Privacy Impact Assessment
For
Secretary of Education Arne Duncan Facebook Page

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System Owner:
Office of Communications and Outreach

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U.S. Department of Education (ED)

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

The Secretary of Education Arne Duncan Facebook Page ("the Facebook Page") is a page on Facebook that will provide an additional channel for ED to reach out to high school and college students, new teachers, and parents. Facebook is a social networking website that is operated and privately owned by Facebook, Inc. Users can add friends, send them messages, and update their personal profiles to notify friends about themselves. While Facebook is an external website, the Facebook Page will be controlled by the Department of Education. It will provide information to visitors and will permit comments, but will not respond to any comments. The Secretary will not comment on other people's status, write on their walls, or respond to comments on his status.

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 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. 20 U.S.C. Section 3412(e)(2).

Additionally, any user visiting the Facebook Page is doing so entirely voluntarily and therefore, any information displayed is provided voluntarily by users.

3. **Characterization of the Information. What elements of Personal Identifiable Information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number, etc.)?** 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?

Content that ED places on the Facebook Page will not contain any personally identifiable information (PII). There is a space for users to provide comments on a "Wall" or users can send a message. The information displayed on the Facebook Page that was provided by a user, may or may not contain PII data. 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 choose to list their real names and load clear photos of themselves. Other individuals 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 the networks before they join. Information is voluntarily contributed by persons to a network after they register as a member, 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.

No characterization can be provided in this PIA about the kinds of PII that might be posted by members over the course of their interactions with a social network. The extent of PII revealed by the member is completely at his or her discretion.

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 type of data collected, discuss the privacy risks identified and how they were mitigated.

The information displayed on the Facebook Page that was provided by visitors is not actively being collected by ED. If a user provides a comment or posts information, they do so voluntarily. The Facebook Page has been developed to provide an additional delivery method for ED information, and no information will be collected or maintained in any ED system.

The privacy risk from loss or exposure of the information on the Facebook Fan 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.

Generally speaking, harm to the reputation of an agency can be a vulnerability that concerns federal agencies 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) outweigh any reputational risk. ED will monitor content posted by members and appropriately exercise its prerogative to remove PII or inappropriate content.

5. **Social Security Numbers - 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.

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.

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.

The Facebook Page was created to provide a new channel for the department to broadcast its core messages targeted at high school and college students, new teachers, and parents of young children. The page will feature:

- Regular (perhaps daily) updates on Arne's status (e.g. where he's speaking, who he's meeting with, etc.).
- Video produced by ED, media organizations, and television shows.
- Links to newspaper stories, magazine articles, and blog posts that feature Arne.
- Photos taken by ED and newspaper photographers.
- Text of speeches.

No information will be purposefully collected. 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, nor will ED use the information to contact any of the users.

7. **Internal Sharing and Disclosure. Which internal DoED organizations will the information being shared?** What information is shared? For what purpose is the information shared? Describe the risks to privacy for internal sharing and disclosure and describe how the risks were mitigated.

Any Departmental 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.

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 (MOU) or other type of approved sharing agreement with another agency? Describe the risks to privacy from external sharing and disclosure and describe how the risks are mitigated.

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 the Department of Education and the public.

9. **Notice. Is a 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?

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.

10. **Web Addresses**

http://www.facebook.com/SecretaryArneDuncan

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.

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

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:

These records are currently unscheduled. Applicable records retention schedules will be identified and/or developed, and submitted to the NARA if required. Until the records retention determinations are finalized, no records will be destroyed.

Certifying Officials Signatures:

Senior Program Official	11/16/09 **Date**
Computer Security Officer	19 Nov 09 **Date**

For systems that collect, maintain, or transfer SSNs:

Assistant Secretary or equivalent	**Date**
Privacy Advocate	12/2/09 **Date**