



**Federal Trade Commission  
Privacy Impact Assessment**

**for the:**

**Admongo Evaluation**

**November 2015**

## **1 System Overview**

The FTC's Bureau of Economics is conducting an evaluation of Admongo, the FTC's advertising literacy ("ad literacy") program for children ages 8-12. A market research contractor will select 800 students for participation from among its existing panelists. Students must have parental permission to participate in the evaluation. A randomly selected group of students will play the online game component of Admongo and then take an online ad literacy test. Their scores will be compared to those of a control group who take the test without exposure to Admongo. The performance of the two groups will then be analyzed for evidence that the Admongo online game can improve ad literacy. Demographic, financial, and family information will also be collected through an online screening questionnaire administered to students' parents, so that the FTC can study the influence of these factors on ad literacy.

This PIA is specific to the FTC's evaluation of Admongo. There is also a separate [PIA](#) for the Admongo game ("Admongo PIA"). Although students in the treatment group will be playing the Admongo game on a new website set up specifically for this evaluation, not on the FTC's existing Admongo game website, their information generally will be collected, used, and maintained as described in the Admongo PIA, except as noted below. The other components of the Admongo evaluation—the ad literacy test and the parental questionnaire—will be hosted on the market research contractor's website.

Some of the information collected during the evaluation will be shared with contractors who are assisting with the evaluation—*i.e.*, the market research contractor that selects the participants, the web development firm that operates the Admongo game website, and the children's marketing consultants who are assisting in the design and implementation of the evaluation. The data provided to the web development firm, the children's marketing consultants, and to the FTC will be identified only by study IDs, without any other personal identifiers that could be used to identify individual participants. Only the market research contractor will have access to the information that relates a participant's study ID to his or her personally identifiable information (PII).

## **2 Information Collected and Stored within the System**

The following questions are intended to define the scope of the information in the system, specifically the nature of the information and the sources from which it is obtained.

**.1 What information is to be collected, used, disseminated, or maintained by the system?**

**Game performance data:** For all students in the treatment group, their time spent playing the Admongo game (and other measures of their performance within the game, such as which challenge questions they answer correctly, which game level they attain, and how long they spend on each level) will be logged.

**Online test answers:** For students in both the treatment and control groups, their answers to the online advertising literacy test will be collected. Twenty-six of the questions are objective questions that focus on topics such as identifying ads in their various forms and recognizing various persuasive techniques. The remaining eight questions ask about the students' individual experiences and opinions, such as how their experiences with products compare to the impressions given in advertisements and whether they receive guidance from their parents about advertising.

**Questionnaire information:** The online screening questionnaire administered to students' parents asks about demographic, financial, and family characteristics, including the following:

- student's age, sex, grade level, and race/ethnicity
- whether the student attends private or public school
- Census region of residence (West, Midwest, Northeast, or South)
- whether there is a computer in the home, whether this computer has Internet access, and whether the student is allowed to go to kids' websites on the Internet
- number, age, sex, and grade level of other children in household
- annual household income
- caregiver's sex, age, educational attainment, employment status, race/ethnicity, and marital status.

**.2 What are the sources of the information in the system?**

The information will be collected directly from the parents and students participating in the survey, or automatically generated and collected as a result of such participation (e.g., game performance data).

**.3 Why is the information being collected, used, disseminated, or maintained?**

The performance of the control group will allow the FTC to study the pre-existing ad literacy skills of 8-12 year old Americans, while the comparison of control and treatment groups will tell the FTC how one intervention designed to augment youth ad literacy has fared. The results will provide cost effectiveness data on an important component of the FTC's youth-targeted outreach. Cost effectiveness data will enable FTC staff to evaluate both this program and the potential use of other similar programs in the future.

**.4 How is the information collected?**

As noted above in Section 2.2, game performance data will be generated and collected automatically within the Admongo online game. Online test answers will be collected when the students take the online ad literacy test. Questionnaire information will be collected when parents fill out an online screening questionnaire. All information will be tabulated by computer and transmitted over the Internet.

**.5 How will the information be checked for accuracy and timeliness (currency)?**

The twenty-six objective questions on the online ad literacy test are designed with a single right answer in mind, and the study will examine the proportion of these questions that are answered correctly. Accuracy of test answers does not determine any individual rights or benefits, and is reviewed solely to help analyze whether Admongo improves ad literacy. For similar reasons, the subjective questions on the online ad literacy test and the responses to the parental questionnaire will not be checked for accuracy or timeliness.

**.6 Is the system using technologies in ways that the FTC has not previously employed (e.g., monitoring software, Smart Cards, etc.)? If so, how does the use of this technology affect individuals' privacy?**

No. The website where students in the treatment group will play the Admongo game will be a copy of the FTC's existing Admongo game

website. The market research contractor's website that hosts the ad literacy test and the parental questionnaire will use common web survey technologies.

**.7 What law or regulation permits the collection of this information?**

The FTC Act authorizes the FTC to prevent unfair and deceptive acts and practices in interstate commerce and, in furtherance of this mission, to gather, compile, and make information available in the public interest. See 15 U.S.C. §§ 45, 46(a), (f).

**.8 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?**

Participation in the evaluation is voluntary; participants are drawn from existing pools of Internet panelists (i.e., households that have already indicated they are willing and able to take part in Internet research). The market research contractor requires parents to opt in before information is collected from their children, and parents are free to refuse the invitation to participate in any particular study. Before information is collected from students for the Admongo evaluation, parents are again asked to confirm that they are willing to have their child participate in the evaluation. If parents or students begin the evaluation and decide not to complete it, their information will not be used in the evaluation.

In addition, the information collected from the students is limited in two ways. First, the game performance data for students in the treatment group is limited to the information necessary to determine the extent to which the students have engaged with the Admongo game. Second, the questions on the online ad literacy test are multiple-choice, true-false, or yes-no questions. None of this information contains PII that could be used to identify the children.

**3 Use and Access to Data in the System**

The following questions are intended to clearly describe how the information in the system will be used, and who will use it.

**.1 Describe how information in the system will or may be used.**

Game performance data for students in the treatment group will be used to ensure that they have played the game for an hour, and to assess their engagement with the game's content.

The online test answers will be used to estimate Admongo's effect on ad literacy.

The questionnaire information will be used to increase the precision of the estimate of Admongo's impact and to study the influence of demographic, financial, and family characteristics on ad literacy.

**.2 Which internal entities will have access to the information?**

FTC staff in the Bureau of Economics and the Division of Consumer and Business Education will receive the game performance data, the online test answers, and the questionnaire information. All information will be identified only by study ID, without any personal identifiers that could be used to re-identify individual participants.

The children's marketing consultants who will help run the study will also receive the same anonymized data as the FTC.

The web development firm that operates the Admongo game will have access to the game performance data for students in the treatment group. All information will be identified only by study ID, without any personal identifiers that could be used to re-identify individual participants.

The market research contractor will have access to the game performance data, the online test results, and the questionnaire information. In addition, the market research contractor will know which study IDs relate to which participants.

**.3 Which external entities will have access to the information?**

No external entities will be given access to participant-level data.

**4 Notice and Access for Individuals**

The following questions are directed at how or whether the individual is notified of the scope of information collected. They also concern the individual's right to consent to uses of information, right to decline to provide information, ability to ensure the accuracy of the information collected, and right to access their information.

**.1 How will individuals be informed about what information is collected, and how this information is used and disclosed?**

Participants will know what information is being collected through the online ad literacy test and the screening questionnaire, because they are providing the information themselves. For students in the treatment group, parents are advised in the survey instructions that some game performance data is collected in order to track students' playing time and how much they engage with the game.

**.2 Do individuals have the opportunity and/or right to decline to provide information?**

Participation in the Admongo evaluation is voluntary. Participants are drawn from the market research contractor's existing pools of Internet panelists, and parents may decline to participate in this particular study on behalf of themselves or their children.

**.3 Do individuals have the right to consent to particular uses of the information? If so, how would an individual exercise this right?**

No. By participating in the evaluation, parents agree to have their and their children's answers included in the evaluation data and cannot choose particular uses of their information.

**.4 What are the procedures that allow individuals to gain access to their own information?**

The market research contractor does not allow participants to request access to their information. All other recipients of the information—including FTC staff, the children's marketing consultants, and the web development firm—will only obtain data that is identified by study ID, without any personal identifiers, and therefore do not have the ability to provide participants with access to their information.

- .5 Discuss the privacy risks associated with the process of providing individuals access to their own records and how those risks are mitigated.**

Not applicable.

## **5 Web Site Privacy Issues**

Complete this section only if the new system or project creates or modifies an FTC Web site, page, or online form accessible through the Internet.

- .1 Describe any tracking technology used by the Web site and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, Web beacon). Currently, persistent tracking technology is not approved for use by the FTC (see 5.2).**

Unlike the standard Admongo.gov website, the Admongo game website set up specifically for this evaluation will not use cookies for Google Analytics. No other tracking technology will be used on the evaluation-specific Admongo game website.

The market research contractor's website that hosts the ad literacy test and the parental questionnaire will use both session and persistent cookies for purposes such as website customization, enabling survey participation, and analytics. The data that the market research contractor collects through cookies on that website will not be shared with the FTC.

- .2 If a persistent tracking technology is used, ensure that the proper issues are addressed (issues outlined in the FTC's PIA guide).**

Not applicable. As noted above in Section 5.1, the evaluation-specific Admongo game website will not use persistent tracking technology, and the market research contractor will use persistent tracking technology only for its own purposes.

- .3 If personal information is collected through a Web site, page, or online form accessible through the Internet, is appropriate encryption used? If not, explain.**



As explained in more detail in the [Admongo PIA](#), encryption is not necessary for the evaluation-specific Admongo website because information is submitted voluntarily and is not sensitive. Encryption is also not necessary for the market research contractor’s website that hosts the ad literacy test and the parental questionnaire, because the types of information collected—test answers and general demographic, financial, and family information—pose a low risk to privacy.

**.4 Explain how the public will be notified of the Privacy Policy.**

As explained in more detail in the [Admongo PIA](#), the evaluation-specific Admongo website will notify the public about the Admongo.gov Privacy Policy on the home page and in the footer of each game page and text-based page. A link to the FTC’s privacy policy will also be included on the first page of the parental questionnaire.

**.5 Considering any Web site or Internet issues, please describe any privacy risks identified and how they have been mitigated.**

As noted in Section 2.8, the game performance data for students in the treatment group is limited to the information necessary to determine the extent to which the students have engaged with the Admongo game. In addition, as noted in Section 5.3, the information collected through the ad literacy test and the parental questionnaire pose a low risk to privacy.

**.6 If the Web site will collect personal information from children under 13, or be directed at such children, explain how it will comply with the Children’s Online Privacy Protection Act (COPPA).**

As explained in more detail in the [Admongo PIA](#), the collection of data on the evaluation-specific Admongo website is exempt from COPPA’s requirement for verifiable parental consent because its sole purpose is to provide support for the internal operations of the website. The market research contractor’s website that hosts the ad literacy test and the parental questionnaire is similarly exempt from COPPA’s verifiable parental consent requirement, because personal information is not being collected from children. The responses to the ad literacy test do not allow children to submit personal information. Although the market research contractor will collect IP addresses, the evaluation is structured so that the parent is asked to

first fill out the parental questionnaire and then bring the child to the computer to complete the Admongo game (if applicable) and ad literacy test. Thus, the IP addresses collected are those of the parent's computer and are not collected from the child.

## **6 Security of Information in the System**

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

### **.1 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured?**

For information received by agency staff, the FTC follows all applicable Federal Information Security Management Act (FISMA) requirements to ensure that information collected for the Admongo evaluation is appropriately secured. The FTC's contract with its direct contractor (the web development firm) contains the privacy and data security provisions normally incorporated into the FTC's contracts, such as limitations on sharing and breach reporting obligations. Moreover, the children's marketing consultants have signed the FTC's standard nondisclosure agreement.

### **.2 Has a Certification & Accreditation been completed for the system or systems supporting the program?**

The evaluation-specific Admongo game website is part of the FTC's Public WEB Hosting General Support System (GSS), which has been authorized to process at the moderate level as described in the [Admongo PIA](#). In addition, the standard privacy provisions in the FTC's contracts require that certain security and privacy controls – such as limitations on sharing and breach reporting obligations – be in place when contractors handle personal information.

### **.3 Has a risk assessment been conducted on the system?**

The same risk assessment described in the [Admongo PIA](#) applies to the evaluation-specific Admongo game website. In addition, the standard privacy provisions in the FTC's contracts require that certain security and

privacy controls – such as limitations on sharing and breach reporting obligations – be in place when contractors handle personal information.

**.4 Does the project employ technology that may raise privacy concerns? If so, please discuss its implementation.**

Yes, and the FTC has addressed risks and vulnerabilities as described elsewhere in this document. *See, e.g.*, Section 2.8.

**.5 What procedures are in place to determine which users may access the system and are they documented?**

FTC staff and contractors will have access to the information only as needed. Only individuals tasked with retrieving or analyzing the information to measure the effectiveness of the Admongo game and to plan improvements to the game will have access to the information.

**.6 Describe what privacy training is provided to users either generally or specifically relevant to the program or system.**

All FTC staff and all contractors with network access are required to complete computer security training and privacy awareness training when they are on-boarded and then annually thereafter.

**.7 What auditing measures and technical safeguards are in place to prevent the misuse of data?**

The auditing measures and technical safeguards applicable to the evaluation-specific Admongo game website are described in the [Admongo PIA](#). In addition, the standard privacy provisions in the FTC's contracts require contractors to follow specified safeguards, such as limitations on sharing and breach reporting obligations.

**.8 To whom should questions regarding the security of the system be directed?**

Any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.

**7 Data Retention**

This section addresses for how long data is maintained, and how and when it is disposed of.

**.1 For what period of time will data collected by this system be maintained?**

The web development firm will delete its copy of the data once the evaluation is completed. The market research contractor will delete its copy of the data after nine months. The children's marketing consultants will retain its copy of the information for up to a year. FTC staff will keep the data in accordance with FTC record retention policies.

**.2 What are the plans for destruction or disposal of the information?**

All data will be deleted/destroyed in accordance with Office of Management and Budget, NARA, and National Institute of Standards and Technology regulations and guidelines.

**.3 Describe any privacy risks identified in the data retention and disposal of the information, and describe how these risks have been mitigated.**

Because the evaluation is not intended to collect PII, there are no significant privacy risks associated with the FTC's disposal of evaluation data. As previously noted, the data provided to the web development firm, the children's marketing consultants, and to the FTC will be identified only by study IDs, without any other personal identifiers that could be used to identify individual participants. Only the market research contractor will have access to the information that relates a participant's study ID to his or her PII, and the market research contractor's access to this information is based on the market research contractor's preexisting relationship with the participants.

## **8 Privacy Act**

This section addresses the applicability of the Privacy Act of 1974 to the system, and whether or not the system is covered by a System of Records Notice (mandated for some systems by the Privacy Act of 1974).

**.1 Will the data in the system be retrieved by a personal identifier?**

No.

**.2 Is the system covered by an existing Privacy Act System of Records notice (SORN)?**

Not applicable.

## **9 Privacy Policy**

This section confirms that the information handling practices of the system are consistent with the FTC's privacy policy.

**.1 Confirm that the collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC's privacy policy.**

The collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC privacy policy.

## 10 Approval and Signature Page

Prepared for the Business Owners of the System by:

\_\_\_\_\_ Date: \_\_\_\_\_  
Josephine Liu, Attorney  
Office of the General Counsel

Review:

\_\_\_\_\_ Date: \_\_\_\_\_  
Alexander C. Tang, Attorney  
Office of the General Counsel

\_\_\_\_\_ Date: \_\_\_\_\_  
Katherine Race Brin  
Chief Privacy Officer

\_\_\_\_\_ Date: \_\_\_\_\_  
Jeffrey Smith  
Chief Information Security Officer

\_\_\_\_\_ Date: \_\_\_\_\_  
Jeff Nakrin  
Director, Records and Filings Office

Approved:

\_\_\_\_\_ Date: \_\_\_\_\_  
Raghav Vajjhala  
Chief Information Officer