

Department of the Interior
Privacy Impact Assessment

March 1, 2011

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

Once the PIA is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- Bureau/office IT Security Manager
- Bureau/office Privacy Act Officer
- DOI OCIO IT Portfolio Division
- DOI Privacy Act Officer

Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division.

Also refer to the signature approval page at the end of this document.

A. CONTACT INFORMATION:

Who is the person completing this document? (Name, title, organization, and contact information)

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Who is the system owner? (Name, title, organization, and contact information)

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Who is the Reviewing Official? (According to OMB, this is the agency CIO or other agency head designee, who is other than the official procuring the system or the official who conducts the PIA)

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

- 1) **Does this system contain any information about individuals** *{this question is applicable to the system and any minor applications covered under this system}?*

YouTube is an online video sharing application operated by a third party which allows users to upload and share videos. Information identifiable to the individual may be present within the YouTube application; however, DOI does not collect or maintain PII from use of the YouTube application.

- a. **Is this information identifiable to the individual¹ {this question is applicable to the system and any minor applications covered under this system}?** (If there is NO information collected, maintained, or used that is identifiable to the individual in the system, Sections D through G can be marked not applicable. If YES complete all sections for system and any applicable minor applications).

Yes, videos or comments posted on YouTube may contain information identifiable to individuals.

- b. **Is the information about individual members of the public {this question is applicable to the system and any minor applications covered under this system}?** (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Yes, videos or comments posted on YouTube may contain information identifiable to individual members of the public.

- c. **Is the information about employees {this question is applicable to the system and any minor applications covered under this system}?** (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes, videos or comments posted on YouTube may contain information that is identifiable to individual employees.

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

YouTube is an online Video-Sharing Service which serves as a distribution point for videos which can be viewed world-wide. YouTube allows users to upload, share, and view videos. Registered users can upload an unlimited number of videos, including TV clips, movie clips, music videos, video blogging and short original videos. Unregistered users may view videos. Such services may also accept text and video “replies” to video messages, or allow “embedding” of videos on other sites, such as .gov sites. DOI uses YouTube to distribute public messages and coverage of public events to the public, enhance communication, and increase government transparency. The primary account holder is the Department of the Interior Office of Communications, who will be responsible for ensuring information posted on the Department’s official YouTube page is appropriate and approved for public dissemination. Use of YouTube allows DOI and bureaus to reach a much wider audience and greatly increases the visibility of DOI video content.

3) What legal authority authorizes the purchase or development of this system/application?

Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, Dec. 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 USC 1401; OMB Circular A-130; 110 Departmental Manual 18, DOI Handbook 110 DM 5.3.A.

¹ “Identifiable Form” - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

C. DATA IN THE SYSTEM:

1) What categories of individuals are covered in the system?

Individuals who visit YouTube to upload or view “embedded” videos and post comments, including members of the general public and Federal employees. DOI does not collect, maintain, or disseminate PII from use of YouTube.

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

YouTube videos are posted by registered users, who may include general members of the public, private organizations, and agencies. IP addresses come directly from the browser interaction of the individuals who click on the video URLs; however, DOI has no ability to gather IP addresses from a user’s YouTube interaction.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

IP addresses come directly from the browser interaction of the individuals who click on the video-sharing URLs. DOI gathers no IP addresses.

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

Federal agencies may utilize YouTube as part of their public outreach and information dissemination efforts; however, DOI does not receive PII or other information from Federal agencies through the use of YouTube.

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

Tribal, State and local agencies may utilize YouTube as part of their public outreach and information dissemination efforts; however, DOI does not receive PII or other information from these agencies through the use of YouTube.

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

None.

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

DOI does not actively collect, maintain or disseminate PII from use of Youtube; however, comments posted by users in response to DOI video content may include usernames. There may also be cases where PII becomes available to DOI, for example, where there is evidence of criminal activity, a threat to the government or the public, or when an employee violates DOI policy and is referred for disciplinary action. This information may include username and content, and will be turned over to the appropriate law enforcement organizations.

DOI’s Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also informs the public that they may be subject to third party privacy policies when they leave a DOI official website to link to third party web sites.

3) Accuracy, Timeliness, and Reliability

a. **How will data collected from sources other than DOI records be verified for accuracy?**

DOI does not gather data on individuals and does not verify data for accuracy.

b. **How will data be checked for completeness?**

DOI does not gather data on individuals and does not check data for completeness.

c. **Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).**

DOI does not gather data on individuals and does not check data for currency.

d. **Are the data elements described in detail and documented? If yes, what is the name of the document?**

N/A - DOI will gather no data on individuals.

D. ATTRIBUTES OF THE DATA:

1) **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

DOI does not collect or maintain data on individuals. DOI uses YouTube to post videos to a wide range of public viewers in order to disseminate information, provide coverage of public events, and increase the visibility of DOI video content.

2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No.

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

N/A - DOI does not collect or maintain data on individuals.

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

N/A - DOI does not collect or maintain data on individuals.

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

N/A - DOI does not collect or maintain data on individuals.

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

N/A - DOI does not collect or consolidate data via YouTube.

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

N/A – DOI is not consolidating processes.

- 8) **How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Data will not be retrieved as DOI does not collect, maintain or disseminate data from use of YouTube. However, there may be cases where there is evidence of criminal activity, a threat to the government or the public, or an employee violates DOI policy and is referred for disciplinary action. This information may include username and content of videos or comments, and appropriate law enforcement organizations will be notified.

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

Reports on individuals will not be generated by DOI.

- 10) **What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

DOI does not request information from individuals. YouTube users can decline to provide information prior to registration and use of YouTube, can control access to the personal information they choose to make public through user-level administrative controls and account settings, or by not posting videos or comments. However, the provision and use of information provided applies only to YouTube, DOI has no control over YouTube privacy policy, use or collection of information, and does not request or collect PII from individuals' use of YouTube.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

DOI does not own, maintain, host or manage the YouTube system. YouTube is a third party social media application.

- 2) **What are the retention periods of data in this system?**

DOI does not collect, maintain or disseminate PII from use of YouTube. Any information provided on YouTube is subject to third party privacy, security and records policies. However, as part of its public outreach effort, DOI disseminates information through video content on YouTube regarding mission-related activities, which may be subject to Federal records requirements. DOI has submitted a social media records schedule to the National Archives and Records Administration for approval. The social media records schedule is for the management of general electronic records of official information postings published by DOI, and includes various activities that integrate web technology, social interaction and user-generated content. The records disposition is temporary, and records are destroyed when no longer needed for agency business. However, pending NARA approval all records are treated as permanent.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

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

- 4) Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

DOI is utilizing YouTube, an innovative third party social media application, to enhance communication with the public, post videos to a wide range of public viewers in order to disseminate information, provide coverage of public events, and increase the visibility of DOI video content.

- 5) How does the use of this technology affect public/employee privacy?**

Affect on public/employee privacy is minimal as DOI does not collect, maintain, or disseminate any PII from YouTube. However, DOI does disseminate information on its mission-related activities which has been reviewed and approved for public dissemination so any privacy risks for unauthorized disclosure of personal data by the Department is mitigated. DOI's Privacy Policy informs the public that they are subject to third party social media website privacy and security policies, and DOI also informs the public that they may be subject to third party privacy policies when they leave a DOI official website to link to a third party social media web site.

- 6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

DOI does not collect, maintain, or disseminate PII from YouTube, and does not monitor, identify or track individual users.

- 7) What kinds of information are collected as a function of the monitoring of individuals?**

N/A - DOI does not monitor or collect information on individuals via YouTube.

- 8) What controls will be used to prevent unauthorized monitoring?**

DOI does not monitor individuals via YouTube, and does not control access or content posted by YouTube users, except such content that violates our or YouTube's Terms of Use/Participation. DOI does not edit content. In the case of a TOU violation, content may be removed, not edited.

- 9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

DOI has developed DOI-08, Social Networks System of Records Notice, which is expected to be published in May 2011, for referrals for criminal activity, threats to the government or the public, and to enable DOI Bureaus or Offices to implement public outreach programs associated with third party social media applications that may contain usernames and/or contact information and result in the creation of a Privacy Act system of records. DOI does not actively collect, maintain or disseminate PII obtained from the use of YouTube.

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

N/A

F. ACCESS TO DATA:

- 1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)**

All YouTube visitors have access to DOI's official YouTube pages and the videos and comments posted there, including members of the public, Federal employees, private organizations and other agencies.

- 2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

DOI will have no additional access to information on individuals using YouTube beyond what is commonly accorded to site-users. In addition, DOI will not gather any data on individuals.

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

Neither DOI, nor viewers of shared videos, will have additional access to information on individuals. All YouTube visitors will be able to view videos and comments posted.

- 4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

DOI and YouTube visitors will have no access to additional individual information beyond the content of videos or comments posted.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

YouTube is a private third party software as a service social media application. DOI does not have a part in the development or maintenance of YouTube, nor is DOI providing remuneration of any kind.

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

No.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

N/A – DOI systems do not interface with the YouTube application. DOI posts videos to YouTube in order to enhance communication with the public, disseminate information, provide coverage of public events, and increase the visibility of DOI video content. DOI videos on its mission-related activities are reviewed and approved prior to public dissemination.

- 8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?**

YouTube is an online Video-Sharing Service which serves as a distribution point for videos which can be viewed world-wide. Videos and comments may be posted and accessed by all users, including other Federal, Tribal, State, and Local agencies. DOI does not collect or share data from YouTube with other agencies.

9) How will the data be used by the other agency?

N/A – DOI does not collect or share data from YouTube.

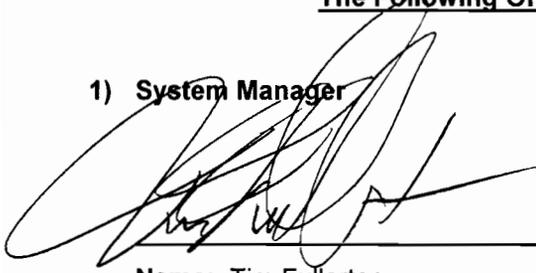
10) Who is responsible for assuring proper use of the data?

The primary YouTube account holder is the Department of the Interior Office of Communications, which is responsible for ensuring videos and information posted on the Department's official YouTube page is appropriate and approved for public dissemination. Other YouTube pages are run by appropriate DOI bureaus and offices.

See Attached Approval Page

The Following Officials Have Approved this Document

1) System Manager



(Signature)

5/10/11 (Date)

Name: Tim Fullerton

Title: Director of New Media

2) Chief Information Security Officer



(Signature)

5/10/11 (Date)

Name: Lawrence K. Ruffin

Title: Chief Information Security Officer (CISO)

3) Privacy Act Officer



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5/11/11 (Date)

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4) Reviewing Official



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