



Privacy Compliance Review
of the
2010 Winter Olympics Social Media Event Monitoring Initiative
and
Haiti Social Media Disaster Monitoring Initiative

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I. SUMMARY

The Department of Homeland Security (DHS) Office of Operations Coordination and Planning (OPS), including the National Operations Center (NOC), launched the Social Networking/Media Capability (SNMC) to assist DHS and its components involved in the response, recovery, and rebuilding effort resulting from the earthquake and after-effects in Haiti as well as the security, safety, and border control associated with the 2010 Winter Olympics in Vancouver, British Columbia (BC). In compliance with its statutory obligation,¹ OPS, through SNMC Analysts in the NOC, monitored publicly available online forums, blogs, public websites, and message boards to collect information used in providing situational awareness and establishing a common operating picture. The DHS Privacy Office (PRIV) conducted a Privacy Compliance Review (PCR) of SNMC Analyst activities, as outlined in both the Haiti Social Media Disaster Monitoring Initiative PIA (January 21, 2010)² and 2010 Winter Olympics Social Media Event Monitoring Initiative PIA (February 10, 2010).³

At the time of the PCR, PRIV found that SNMC activities substantially complied with the stated privacy parameters set forth in the underlying PIAs. However, OPS/NOC had not yet finalized a records retention schedule for SNMC Analyst-generated data including, but not limited to, New Media Monitoring Capability Reports. Since there may be personally identifiable information (PII) in SNMC Analyst-generated data and reports, clearly defining how long that data will be retained is key to minimizing privacy impact. Subsequent to the PCR, OPS/NOC has finalized a records retention schedule. PRIV will re-evaluate the records retention schedule as well as conduct a more in-depth review of websites and the applicable social media Internet-based platforms and information technology infrastructure that have been monitored during the scheduled November 2010 follow-up PCR.

II. SCOPE AND METHODOLOGY

Following the Chief Privacy Officer's approval of the Haiti Social Media Disaster Monitoring Initiative PIA and 2010 Winter Olympics Social Media Event Monitoring Initiative PIA, PRIV conducted the PCR on SNMC Analyst activities, as outlined in both PIAs. The PRIV PCR team including, Becky Richards (Director of Privacy Compliance), Eric Leckey (Associate Director for Privacy Compliance), and Christal Hoo (Privacy Compliance Specialist), interviewed OPS/NOC leadership and SNMC Analysts including, Donald Triner (Acting Director, NOC), Mark Evetts (Deputy Director, NOC), Ray Cole (Senior OPS/NOC Advisor), John Kluge (OPS/NOC Attorney/Advisor), Michael Page (OPS/NOC Privacy Point of Contact), and SNMC Analysts (not identified by name) to better understand information collected, used, retained, and shared.

¹ Section 515 of the Homeland Security Act (6 U.S.C. § 321d(b)(1)).

² http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_ops_haiti.pdf

³ http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_ops_2010winterolympics.pdf



The following methodology was developed by the PRIV PCR team to serve as the outline for the PCR:

- i. PRIV sent OPS/NOC leadership a questionnaire in advance of the PCR meeting with specific questions regarding SNMC activities under the PIAs and the steps taken to ensure adequate privacy protections were in place;
- ii. PRIV conducted a OPS/NOC SNMC capability and watch desk site visit;⁴
- iii. PRIV observed SNMC Analysts monitoring publicly available online forums, blogs, public websites, and message boards displaying the results in detail on a plasma screen;
- iv. PRIV witnessed SNMC Analysts documenting their findings in the form of New Media Monitoring Capability Reports;
- v. PRIV interviewed SNMC Analysts and OPS/NOC leadership who use, have access to, and are responsible for accurate reporting of this data as well as managing how it is collected, used, retained, and shared;
- vi. PRIV reviewed copies of all SNMC Analyst-generated data including, but not limited to, New Media Monitoring Capability Reports as well as the SNMC Analyst Handbook which PRIV further reviewed and analyzed off-site;
- vii. PRIV discussed the questionnaire replies in detail with OPS/NOC leadership and SNMC Analysts as well as posed further questions to them to address the remainder of the privacy concerns.

III. FINDINGS

The following are requirements generally outlined in the Haiti Social Media Disaster Monitoring Initiative PIA and 2010 Winter Olympics Social Media Event Monitoring Initiative PIA. The requirements are followed by the review conducted by PRIV as well as findings concluded upon after the PCR.

Collection of Information

Requirement: All PII incidentally collected must be redacted.

Review: SNMC Analysts visually scan various Really Simple Syndication (RSS) feeds that may be published on publicly available online forums, blogs, public websites, and message boards for matching items. Using predefined search terms to discover items of interest, SNMC Analysts collect and store these “hits” in order to conduct trend analysis. If PII is captured in the process, it is redacted prior to further dissemination unless exceptional circumstances exist (i.e., life or death implications). PRIV reviewed every New Media Monitoring Capability Report generated for a two-week period and found that all PII had been redacted.

Finding: PRIV finds that OPS/NOC meets privacy standards for collection of SNMC information.

⁴ The SNMC analyst watch is composed of two watch analysts; one assigned to monitor social networking and the other media activity.



Use of Information

Requirement: SNMC Analysts will only monitor publicly available online forums, blogs, public websites, and message boards to collect information used in providing situational awareness and establishing a common operating picture. In accordance with the requirements of the 2010 Winter Olympics Social Media Event Monitoring Initiative PIA and Haiti Social Media Disaster Monitoring Initiative PIA, no individualized user accounts will be created.

Review: PRIV reviewed New Media Monitoring Capability Reports generated for a two-week period and found that the publicly available online forums, blogs, public websites, and message boards listed were all publicly available. During the interview process, the OPS/NOC leadership and SNMC Analysts understood that under the 2010 Winter Olympics Social Media Event Monitoring Initiative PIA and Haiti Social Media Disaster Monitoring Initiative PIA, they did not have the authority to set up user accounts. SNMC Analysts noted that through news and other media, as well as monitoring of publicly available online forums, blogs, public websites, and message boards they are able to identify “hot spots” of activity and use those hot spots to research and target issues of concern to OPS/NOC, and the Department. Targeting focuses on issues, geography, events, and other special de-identified characteristics.

Finding: PRIV finds that OPS/NOC use of SNMC Analyst-generated data including, but not limited to, New Media Monitoring Capability Reports, is consistent with the stated purpose for original collection. PRIV plans to conduct a more in-depth review of websites and the applicable social media Internet-based platforms and information technology infrastructure to ensure use of the information continues to be limited to authorized personnel on a need to know basis during the scheduled November 2010 PCR.

Retention of Information

Requirement: SNMC Analysts will retain only user-generated information posted to publicly available online forums, blogs, public websites, and message boards. OPS/NOC will not retain information related to individuals posting the information.

Review: PRIV reviewed the New Media Monitoring Capability Reports generated for a two-week period and found that OPS/NOC retained only user-generated information posted to publicly available online forums, blogs, public websites, and message boards and did not retain information related to individuals posting the information.

Finding: PRIV finds that only user-generated information posted to publicly available online forums, blogs, public websites, and message boards are retained.

Requirement: A records retention schedule for both initiatives must be established and approved by the OPS/NOC records officer, Department records officer, and National Archives and Records Administration (NARA).

Review: At the time of this review, a records retention schedule had not been established and approved by the OPS/NOC records officer, Department records officer, and NARA.



OPS is in the process of developing and obtaining approval for a records retention schedule.

Finding: OPS/NOC must finalize a records retention schedule and send to the Department records officer and NARA for approval. PRIV will conduct a further review in November 2010 to ensure this process is complete. (Note: As of the signing of this PCR, OPS/NOC has finalized the retention schedule; it has been approved by the Department records officer, and has been sent to NARA.)

Internal Sharing and Disclosure

Requirement: SNMC Analysts will share information with Department leadership and with those components within the Department involved in the response, recovery, and rebuilding effort in Haiti and in the security, safety, and border control associated with the 2010 Winter Olympics.

Review: SNMC New Media Monitoring Capability Reports are emailed only to Department employees and contractors who have requested and been approved, by the NOC Director, to receive reports and as such, are on the distribution list maintained and controlled by the NOC Director.

Finding: PRIV finds that the sharing of information and reports generated is sufficiently limited to those who have a need to know and that privacy risks are minimal in that data is gleaned only from publicly available online forums, blogs, public websites, and message boards which users have voluntarily posted information.

External Sharing and Disclosure

Requirement: SNMC Analysts will share information with those private sector and international partners where necessary, appropriate, and authorized by law, executive order, or regulation who are involved in the response, recovery, and rebuilding effort in Haiti and in the security, safety, and border control associated with the 2010 Winter Olympics.

Review: PRIV conducted interviews of OPS/NOC leadership and SNMC Analysts and specifically queried how and under what circumstances New Media Monitoring Capability Reports are shared with external entities.

Finding: PRIV finds that SNMC Analyst external sharing and disclosure of New Media Monitoring Capability Reports complies with the framework set forth in both PIAs and is limited to the sharing necessary to provide situational awareness and to establish a common operating picture.

Training and Accountability

Requirement: OPS/NOC must train SNMC Analysts on activity that is permitted under both PIAs.

Review: All SNMC Analysts are provided a SNMC Analyst Handbook detailing the training, daily activities, and expectations of all SNMC Analysts. SNMC Analysts are



trained in redaction of PII as outlined in both PIAs. As a further reminder, above each work station is a chart defining PII and the steps to be taken to redact PII from any data collected.

Finding: PRIV finds that OPS/NOC is adequately training SNMC Analysts on activity that is permitted under both PIAs.

Requirement: OPS/NOC must maintain an audit log of websites and the applicable social media Internet-based platforms and information technology infrastructure that SNMC Analysts visit under both PIAs.

Review: OPS/NOC has an audit log in place of websites and the applicable social media Internet-based platforms and information technology infrastructure that SNMC Analysts visit under both PIAs.

Finding: PRIV will conduct a more in-depth review of websites and the applicable social media Internet-based platforms and information technology infrastructure that have been monitored during the scheduled November 2010 PCR.

IV. CONCLUSION AND RECOMMENDATIONS

PRIV finds that OPS/NOC and SMNC Analyst activities are in compliance with the PIAs and initiatives considered under this PCR. OPS/NOC should continue to train SNMC Analysts and follow the SNMC Analyst Handbook provided to all analysts.

At the time of this PCR, OPS/NOC should have had a finalized records retention schedule to be sent to NARA. This was not completed, but subsequent to the PCR, OPS/NOC completed the records retention schedule, obtained Department records officer approval, and submitted it to NARA for approval. At the November 2010 PCR, PRIV will review the Department-approved and NARA-approved records retention schedule. Also, in November 2010, PRIV will conduct further review of websites and the applicable social media Internet-based platforms and information technology infrastructure audit logs.

V. PRIVACY COMPLIANCE REVIEW APPROVAL

Responsible Official

Donald Triner
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Office of Operations Coordination and Planning

Approval Signature

Original signed and on file with the DHS Privacy Office

Mary Ellen Callahan
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