

Office of Government Ethics
Privacy Impact Assessment for
OGE.gov

November 2016
Program Counsel Division

**U.S. Office of Government Ethics
Privacy Impact Assessment (PIA) for
OGE.gov**

Name of Project/System: OGE.gov
Office: Internal Operations Division

A. CONTACT INFORMATION:

- 1) Who is the person completing this document?** (Name, title, organization and contact information).

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- 2) Who is the system owner?** (Name, title, organization and contact information).

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- 3) Who is the system manager for this system or application?** (Name, title, organization, and contact information).

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- 4) Who is the Chief Information Security Officer who reviewed this document?** (Name, organization, and contact information).

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5) **Who is the Privacy Officer who reviewed this document?** (Name, organization, and contact information).

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6) **Who is the Reviewing Official?** (According to OMB, this is the agency CIO or other agency head designee, someone other than the official procuring the system or the official who conducts the PIA).

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

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

The Office of Government Ethics' (OGE) website at OGE.gov hosts biographies of senior agency leadership, as well as the publicly available financial disclosure documents of certain public officials required to file financial disclosures.

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, the information is about OGE employees (biographies) and federal government employees (public financial disclosure reports).

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

OGE.gov is the agency's website. It informs stakeholders about OGE and its activities, provides an opportunity to contact the agency, and makes available OGE's documents.

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

5 U.S.C app § 402. Authority and Functions, Ethics in Government Act.

C. DATA in the SYSTEM:

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

Executive branch employees.

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

Primarily, the information on the website comes from OGE employees; however, the website contains a limited number of financial disclosure forms received from non-OGE filers. There are also a number of statutes drafted by Congress and executive orders drafted by the White House listed on the website.

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?

Primarily, the information on the website comes from OGE employees; however, the website contains a limited number of financial disclosure forms received from non-OGE filers. There are also a number of statutes drafted by Congress and executive orders drafted by the White House listed on the website.

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?

None.

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

In general, OGE does not collect information from employees or the public that interact with the website (*e.g.* through the use of “cookies” placed on a user’s computer). The website does have a contact OGE feature where members of the public can submit questions via email, and other sections of the website allow members of the public to request access to information from OGE by submitting a written request. These features are addressed in the Agency Information

Management System (AIMS) PIA document, the Freedom of Information Act (FOIA) system PIA document, and the 201 Request system PIA document.

3) Accuracy, Timeliness, Reliability, and Completeness

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

In general, a website user does not enter data onto an OGE web page for inclusion into the website. With regard to interactive website features such as OGE's Contact OGE, OGE's FOIA Tracking system or OGE's online access to public financial disclosure reports, individuals provide data directly to OGE and OGE does not normally verify the accuracy of the information provided. For more specific information on these website aspects, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

b. How will data be checked for completeness?

In general, a website user does not enter data onto an OGE web page for inclusion into the website. With regard to interactive website features such as OGE's Contact OGE, OGE's FOIA Tracking system or OGE's online access to public financial disclosure reports, individuals provide data directly to OGE and OGE does not normally verify the accuracy of the information provided. For more specific information on these website aspects, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

The content published on the OGE website's pages is current as of the date of publication. Each division within OGE is responsible for ensuring that the information related to its division is current. The content management system incorporates an archive and expiration date feature, which allows a web page to be flagged for archiving at the moment it is created. For more specific information on the data that may be captured through OGE's Contact OGE feature, OGE's FOIA tracking system or OGE's online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA System PIA, and 201 System PIA.

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

As to the content that is included on the website pages this is N/A. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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?**

The website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

- 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 website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

- 3) Will the new data be placed in the individual's record?**

In general, OGE does not keep records of individuals who interact with the website. The website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

- 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?

The website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

The website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

The website, itself, is not a data capture tool. OGE utilizes web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

The website, itself, is not a data capture tool. OGE utilizes web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

In general, no reports can be produced on individuals through OGE's website. The website itself is not a data capture tool. OGE does use web analytics software to improve usability of the website, as addressed in the Social Media and Third Party Applications PIA, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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), and how individuals can grant consent.)

In general, this is inapplicable to the website, as it does not gather data on individuals. If an individual uses the contact OGE feature, he/she may decline to provide a name, phone number, email or mailing address. The input fields within this feature are not mandatory/required before a request can be submitted, and will not generate a system error if the data is not entered. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA. Additionally, for purposes of the web analytics applications, users can adjust their browser settings to decline "cookies." Refer to the "Use of Third-Party Websites and Applications" PIA for more information. These "cookies" do not, however, capture personally identifiable information on website users.

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?

OGE is presently drafting a records disposition authority for the website. Some of the records available on the website are covered under existing records disposition schedules.

- 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?**

OGE is presently drafting a records disposition authority for the website. Some of the records available on the website are covered under existing records disposition schedules. The website content management system contains an archive and expiration date feature. When a webpage is created, the archiving of that page can be “pre-scheduled.”

- 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?**

In general, use of the agency website does not affect privacy. In limited circumstances, and depending upon the information entered, some interactive features of OGE’s website may implicate privacy as addressed further in OGE’s AIMS PIA, FOIA tracking system PIA, and 201 System PIA.

- 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.**

N/A. In general, a system of record notice is not needed because information is not collected.

- 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?

OGE employees have access to the content posted on the website through a content management system. However, the website itself is not a data capture tool. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

OGE employees receive access to the content management system by OGE's Information Technology Operations Branch (ITOB). Access and permissions are granted via the Account Access Request Form (AARF) process. An approved AARF authorizes ITOB to create, modify, and delete accounts. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

OGE employees receive unrestricted access to the content management system in order to make updates or add additional content to the website. For more specific information on the data that may be captured through OGE's Contact OGE feature, FOIA tracking system or online system for access to public financial disclosure reports, please refer to OGE's AIMS PIA, FOIA PIA, and 201 System PIA.

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

In general, the content on OGE's website is publicly available without restriction.

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?

At this time, OGE does not employ employee contractors to maintain its website.

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?

N/A.

See Attached Approval Page

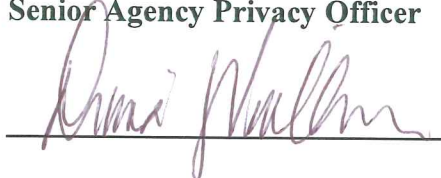
The Following Officials Have Approved this Document

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2) Senior Agency Privacy Officer

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