget used to alert users about local emergencies, for instance, will ask for the individual to provide a zip code in order to provide geographic information relevant to the a specific location. The individual is not required to provide his actual zip code, only the information to enable DHS to provide the user with geographically specific content. DHS will not have access to the user preferences or technical device information. The Department will access and use unidirectional social media applications using only DHS-owned network assets.

It is imperative that the Department be transparent about its use of unidirectional social media applications to avoid concerns about government intrusion. The Department will engage in the use of unidirectional social media applications in a manner that protects privacy and respects the intent of users. In order to address these and other concerns, DHS has set forth specific requirements in this PIA regarding how the Department may use unidirectional social media applications in a privacy sensitive way. In advance of using unidirectional social media applications for purposes of distributing DHS content where the following applies, DHS shall:

- 1) Examine the privacy policy of the application owner and the application itself, if one is available, to evaluate the risks and to determine whether the application is appropriate for the Department's use;
- 2) Make available a privacy notice on the unidirectional social media application itself prior to using it as a distribution channel for DHS content;<sup>12</sup> and
- 3) Unless otherwise directed by statute, executive order, or regulation the Department's public affairs officials will serve as the primary account holders for all unidirectional social media applications hosted on third party sites across the Department and will manage and approve all DHS content disseminated through these public-facing applications. All content sent through official Department applications must be approved by the Department's public affairs officials prior to its dissemination.<sup>13</sup> The

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<sup>12</sup> OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), available at [http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-23.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-23.pdf).

<sup>13</sup> The Secretary's Efficiency Review, Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive available at [http://dhsconnect.dhs.gov/policies/Efficiency\\_Review\\_Materials/90\\_ER\\_-\\_DHS\\_Communications\\_-final\\_guidance\\_intranet.pdf](http://dhsconnect.dhs.gov/policies/Efficiency_Review_Materials/90_ER_-_DHS_Communications_-final_guidance_intranet.pdf).



Department's public affairs officials will ensure that all disseminated content falls within the appropriate requirements for publicly available content and materials. OPA will, when necessary, act as the final authority on what content is acceptable for posting. Additionally, official DHS unidirectional social media applications will be identified by the Department's seal, when technologically possible.

When using approved unidirectional social media applications for purposes of distributing DHS content where the following applies, DHS shall:

- 1) Not require subscribers to provide PII to DHS as a condition of receiving content via unidirectional social media applications;
- 2) Establish user names easily identifiable as DHS accounts; and
- 3) Label/tag unidirectional social media applications with an official DHS logo.

This PIA outlines the Department's use of unidirectional social media applications and their intended use for external relations (communications and outreach) and as a means to disseminate timely content to the public about DHS initiatives, public safety, and other official activities. On September 16, 2010, the Department published a PIA on the Use of Social Networking Interactions and Applications (Communications/Outreach/Public Dialogue). Neither PIA is not intended to cover other social media activity such as monitoring initiatives, law enforcement and intelligence activities, and other similar operations. For more information on the Department's use of social media, visit [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

## Section 1.0 Authorities and Other Requirements

### 1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The President's Transparency and Open Government Memorandum<sup>14</sup> (January 21, 2009) and the OMB Director's Open Government Directive Memorandum<sup>15</sup> (December 8, 2009) directs federal departments and agencies to harness new technologies to engage the public and serve as one of the primary authorities motivating the Department's efforts to utilize unidirectional social media applications.

The Secretary of Homeland Security's Efficiency Review,<sup>16</sup> Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive requires all

<sup>14</sup> President Barack Obama, Memorandum on *Transparency and Open Government* (January 21, 2009), available at <http://www.gpoaccess.gov/presdocs/2009/DCPD200900010.pdf>.

<sup>15</sup> OMB Memorandum M-10-06, *Open Government Directive* (December 8, 2009), available at [http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-06.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-06.pdf).

<sup>16</sup> The Secretary's Efficiency Review, Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive available at [http://dhsconnect.dhs.gov/policies/Efficiency\\_Review\\_Materials/90\\_ER\\_-\\_DHS\\_Communications\\_-\\_final\\_guidance\\_intranet.pdf](http://dhsconnect.dhs.gov/policies/Efficiency_Review_Materials/90_ER_-_DHS_Communications_-_final_guidance_intranet.pdf).



Departmental unidirectional social media applications to be coordinated with OPA, unless otherwise directed by statute, executive order, or regulation.

When using those unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of unidirectional social media applications, the Department will only receive PII if it is viewable through a public profile, if one exists.

Authorities supporting the Department's use of unidirectional social media applications include:

- A. 6 U.S.C. § 112, "Secretary; functions;"
- B. 6 U.S.C. § 142, "Privacy Officer;"
- C. 5 U.S.C. § 301, the Federal Records Act;
- D. 5 U.S.C. § 552a, the Privacy Act of 1974;
- E. Section 208 of the E-Government Act of 2002;
- F. The President's *Memorandum on Transparency and Open Government*, January 21, 2009;
- G. *The OMB Director's Open Government Directive Memorandum*, December 8, 2009;
- H. OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications*, June 25, 2010;<sup>17</sup>
- I. OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, April 7, 2010;<sup>18</sup>
- J. The Secretary's Efficiency Review, Section III, Office of Public Affairs Cross-Component Coordination Task Force Directive;

As a result of this new technological relationship between the Department and the public, it is imperative that DHS engage the public in a manner that complies with federal accessibility, privacy, information technology security, and records laws. To ensure that the Department's use of unidirectional social media applications complies with federal laws, executive orders, regulations, and policies, and to apply standards consistently across the entire Department, the Office of the General Counsel (OGC), Office for Civil Rights and Civil Liberties (CRCL), Privacy Office (PRIV), Office of Public Affairs (OPA), Chief Information Security Office (CISO), and Office of Records Management (Records) will collaborate to ensure that all documents related to social

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<sup>17</sup> OMB Memorandum M-10-23, *Guidance for Agency Use of Third-Party Websites and Applications* (June 25, 2010), available at [http://www.whitehouse.gov/omb/assets/memoranda\\_2010/m10-23.pdf](http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-23.pdf).

<sup>18</sup> OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act* (April 7, 2010), available at [http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA\\_Gen\\_ICRs\\_5-28-2010.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA_Gen_ICRs_5-28-2010.pdf).





media are cleared and to ensure that compliance issues are considered and coordinated before implementation.

## **1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

When using the unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, no SORN is required.

## **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

Unidirectional social media applications used by the Department for providing content may be external and operated by third-party entities. DHS may also develop its own widgets. However, the government may place content on these third party websites or applications. Therefore, no internal system security plan is currently required. Users of widgets used by DHS must consult the security policies of unidirectional social media applications they use for more information as applicable.

## **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

The Department's Office of Records Management, Office of General Counsel, and other components are working together internally and with NARA to determine if the use of unidirectional social media applications creates records and if so the applicable records schedule(s). If it is determined that use of unidirectional social media applications creates government records, such records will be retained indefinitely until a records schedule is approved. Once a determination is made and an appropriate schedule identified and/or approved, the Department will follow that approved records schedule.

## **1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

Whether or not the Department's use of unidirectional social media applications triggers the PRA is context dependent.<sup>19</sup> When using those unidirectional social media

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<sup>19</sup> OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act* (April 7, 2010), available at [http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA\\_Gen\\_ICRs\\_5-28-2010.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA_Gen_ICRs_5-28-2010.pdf).



applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, most uses of unidirectional social media applications will be exempt from the PRA. As part of the PIA review process, programs must determine whether or not the PRA will apply. Those programs that are subject to PRA may be required to conduct a separate PIA.

## Section 2.0 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.

### **2.1 Identify the information the project collects, uses, disseminates, or maintains.**

Consistent with DHS policy the Department may utilize unidirectional social media applications for external relations (communications and outreach) and to disseminate timely content to the public about DHS initiatives, public safety, and other official activities. DHS may use these unidirectional applications to inform the public on a range of topics including: 1) airport security processing; 2) access to and security at federal buildings; 3) man-made and natural disaster preparedness; 4) transportation security; 5) pandemic outbreaks; 6) border access and security; and 7) other public safety purposes.

DHS programs using unidirectional social media applications are not permitted to actively seek PII. Unidirectional social media applications may request PII at the time of registration based on individual requirements distinct from those of the Department. This collection will vary. The Department does not automatically have access to, and will not seek, the public's registration information, including PII, unless the information used during registration pre-populates a public profile, if one exists. Through use of non-interactive social media applications, DHS and public users may have an account and, by nature of the program, PII may transit and be displayed by the system during the sign-up/long-on transaction and subsequent interactions.

### **2.2 What are the sources of the information and how is the information collected for the project?**

Unidirectional social media applications may request PII at the time of registration based on individual requirements distinct from those of the Department. This collection will vary. Unless the information, including PII, used during registration pre-populates a public profile, if one exists, the Department does not automatically have access to, and will not seek, the public's registration information. Through use of non-interactive social media applications, DHS and public users may have an account and, by nature of the program, PII may transit and be displayed by the system during the sign-up/long-on transaction and subsequent interactions.





## **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

DHS officials may disseminate content, one-way, to individuals and entities outside of the Department. Profiles, including PII, are used by these unidirectional social media applications and may be searchable by an individual's information. This functionality allows users to share content with others on a web-based platform provided by the host. Unidirectional social media applications may, among other uses, also employ user-defined data to advertise products.

## **2.4 Discuss how accuracy of the data is ensured.**

DHS is not actively collecting PII. It is disseminating public content related to its mission. When DHS uses unidirectional social media applications to disseminate content outside of the Department, it will work to ensure accuracy of content it disseminates.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

Risk: Given the nature of unidirectional social media applications, PII may transit and be displayed by the system during the sign-up/long-on transaction as well as being published on a public profile, if one exists.

Mitigation: To mitigate this risk, DHS has trained its staff not to actively collect PII or to enter it into the Department's systems.

## **Section 3.0 Uses of the Information**

The following questions require a clear description of the project's use of information.

### **3.1 Describe how and why the project uses the information.**

The Department may utilize certain unidirectional social media applications for external relations (communications and outreach) and to disseminate timely content to the public about DHS initiatives, public safety, and other official activities. When using those unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. The Department will only have access to PII when it is viewable through a public profile, if one exists.



### **3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.**

The Department will not dictate what technology the unidirectional social media applications use to analyze their products. The Department will not produce data except, potentially, in instances where the Department seeks to better understand the breadth and reach of mission-related content it is sharing through unidirectional social media applications, however, the analysis will only attempt to understand the breadth and reach through aggregated data. The Department will not identify an individual user.

### **3.3 Are there other components with assigned roles and responsibilities within the system?**

Unless otherwise directed by statute, executive order, or regulation the Department's public affairs officials will serve as the primary account holders for all unidirectional social media applications hosted on third party sites across the Department and will manage and approve all DHS content disseminated through these public-facing applications. The Department's public affairs officials will ensure that all disseminated content falls within the appropriate requirements for publicly available content. OPA will, when necessary, act as the final authority on what content is acceptable for posting.

### **3.4 Privacy Impact Analysis: Related to the Uses of Information**

Risk: Given the nature of unidirectional social media applications, PII may transit and be displayed by the system during the sign-up/long-on transaction as well as being published on a public profile, if one exists. The dissemination of content and the viewing of a user's public profile, if one exists, may expose Department users to PII and that information may be inappropriately incorporated into Departmental files.

Mitigation: To mitigate this risk, the Department recommends public users limit the PII submitted to unidirectional social media applications and made available on their profile, if one exists, viewable to the outside. DHS is not permitted to actively seek PII.

## **Section 4.0 Notice**

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.



### **4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

The Department shall set-up official accounts on third party applications and service providers which clearly establish that the accounts are managed by DHS. DHS may also develop its own widgets. For example, the Department shall use the DHS seal on the unidirectional social media applications when technologically possible. In addition, employees responsible for managing such applications should clearly identify themselves, such as “DHS John Q. Employee,” when disseminating to the public. The Department’s public affairs officials are content approvers for the Department.

In advance of utilizing unidirectional social media applications, the Department will examine the privacy policy, if one is available, of the application to evaluate the risks to determine whether it is appropriate for the Department’s use. Additionally, to the extent feasible, the Department will post a privacy notice on the application itself. When posting a link that leads to an application, the agency will provide an alert to the visitor, such as a statement adjacent to the link or a “pop-up.” The statement or “pop up” will explain that visitors are being directed to a nongovernment website, which may have different privacy policies from those of the Department’s official application. Users should also consult the privacy policies of unidirectional social media applications they subscribe to for more information as they apply. The Department’s privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).

### **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

In advance of utilizing unidirectional social media applications, the Department will examine the privacy policy, if one is available, of the application to evaluate the risks to determine whether it is appropriate for the Department’s use. Additionally, to the extent feasible, the Department will post a privacy notice on the application itself. When posting a link that leads to an application, the agency will provide an alert to the visitor, such as a statement adjacent to the link or a “pop-up.” The statement or “pop up” will explain that visitors are being directed to a nongovernment website, which may have different privacy policies from those of the Department’s official application. Users should also consult the privacy policies of unidirectional social media applications they subscribe to for more information as they apply. The Department’s privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).

As the PII collected by the unidirectional social media application is submitted for registration voluntarily by individuals to populate a public profile, if one exists, the Department cannot provide an opportunity to decline to provide information. With regard to the rights users may have on the unidirectional social media application,



individuals should consult the privacy policies of the applications they subscribe to for more information.

#### **4.3 Privacy Impact Analysis: Related to Notice**

Risk: There is a risk that public users will not know who they are receiving content from when sent by the Department and whether the account is official or fictitious.

Mitigation: The Department shall set-up official accounts that clearly establish that the accounts are managed by DHS. For example, the Department shall use the DHS seal on the unidirectional social media applications when technologically possible. In addition, employees responsible for managing such applications should clearly identify themselves, such as “DHS John Q. Employee,” when communicating with the public. The Department’s public affairs officials are content approvers for the Department. In addition, the Department will work with third party providers to remove any non-DHS accounts that imply that they are official.

Risk: There is a risk that public users will not understand that the unidirectional social media tools may be third party owned and that the privacy policies belong to the third party.

Mitigation: In advance of utilizing a unidirectional social media application, the Department will examine the privacy policy, if one is available, to evaluate the risks to determine whether it is appropriate for the Department’s use. Additionally, to the extent feasible, the Department will post a privacy notice on the unidirectional social media application itself. Users should also consult the privacy policies of unidirectional social media applications they subscribe to for more information as they apply. The Department’s privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).

## **Section 5.0 Data Retention by the project**

The following questions are intended to outline how long the project retains the information after the initial collection.

### **5.1 Explain how long and for what reason the information is retained.**

When using those unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists.

The Department’s Office of Records Management, Office of General Counsel, and other components are working internally, as well as with the NARA, to determine the



records schedule. Until the records schedule is approved, records are maintained indefinitely. Once approved, the Department will follow that approved records schedule.

Records may also be maintained by the unidirectional social media applications. Check specific unidirectional social media applications for details on records retention.

## **5.2 Privacy Impact Analysis: Related to Retention**

Risk: Retaining content for longer than is relevant and necessary can introduce privacy risks such as unauthorized use and disclosure.

Mitigation: To mitigate this risk, the Department will only maintain the mission-related content it sends via unidirectional social media applications. The Department's Office of Records Management, Office of General Counsel, and other components are working internally, as well as with the National Archives and Records Administration, to determine the records schedule. Once approved, the Department will follow that approved records schedule.

## **Section 6.0 Information Sharing**

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

### **6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.**

The mission-related content sent via unidirectional social media applications will be available to any and all users on a unidirectional social media application who are able to access the public-facing side of an account. The Department will only disseminate content after it has been appropriately approved and vetted by the Department's public affairs officials. In addition, all content will be posted on a Department website.

### **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

The mission-related content sent via unidirectional social media applications will be available to any and all users on a unidirectional social media application who are able to access the public-facing side of an account. The Department will only disseminate content after it has been appropriately approved and vetted by the Department's public affairs officials.

When using those unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of



unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, no SORN is required.

### **6.3 Does the project place limitations on re-dissemination?**

When using those unidirectional social media applications listed in Appendix A, DHS is not permitted to actively seek PII. Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, no re-dissemination will occur.

### **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

Content sent via the Department's unidirectional social media application is publicly available therefore it will be accessible to anyone with an internet connection. Content may also be shared by other electronic means and in paper form. In doing so, the Department's existing policies and procedures for information sharing govern.<sup>20</sup> The Department's public affairs officials are content approvers for the Department. This includes sharing of mission-related content outside of the Department.

Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, no PII will be disclosed outside the Department.

### **6.5 Privacy Impact Analysis: Related to Information Sharing**

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<sup>20</sup> Available at [http://www.dhs.gov/xlibrary/assets/dhs\\_information\\_sharing\\_strategy.pdf](http://www.dhs.gov/xlibrary/assets/dhs_information_sharing_strategy.pdf).





Risk: Sharing too much mission-related content is a risk inherent in this process. This has the potential of exposing the Department to more public user profiles.

Mitigation: Department employees share only as much content as necessary in the performance of official Department duties with those who have a need-to-know. The Department's employees and contractors will be trained on the appropriate use and sharing of unidirectional social media application content.

Because of the one-way nature of unidirectional social media applications, the Department will also not receive PII unless viewable through a public profile, if one exists. Therefore, no PII will be disclosed outside the Department.

## Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

### **7.1 What are the procedures that allow individuals to access their information?**

As a general matter, the Department is not collecting PII on individuals and so there is no PII that an individual could redress. Nevertheless, the Department's public affairs officials will post their contact information on the unidirectional social media applications to allow any individual to contact the Department. Individuals should also consult the privacy policies of the unidirectional social media applications they subscribe to for more information related to those unidirectional social media applications access provisions.

### **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

As noted above, the Department is not collecting PII about individuals therefore generally will not have a record that needs to be corrected. In most instances the individual is able to correct the public profile, if one exists, on the unidirectional social media application directly. The Department's public affairs officials will post their contact information on the application to allow any individual to contact the Department. Individuals should also consult the privacy policies of the applications they subscribe to for more information related to those unidirectional social media applications access provisions. The Department's privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).



### **7.3 How does the project notify individuals about the procedures for correcting their information?**

As noted above, the Department's dissemination of content via unidirectional social media applications does not include collecting information about individuals therefore generally will not have a record held by the Department that needs to be corrected. If the individual subscribes to a widget where the owner of the widget requires the individual to register before accessing the application, in most instances the individual is able to correct PII on the unidirectional social media application directly.

The Department's public affairs officials will post their contact information on the application to allow any individual to contact the Department. Individuals should also consult the privacy policies of the applications they subscribe to for more information related to those unidirectional social media applications access provisions. The Department's privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).

### **7.4 Privacy Impact Analysis: Related to Redress**

For activities under this PIA, the Department will not be collecting PII. In most instances the unidirectional social media application is designed so that the individual has direct control over his/her PII and can make any corrections required. Nevertheless, the Department's public affairs officials will post their contact information on the applications to allow any individual to contact the Department. This contact information, in most cases, will be in the form of standard email and physical mailing addresses.

The public user profile PII available on unidirectional social media applications, if one exists, is largely user-generated, meaning the individual chooses the amount of information available about himself or herself as well as the ease with which it can be accessed by other users. Thus, the primary account holder should be able to redress any concerns through the unidirectional social media application. Individuals should also consult the privacy policies of the unidirectional social media applications they subscribe to for more information related to those non-interactive social media applications access provisions. The Department's privacy policy can be viewed at [http://www.dhs.gov/xutil/gc\\_1157139158971.shtm](http://www.dhs.gov/xutil/gc_1157139158971.shtm).

## **Section 8.0 Auditing and Accountability**

The following questions are intended to describe technical and policy based safeguards and security measures.

### **8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?**



The unidirectional social media applications listed in Appendix A are subject to Privacy Compliance Reviews by the DHS Privacy Office.

## **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

The Department's federal employees and contractors are provided annual privacy training. Officials approving, disseminating, and sharing mission-related content are provided additional training by the Department's public affairs officials.

## **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

Where the Department uses unidirectional social media applications for content distribution it will establish official accounts which will be controlled by the Department's public affairs officials who will ensure that only authorized individuals have access. DHS must set-up an official account which clearly establishes that the account is managed by DHS. For example, components should use the DHS seal on the unidirectional social media application when technologically possible. In addition, employees responsible for managing such applications should clearly identify themselves, such as "DHS John Q. Employee," when interacting with the public.

As part of their official contractual duties, when supervised by a federal employee, contractors may provide support for to the Department's unidirectional social media applications.

## **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

As a result of this new technological relationship between the Department and the public, it is imperative that DHS engage the public in a manner that complies with federal accessibility, privacy, information technology security, and records laws. To ensure that the Department's use of social media complies with federal laws, executive orders, regulations, and policies, and to apply standards consistently across the entire Department, the offices of OGC, CRCL, PRIV, OPA, CISO, and Records will collaborate to ensure that all documents related to unidirectional social media applications are cleared to ensure compliance issues are considered and coordinated before implementation.

Appendix A of this PIA will serve as a listing, to be updated periodically, of DHS unidirectional social media applications, approved by the Chief Privacy Officer, that follow the requirements and analytical understanding outlined in this PIA.



## **Responsible Officials**

Kathleen McShea  
Director of New Media and Web Communications  
Office of Public Affairs  
Department of Homeland Security

## **Approval Signature**

**Final signed version on file with the DHS Privacy Office.**

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Mary Ellen Callahan  
Chief Privacy Officer  
Department of Homeland Security



## **Appendix A**

Non-interactive social media applications covered by this PIA include:

DHS Office of Public Affairs

Google Calendar – April 1, 2011

RestoretheGulf.gov – April 1, 2011

FEMA

Online News Room – March 14, 2011

Widgets – March 14, 2011

Smartphone App – August 8, 2011