

# **Office of Government Ethics**

## **Wisdom Share Privacy Impact Assessment**

November 2023  
**Program Counsel Division**

**U.S. Office of Government Ethics (OGE)**  
**Privacy Impact Assessment (PIA) for Wisdom Share Mentoring Platform**

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

**Name of Project/System:** Wisdom Share Mentoring Platform

**Office:** Agency Assistance Branch

**Executive Summary**

Wisdom Share Mentoring Software (Wisdom Share) is a web-based application that is used to provide a formal approach to support mentoring relationships within the OGE ethics community. OGE uses Wisdom Share to enable employees and individuals outside of the agency, including agency ethics officials, to communicate and collaborate with each other to build a mentoring relationship. Wisdom Share is specifically designed to work with organizations looking to easily and effectively match thousands of participants who are diverse in terms of geography, function and interests. It offers customized content and design, robust reporting, and calendars/action planning tools to help participants stay on track. WisdomShare’s online privacy policy is available [here](#).

Wisdom Share uses a matching algorithm that will develop a percentage-ranked mentor/mentee match based on information that participants provide. The matching process is an opportunity to work with a mentor that can best support the mentee’s developmental needs. Mentors and mentees will be asked to identify specific skills, competencies, and areas of interest that they want to build or enhance through the course of the relationship with their mentor.

This PIA covers OGE’s practices regarding the use of Wisdom Share for mentoring support, including the collection and the use of personally identifiable information (PII) as part of the profile creations within Wisdom Share.

**A. CONTACT INFORMATION:**

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

Kehli Cage  
Ethics Specialist  
Agency Assistance Branch  
Program Counsel Division  
[kcage@oge.gov](mailto:kcage@oge.gov)  
202-482-9279

Nicole Stein  
Chief, Agency Assistance Branch  
Program Counsel Division  
[nstein@oge.gov](mailto:nstein@oge.gov)

(202) 482-9255

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

Nicole Stein  
Chief Agency Assistance Branch  
Program Counsel Division  
[nstein@oge.gov](mailto:nstein@oge.gov)  
(202) 482-9255

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

Nicole Stein  
Chief Agency Assistance Branch  
Program Counsel Division  
[nstein@oge.gov](mailto:nstein@oge.gov)  
(202) 482-9255

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

Ty Cooper  
Chief Information & Cybersecurity Officer  
Information Technology Division  
[jtcooper@oge.gov](mailto: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 and  
Chief, Legal, External Affairs and Performance Branch  
Program Counsel Division  
[Diana.veilleux@oge.gov](mailto:Diana.veilleux@oge.gov)  
202-482-9203

**6) Who is the Reviewing Official?**

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

**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

**1) Does this system contain any information about individuals?**

Yes, it contains information about federal government employees who are a part of the larger ethics community and who opt for participation.

**a. Is this information identifiable to the individual?**

Yes.

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

No.

**c. Is the information about employees?**

Yes.

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

OGE uses Wisdom Share to enable OGE employees and federal government employees outside of the agency, including those who are a part of the larger federal ethics community, to communicate and collaborate with each other to build a mentoring relationship. See the Executive Summary above for more information.

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

The Ethics in Government Act of 1978, as amended, authorizes the Director of OGE to provide overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive agency. See 5 U.S.C. § 13122. The application also supports OGE's responsibility to support agency ethics officials through such training, advice, and counseling as the Director of OGE deems necessary. See 5 C.F.R. § 2638.108(a)(5). In addition, the mentorship program is part of OGE's DEIA Strategic Plan pursuant to Executive Order 14035.

**4) What protections are in place to secure sensitive PII?**

All data that is accepted and saved by Wisdom Share is protected by numerous methods, including routing through a managed Website Application Firewall (WAF), enforcing end-to-end TLS 1.2+ encryption, and being encrypted at rest.

Access to the application is restricted to two OGE employees identified as administrators. No information is downloaded to OGE's network; the information is stored and viewed within the application.

**C. DATA in the SYSTEM:**

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

- OGE employees
- Employees of other federal agencies

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

The information is collected from the individual.

- 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?**

Directly from the individual.

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

N/A.

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

N/A

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

N/A.

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

All participants will have to create a user ID and password to access Wisdom Share. See Appendix A for a list of fields. Users will also be asked to respond to surveys asking about their satisfaction with the program and progress toward meeting their goals. Participation in the surveys is voluntary.

**3) Accuracy, Timeliness, Reliability, and Completeness**

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

The individual user is responsible for providing accurate information in their profile.

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

See above.

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

The individual user is responsible for maintaining the accuracy of the information on their profile.

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

See Appendix A.

**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?**

The application will not aggregate the information collected with other information about the individual users to derive new data or create previously unavailable data.

**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?**

No.

**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, the data is not being aggregated.

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

OGE may retrieve the information by personal identifier or other data points.

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

Yes. See Appendix B for a list of reports. Only OGE administrators with access to the application will have access to the reports.

- 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)?**

Participation in the program is voluntary, but in order to participate individuals must provide the requested information. They cannot consent to particular uses of the information.

**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 covered by GRS 2.6, item 030, Individual employee training records. The records should be destroyed when superseded, three years old, or one year after separation, whichever comes first, 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 Agency Records Officer. The reports are temporary and will be destroyed when they are no longer needed by the agency for business use. The procedures are documented in OGE's record's management policies.

**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 minimal impact on employee privacy is justified by the potential benefit to users. Individuals who choose to participate voluntarily provide the information necessary to participate.

**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, Registration and Administration Records for OGE-Hosted Meetings, Events, Educational and Training Programs, and Professional Development Offerings. The application will display a Privacy Act statement.

**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?**



Externally, individual users who have been approved by OGE to participate in the mentoring program will have access to their own data and information regarding the mentor or mentee with whom they are matched. Two OGE administrators will have access to all the data in the system.

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

Individuals approved to participate in the program will receive an email with a link to the application to create their unique profiles. Access to OGE administrator roles is managed by the Agency Assistance Branch (AAB), and all users will be approved by the Chief of AAB.

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

Appendix A describes which users can access the various information fields in the application.

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

Users only have access to data they are authorized to access. Authorized users of the application have been advised that agency policy prohibits them from unauthorized use of the 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?**

This is a third party application. OGE was not involved in design or development.

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

There is no direct interface with other applications or systems. The application has e-mail address information to send invitations, notifications and calendar items to participants directly from the application.

**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 OGE user is responsible for assuring proper use of the data collected. Authorized users of the application have been advised that agency policy prohibits them from unauthorized use of the data and have been instructed not to engage in such activities.

**See Attached Approval Page**

**The Following Officials Have Approved the PIA for Wisdom Share:**

**1) System Manager**

Name: Nicole Steinnes  
Title: Chief  
Agency Assistance Branch

**2) System Owner**

Name: Nicole Stein  
Title: Chief  
Agency Assistance Branch

**3) Chief Information Officer**

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

**4) Senior Agency Official for Privacy**

Name: Diana Veilleux DJV  
Title: Chief  
Legal, External Affairs and Performance Branch  
Program Counsel Division

## APPENDIX A

**This appendix lists the fields that are associated with a user (mentee/mentor) profile as well as who has access to view each field.**

Fields	Type of Field and Associated Drop Down Options (if applicable)	Who Can View
First Name	Open Text	User, Admin, and Other Users
Middle Name	Open Text	User, Admin, and Other Users
Last Name	Open Text	User, Admin, and Other Users
Job Title	Open Text	User, Admin, and Other Users
Phone Number (Work)	Open Text	User, Admin, and Other Users
Preferred Pronoun (open text)	Open Text	User, Admin, and Other Users
Grade Level or Equivalent	Drop Down <ul style="list-style-type: none"> <li>○ GS-7</li> <li>○ GS-9</li> <li>○ GS-11</li> <li>○ GS-12</li> <li>○ GS-13</li> <li>○ GS-14</li> <li>○ GS-15</li> <li>○ SES</li> </ul>	User and Admin
Years as an Ethics Official	Drop Down <ul style="list-style-type: none"> <li>○ Less than 1 year</li> <li>○ 1-4 years</li> <li>○ 5-10 years</li> <li>○ More than 10 years</li> </ul>	User, Admin, and Other Users

Years at Agency*	Drop Down <ul style="list-style-type: none"> <li><input type="radio"/> Less than 1 year</li> <li><input type="radio"/> 1-4 years</li> <li><input type="radio"/> 5-10 years</li> <li><input type="radio"/> More than 10 years</li> </ul>	User, Admin, and Other Users
Agency Name	Drop Down List of Executive Branch Agencies	User, Admin, and Other Users
Are you a supervisor	Drop Down <ul style="list-style-type: none"> <li><input type="radio"/> Yes</li> <li><input type="radio"/> No</li> </ul>	User, Admin, and Other Users
Are you part of an underserved community?	<ul style="list-style-type: none"> <li><input type="radio"/> Yes</li> <li><input type="radio"/> No</li> </ul>	User and Admin
Location	<ul style="list-style-type: none"> <li><input type="radio"/> DMV</li> <li><input type="radio"/> Outside DMV</li> </ul>	User, Admin, and Other Users
Education	<ul style="list-style-type: none"> <li><input type="radio"/> Attorney</li> <li><input type="radio"/> Non-Attorney</li> </ul>	User, Admin, and Other Users

Field: Functional Areas of Interest  
Who Can View: User, Admin, Other Users

Options: Multiple Choice

Advice and Counsel	Building Ethical Culture
--------------------	--------------------------

Career Development	Confidential Financial Disclosure
Ethics Education Training	Ethics Program Management
Public Financial Disclosure	Special Government Employees
Special Government Employees	Tracking Systems

Field: Skills and Competencies  
Who Can View: User, Admin, Other Users

Options: Multiple Choice

Active Listening	Building Coalitions
Business Acumen	Career Planning
Coaching and Developing Others	Complex Financial Instruments
Conflict Management	Delivering Training
Ethics Laws and Regulation	Having tough conversations
Influencing/ Persuasion	Innovation/ Creativity
Interpersonal Skills	Leading Change
Leading People	Legal Research
Managing Change	Negotiation Skills

Oral Communications	Strategic Communications
Team Building	Work/Life Balance
Written Communications	

Field: Mentee- Mentor Background and Expertise

Who Can View: User, Admin, Other Users

Options: Multiple Choice

Building a team	Career Transition - from ethics official to ADAEO/DAEO
Implemented a new tracking systems	Implemented a confidential electronic disclosure system
Implemented a large-scale change	Interpersonal skills - the How
Leading a large program	Leading a mid-size program
Leading a small program	Reorganization/Turn-Around Management Experience
Translating the ethics rules for a broad audience	

Field: Discussion Topics

Who Can View: User, Admin, Other Users

Options: Multiple Choice

I am interested in becoming more resilient.	I am interested in broadening my perspective.
---	---

I am interested in discussing career planning and advancement.	I am interested in learning more about a particular functional area.
I need better work/life balance.	I would like an objective person to provide constructive feedback.
I would like help with managing my time with competing priorities.	I would like help with providing meaningful feedback to others.
I would like to be a better manager.	I would like to improve my influencing, negotiation and conflict management skills.
I would like to improve my interpersonal skills.	I would like to polish my presentation skills.
I would like to understand how to manage my stress better.	I would like to understand how to motivate others.
I would like to understand how to navigate the politics of an agency.	I'd like to build stronger professional networks within the executive branch.

Field: Chemistry Quotient  
Who Can View: User and Admin

Options: Multiple Choice

I tend to be more social and outgoing. I like to work with others.
I tend to be more quiet and reserved. I like to work independently.
I make decisions quickly based on my personal feelings.
I like to think carefully before making a decision.



I learn by taking action or discussing ideas.
I like to learn by reflecting on ideas.
I like to analyze problems and look at situations logically.
I prefer to look at patterns and how a decision can impact others.
I allow for adjustments in my short and long-term planning in case new opportunities arise.
I try to follow my plans closely.

Field: Working Motivators

Who Can View: User, Admin, Other Users

Options: Multiple Choice

I adapt to change quickly.	I am able to influence others.
I am competent.	I am making decisions that address risk.
I am shown respect for what I do.	I can do many tasks.
I can keep my head in high risk situations.	I cooperate with others to get the job done.
I don't mind working hard to forward our mission.	I enjoy leading others.
I enjoy the mission.	I enjoy what I do.
I feel I have accomplished something.	I have expertise in a certain area.

I have the power to make things happen.	I like to pay it forward.
I make commitments and keep them.	I make decisions that impact many lives.
I want to serve.	I work well with my team.
Leading a balanced life is important to me.	Others express or show their loyalty.
Others find me helpful.	Others show appreciation for what I do.

Field: Hobbies and Interests

Who Can View: User, Admin, Other Users

Options: Multiple Choice

Arts and Crafts	Boating / Water Sports	Camping
Cars / Motorcycle	Civic Activities	Coaching Sports
Computers	Cooking	Design
Dining Out	Family Activities	Fine Arts
Fishing	Fitness	Gardening
Golf	Movies	Music
Reading	Traveling	

## APPENDIX B

This Appendix includes a list of each report contained within the application as well as the fields associated with that report. The reports are only available for administrators to view.

### **Report:** *Manage Users*

#### **Fields:**

- Mentor
- Mentee
- UserID
- First Name
- Last Name
- Email Address
- First Login Date
- Registration Status
- Unregistered
- Registered
- Matches
- Not Matched
- Application Status
- Grade Level or Equivalent

### **Report:** *Manage Matches*

#### **Fields**

- Match type
- Senior Role
- Senior Name
- Junior Role
- Junior Name
- Match Status
- Initiated By
- Current Milestone
- Match start Date
- Match End Date

**Report:** *Mentees with Complete Match Profiles*

**Fields:**

- userID
- Userlink
- Username
- First Name
- Last Name
- Email
- Job Level
- Available to Match
- Created on Date

**Report:** *Mentees with Incomplete Match Profiles*

**Fields:**

- userID
- Userlink
- Username
- First Name
- Last Name
- Email
- Job Level
- Department
- Available to Match
- Created on Date

**Report:** *Mentor with Complete Match Profiles*

**Fields:**

- userID
- Userlink
- Username
- First Name
- Last Name
- Email
- Job Level
- Department
- Available to Match
- Created on Date

**Report:** *Mentors with Incomplete Match Profiles*

**Fields:**

- userID
- Userlink
- Username
- First Name
- Last Name
- Email
- Job Level
- Available to Match
- Created on Date

**Report:** *Mentors Without a Match Profile*

**Fields:**

- userID
- Userlink
- Username
- First Name
- Last Name
- Email
- Job Level
- Available to Match
- Created on Date

**Report:** *User Activity*

**Fields:**

- UserID
- UserLink
- Username
- Mentor
- Mentee
- First Name
- Last Name
- Email
- Available to Match
- Registration Status
- Created on Date
- Application Status
- Job Level

- Last Activity Date
- Last Login Date
- First Invite Date
- Group

**Report:** *UserDetail*

- userID
- userlink
- username
- mentor
- mentee
- FirstName
- LastName
- Email
- Available to Match
- Registration Status
- Created on Date
- Application Status
- Department
- Job Level
- Last Activity Date
- Last Login Date
- First Invite Date
- Match