

Office of Government Ethics

Summit Registration Management Portal

January 2020

Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
Summit Registration Management Portal**

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

Name of Project/System: Summit Registration Management Portal

Office: Agency Assistance Branch

A. CONTACT INFORMATION:

1) Who is the person completing this document

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2) Who is the system owner

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3) Who is the system manager for this system or application

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

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

Diana J. Veilleux
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6) Who is the Reviewing Official?

Ty Cooper
Chief Information Officer
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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes, it contains information of federal employees and/or members of the public who have been invited to attend or present at the OGE-hosted Summit.

a. Is this information identifiable to the individual?

Yes.

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

Yes.

c. Is the information about employees?

Yes.

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

The information collected is necessary for people to register online to attend or present at OGE's National Government Ethics Summit.

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

The Summit Registration Management Portal is developed by OGE's staff to automate OGE's compliance with records management requirements under authority of 44 U.S.C. § 3101, as amended. OGE has authority to organize training events like the National Government Ethics Summit pursuant to the Ethics in Government Act, 5 U.S.C. app. § 402.

C. DATA in the SYSTEM:

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

Federal employees and/or members of the public who have been invited to attend or present at the OGE-hosted Summit.

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

The information in the system is provided by the individuals registering or an organization registering on behalf of their employees.

- 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?**

In some instances the information is provided directly, in others the information is imported as an XLS file into the application from pay.gov. The information from pay.gov is provided directly by the individuals registering or an organization registering on behalf of their employees.

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

All executive branch federal agencies potentially provide data for use in the system.

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

When state or local agencies or ethics commissions are invited to attend an OGE-hosted Summit, they are required to provide data for use in the system.

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

Other organizations such as non-governmental organizations, academic institutions, or Congressional offices may provide registration information on behalf of their employees.

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

Collected information will include information such as name, agency/organization, address, telephone number, email address, state, city or town, country, number of years worked in the field of ethics, and special accommodations requests.

3) Accuracy, Timeliness, Reliability, and Completeness

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

OGE does not check for accuracy of the provided records. As the data in the system is provided by registering individuals or from organizations registering on behalf of their employees, it is the registrants' responsibility to provide OGE with accurate and complete information.

b. How will data be checked for completeness?

As the data in the system is provided by registering individuals or from organizations registering on behalf of their employees, it is the registrants' responsibility to provide OGE with accurate and complete information. The registration form has certain required fields, which ensures that OGE is provided with complete and required information for registration. Furthermore, individuals have an opportunity to contact the system manager if they need to make changes to any provided information after completing the registration.

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

N/A. The data is intended for one-time use with regard to registration for the OGE-hosted Summit; once the registration is completed the data is maintained for historical purposes 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?**

N/A.

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

N/A.

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

N/A.

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

N/A.

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

N/A.

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

Data can be retrieved in a variety of ways, including by name and by agency.

- 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 system can produce a list of the agencies and individuals attending, which will be used to manage the registration process and provide statistical data. All authorized users of the system will have access to the reporting function.

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)?

Individuals who want to participate in the OGE-hosted Summit do not have any opportunity to decline to provide the information or to consent to particular uses of the information on the registration form. The information is necessary for registration.

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?

N/A.

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?

These records are retained in accordance with General Records Schedule 6.4, item 010, Public affairs-related routine operational records. The records are destroyed when 3 years old, or no longer needed, whichever is later.

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 Records Officer. The reports are temporary and will be destroyed pursuant to the disposition authority.

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?

The information to be collected is not of a sensitive nature and is of the type routinely provided by or collected from participants of organized events, such as a participant's name, employing agency or entity, and contact information. Providing the information is purely voluntarily, and attendance at these events is voluntary. There are sufficient controls in place to appropriately secure the information. Accordingly, OGE

has determined that the system of records does not impose a significant risk to the privacy of individuals.

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?

N/A.

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

N/A.

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

OGE/INTERNAL-6, Online Registration for OGE-Hosted Meetings and Events. Note that the system of records notice for OGE/INTERNAL-6 includes several routine uses, including the authority to release information to other attendees and event vendors.

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

The Privacy Act system of records will not require amendment or revision.

F. ACCESS TO DATA:

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

Only OGE employees involved in registration of the event will have access to the data in the system. Access is controlled by the Account Access Request Form process described below.

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

Access to OGE applications is governed by the Account Access Request Form (AARF) process, which authorizes the Information Technology Division (ITD) to create, modify, and disable network accounts, including providing access to OGE applications. AARF requests must be signed by the employee, his/her supervisor, and the Chief Information Officer before a request is approved to be implemented by ITD staff.

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

Authorized users will have access to all data in the application.

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

Authorized users have been advised that agency policy prohibits them from unauthorized browsing of data and have been instructed not to engage in such activities.

- 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 contractors were involved with the design, development, or maintenance of the application.

- 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.

- 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?**

N/A.

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

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

**The Following Officials Have Approved the
PIA for the Online Registration for OGE-Hosted Events and Conferences:**

1) System Manager

Nicole Stein (Signature) 1/8/2020 (Date)

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

2) System Owner

Shelley Finlayson (Signature) 1/15/20 (Date)

**Name: Shelley Finlayson
Title: Chief of Staff & Program Counsel**

3) Chief Information Officer

Ty Cooper (Signature) 01/13/2020 (Date)

**Name: Ty Cooper
Title: Chief Information Officer**

4) Senior Agency Official for Privacy

Diana Veilleux (Signature) 1/6/2020 (Date)

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