Office of Government Ethics

**Organizational Health Indicators Workbook
Privacy Impact Assessment**

March 2024
Compliance Division

U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for Organizational Health Indicators Workbook

Provide electronic copies of the signed PIA to OGE's Chief Information & Cybersecurity Officer and Privacy Officer.

Name of Project/System: Organizational Health Indicators Workbook
Office: Compliance Division

Executive Summary

This PIA covers the collection and maintenance of data requested from new and separating employees regarding remote work/telework, reasons for accepting employment at OGE, and reasons for departing from OGE, which will enable OGE to conduct organizational health reviews. Some information maintained in the workbook will be collected through OGE's Exit Clearance Survey, which has its own PIA.

A. **CONTACT INFORMATION:**

1) **Who is the person completing this document?**

   Nicole Stein
   Branch Chief, AAB
   nstein@oge.gov
   202-482-9255
   202-482-9228

2) **Who is the system owner?**

   Nicole Stein
   Branch Chief, AAB
   nstein@oge.gov
   202-482-9255

3) **Who is the system manager?**

   Kaneisha Cunningham
   Senior Administrative Officer
   Compliance Division, Administrative Operations Branch
   ktcunnin@oge.gov
   202-482-9228

4) **Who is the Chief Information Security Officer (CISO) who reviewed this document?**

Ty Cooper
Chief Information Officer & Cybersecurity Officer
Information Technology Division
jtcooper@oge.gov
(202) 482-9226

5) Who is the Senior Agency Official for Privacy who reviewed this document?

Diana J. Veilleux
Senior Agency Official for Privacy
Chief, Legal, External Affairs and Performance Branch
Diana.veilleux@oge.gov
202-482-9203

6) Who is the Reviewing Official?

Ty Cooper
Chief Information Officer & Cybersecurity Officer
Information Technology Division
jtcooper@oge.gov
202-482-9226

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes.

a. Is this information identifiable to the individual?

No names are included in the workbook. However, due to OGE's small size it may be possible to identify the individuals in question.

b. Is the information about individual members of the public?

No, this workbook will capture information that was completed by new employees after they have joined OGE and departing OGE employees before their separation date.

c. Is the information about employees?

Yes.

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

The purpose is to collect and maintain information from new employees about reasons they accepted a position at OGE and from separating employees about the reasons they are leaving OGE. This will enable OGE to conduct organization health reviews per OMB Memorandum M-23-15, Measuring, Monitoring, and Improving Organizational Health and Organizational Performance in the Context of Evolving Agency Work Environments (April 13, 2023).

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

5 U.S.C. 3101 and chapter 131; Executive Orders 13988 and 14035.; OMB Memorandum M-23-15, Measuring, Monitoring, and Improving Organizational Health and Organizational Performance in the Context of Evolving Agency Work Environments (April 13, 2023).

C. **DATA in the SYSTEM:**

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

Current OGE employees. Their information may remain in the system after they leave OGE.

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

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?**

Information is collected from the Exit Clearance Survey, from HR data provided by the Bureau of Fiscal Service, and directly from the employee by the Administrative Officer during onboarding. The HR data is collected from the employee by the Bureau of Fiscal Service.

b. **What federal agencies provide data for use in the system?**

Some information will come from Bureau of Fiscal Service (BFS), OGE's Human Resources Contractor.

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

Not applicable.

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

Not applicable.

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

No information will be collected from the public. Information collected from employees, either directly or indirectly (via BFS), includes branch, grade range, work status, onboard or departure date, prior and current locality, prior employment, if flexibilities were a factor in accepting a position at OGE, and reasons for departure.

3) Accuracy, Timeliness, Reliability, and Completeness

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

Respondent employees are responsible for providing accurate information.

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

The Administrative Officer will verify that a separating employee completes the survey during the exit clearance process. The Administrative Officer will also ensure that incoming employees provide certain information during their orientation. The Chief of the Agency Assistance Branch will review the workbook to identify if any fields have not been completed.

c. **Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?**

Not applicable. The data is intended to be current when collected only.

d. **Are the data elements described in detail and documented?**

No, however, the data elements are simple and self-explanatory.

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?

Yes.

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?**

    No. The workbook does not the list the individual's name.

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

    No.

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

    Not applicable.

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

    Access to the workbook will be limited to the Administrative Officer and supervisors.

7) **If data is being aggregated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

    Access to the workbook will be limited to the Administrative Officer and supervisors.

8) **How will the data be retrieved? Does a personal identifier retrieve the data?**

    The data will be retrieved by the fields listed below. The information will not be retrieved by personal identifier.

    Fiscal Year
    Branch
    Grade Range
    Status (New Hire, Departure, Change in Locality)
    Onboard or Departure Date
    Work Status
    New Hire: Prior Locality (OPM localities)
    New Hire: Prior Employment (Open Field)
    Whether workplace flexibilities were a contributing factor in coming to OGE or separating from OGE

Cost savings from a change in locality
Departing Employee: Reasons for Departure

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

  The workbook can be filtered to show trends. All individuals with access to the workbook (Administrative Officer and supervisors) have access to this feature. However, the data is not tied to identifiable individuals.

10) What opportunities do individuals have to decline/refuse 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)?

  Completing the exit survey is mandatory and part of the exit clearance process. Other information is collected during the onboarding process, and the responding individual could decline to answer the questions. Respondents have no opportunity to consent to particular uses.

E. <u>MAINTENANCE AND ADMINISTRATIVE CONTROLS:</u>

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?

  Not applicable.

2) Is the data in the system covered by existing records disposition authority? If yes, what are the retention periods of data in this system?

  Yes, the information is covered by National Archives and Records Administration (NARA) General Records Schedules (GRS) 2.2 Employee Management Records, item 020 Workforce and succession planning records. The retention period is Temporary. Destroy three years after issuing each new plan but longer retention is authorized if required for business use.

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?

  Timely destruction of federal records is the responsibility of the OGE Records Officer. The reports are temporary and will be destroyed when no longer needed for business purposes, in accordance with NARA disposition authority DAA-GRS-2014-0004-0001. OGE's records management policies document the procedures for disposition of Federal records.

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

    No.

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

    Not applicable.

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

    No.

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

    Not applicable.

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

    There will be limited access to the workbook.

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

    The workbook is not a Privacy Act system of records. The Exit Clearance Survey is subject to OGE/INT-8, Employee Personnel Files Not Covered by Other Notices, and displays a Privacy Act statement.

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

    No.

F. **ACCESS TO DATA:**

1) **Who will have access to the data in the system?**

    The Admin Officer and the Supervisors will have access to the workbook on OGE's network.

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

The AAB Branch Chief is responsible for controlling access to the workbook. The workbook will be saved to the AAB Branch Chief's One Drive. The Branch Chief will establish controls in the application to restrict access to Administrative Officer and OGE's leadership team only.

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

Authorized users have access to all the data in the workbook.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

All individuals who have access to the workbook are authorized to view all information in the workbook; therefore, there is no possibility for unauthorized access.

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?**

No.

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?**

Not applicable.

8) **Will other agencies share data or have access to the data in this system (Federal, State, or Local)?**

No.

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

Not applicable.

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

Each authorized user is responsible for assuring proper use of the data collected.

The Following Officials Have Approved the PIA for Organizational Health Indicators Workbook:

1) **System Owner**

   Electronic
   Signature:

   Name: Nicole Stein
   Title: Branch Chief, Agency Assistance Branch

2) **Chief Information & Cybersecurity Officer**

   Electronic
   Signature:

   Name: Ty Cooper
   Title: Chief Information Officer & Cybersecurity Officer, Information Technology
       Division

3) **Senior Agency Official for Privacy**

   Electronic
   Signature:

   Name: Diana Veilleux
   Title: Chief, Legal, External Affairs and Performance Branch and Senior Agency Official
       for Privacy