

Office of Government Ethics
Privacy Impact Assessment for OGE.gov

December 2023
Information Technology Division

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

Name of Project/System: OGE.gov
Office: Information Technology Division

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Nicole Stein
AAB Chief
Program Counsel Division
nstein@oge.gov
(202) 482-9255

2) Who is the system owner for this system or application?

Tony Upson
Deputy Chief Information Officer for Network Operations
Information Technology Division
tupson@oge.gov
(202) 482-9272

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

Zohair Baig
Deputy Chief Information Officer for
Web Operations
Information Technology Division
mzbaig@oge.gov
(202) 482-9311

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

Ty Cooper
Chief Information & 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
Chief, Legal, External Affairs and Performance Branch
Program Counsel Division
Diana.Veilleux@oge.gov
(202) 482-9203

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)

Ty Cooper
Chief Information & 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, OGE.gov serves as the public-facing website of the Office of Government Ethics (OGE). It contains the following types of information about individuals:

- Biographies of OGE senior agency leadership
- Biographies of presenters at OGE sponsored events (government and nongovernment)
- Official government contact information for certain OGE staff
- Official government contact information for agency ethics officials throughout the executive branch
- Official government contact information for legislative branch officials and employees, in the form of correspondence with such individuals
- Public financial disclosure reports and transaction reports for certain executive branch government officials
- Candidate public financial disclosure reports
- Ethics agreements and certifications of ethics agreement compliance submitted by certain executive branch government officials
- Certificates of Divestiture issued to executive branch employees
- Ethics pledge waivers granted to Presidential appointees subject to the

ethics pledge

- Names of FOIA requesters (FOIA Log)
- Information contained in FOIA-processed records
- Names of incumbents to certain Presidentially-appointed, Senate-confirmed positions (archival only, not updated)
- Names and travel information for executive branch employees submitted as part of Form 1353 travel reports
- Documents (reports and trust instruments) related to Legal Expense Funds created pursuant to Subpart J of the Standards of Conduct
- (Beginning in FY 2024) Information (name, position, agency, and type of waiver issued) regarding executive branch employees who have received a conflict of interest waiver pursuant to 18 U.S.C. § 208

a. Is this information identifiable to the individual?

Yes.

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

Some of the information includes information about members of the public, specifically FOIA requesters. See the list above. However, most of the information is about current and former executive branch employees.

c. Is the information about employees?

Yes, see the list above.

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 information relevant to the executive branch ethics program.

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

5 U.S.C § 13122.

C. DATA in the SYSTEM:

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

Current and former executive branch employees, current and former legislative branch employees and officials, members of the public.

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

Primarily, the information on the website pages originates from OGE employees or ethics officials at other executive branch agencies. The personally identifiable information (PII) in the ethics records originates from the individuals who are the subject of those records, often submitted via their employing agencies. The ethics records are pulled from OGE's Financial Disclosure Tracking System. See the Privacy Impact Assessments for the Financial Disclosure Tracking System and the OGE Form 201 Automated Submission and Response System for more information.

Information on FOIA requesters originates from the requesters themselves and is pulled from OGE's FOIA tracking system. See the Privacy Impact Assessment for the FOIA Tracking and Reporting Application for more information.

Information from OGE's Annual Questionnaire is pulled from the agency responses submitted through the Annual Questionnaire Application. Travel report information and agency ethics program contact information originate from the individuals' employing agencies. Official government contact information for Members of Congress and other individuals with whom OGE has corresponded originates from the individuals themselves or their official websites. Statistical information regarding the number of referrals received by OGE pursuant to 5 U.S.C. § 13122(e)(2) (not PII) is pulled from OGE's DOJ Referrals Form System (DORF). Information regarding regulations and statutes (not PII) is pulled from other federal websites.

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?

See above.

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

Potentially all executive branch agencies. The website also pulls information from Government Publishing Office sources such as the eCFR.

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

None.

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

None.

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

The PII published on OGE.gov is listed in response to question B.1. Most of this information is collected pursuant to OGE's mission as the oversight agency for the executive branch ethics program; it is not collected through the website nor specifically for publication on the website. OGE does not collect information from employees or members of the public who interact with the website (e.g. "cookies" or IP addresses).

The online OGE Form 201 system is the only portion of the website that collects information. The information in this system is addressed in the Privacy Impact Assessments for the OGE Form 201 Automated Submission and Response System and the Financial Disclosure Tracking System.

3) Accuracy, Timeliness, Reliability, and Completeness

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

As described above, most of the PII published on OGE.gov derives from OGE records. For information on the accuracy of the information collected through the online OGE Form 201 system, please refer to the Privacy Impact Assessment for the OGE Form 201 Automated Submission and Response System.

b. How will data be checked for completeness?

As described above, most of the PII published on OGE.gov derives from OGE records. For information on the completeness of the information collected through the online OGE Form 201 system, please refer to the Privacy Impact Assessment for the OGE Form 201 Automated Submission and Response System.

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

The ethics records, Congressional correspondence, and FOIA information published on OGE.gov are archival records that are not intended to be continuously maintained as current. With regard to the OGE biographical and contact information, each OGE division is responsible for ensuring that the information related to its division is

current. Information regarding agency ethics programs is updated based on regular data calls to those agencies.

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

As noted above, most of the information published on OGE.gov is collected pursuant to OGE's mission as the oversight agency for the executive branch ethics program; it is not collected through the website nor specifically for publication on the website. The online OGE Form 201 system is the only portion of the website that collects information. This system is addressed in the Privacy Impact Assessment for the OGE Form 201 Automated Submission and Response System.

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 website does not derive new data or create previously unavailable data about individuals through aggregation.

- 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?**

No data is being aggregated.

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

No data is being aggregated.

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

Most of the data is retrieved by website users browsing and searching the website. As discussed above, some of the information published on the website is maintained in other OGE information systems, including information retrieved by personal identifier. The information retrieved by personal identifier is subject to the OGE/GOVT-1 system of records notice.

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

No reports can be produced on individuals through OGE's website. OGE uses web analytics software to improve usability of the website, as addressed in the Privacy Impact Assessment for the Use of Third-Party Websites and Applications, but this merely captures general website usage statistics. This data allows OGE to improve the usability and performance of the website over time.

- 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. For information on the information collected through the online OGE Form 201 system, please refer to the Privacy Impact Assessment for the OGE Form 201 Automated Submission and Response System.

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?**

The individual system records are covered by existing NARA approved disposition authorities, however a records disposition authority for OGE.gov is currently under development for submission to the National Archives and

Records Administration (NARA).

- 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 records are managed according to their content in accordance with NARA approved disposition authorities. The disposition for OGE.gov has been suspended pending approval of a new schedule.

- 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 website is built on the same content management system (CMS) as the previous iteration of the website. The CMS allows OGE to publish information intended to be made public and provide technical and administrative controls to prevent unauthorized disclosure of nonpublic information. Information about the privacy impact of the ethics and FOIA information published on the website can be found in the Privacy Impact Assessments for the OGE Form 201 Automated Submission and Response System, the Financial Disclosure Tracking System, and the FOIA Tracking and Reporting Application.

- 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 system of records notice does the system operate? Provide number and name.**

Most of the information on the website is not Privacy Act-protected. The

information collected through the online OGE Form 201 system and the ethics records published on the website (including public financial disclosure reports, ethics pledge waivers, certificates of divestiture, and ethics agreements) are subject to the OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Records system of records notice.

Users of the Form 201 Automated Submission and Response System are presented with a Privacy Act statement. Moreover, a Privacy Act statement is published along with the contact information for the Contact OGE program, to advise the public with regard to information they may provide to OGE by mail, email, or telephone.

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

The modifications to the website do not require amendment or revision of any system of records notice.

F. ACCESS TO DATA:

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

The public has read access to the data published to the website. Authorized OGE employees have edit access to the data, through a content management system.

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.

The public has unrestricted read access to all of the information published to the website. Authorized OGE employees are granted unrestricted access to the content management system (through the AARF process described above) in order to make updates or add additional content to the website. As a technical matter, some of the pages of the website cannot be

edited through the content management system and must be edited by an OGE developer.

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

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?**

Yes, all contractors and consultants involved with the design and development of the system are required to sign a Privacy Act and Non-Disclosure Agreement, which includes Privacy Act contract clauses.

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

As discussed above, the website interfaces with OGE's Financial Disclosure Tracking System, Annual Questionnaire Application, OGE Form 201 Automated Submission and Response System, DOJ Referrals Form System, and FOIA Tracking and Reporting Application for the purpose of publishing information maintained in OGE's systems.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

All of the systems that share data with or have access to data from the website are internal OGE systems. The OGE system owner of each system, in conjunction with OGE's Chief Information Officer and Privacy Officer, is responsible for protecting the privacy rights of the public and employees affected by the interface with the website.

- 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 the
PIA for OGE.gov:**

1) System Manager

Date: 12/7/2023
Name: Zohair Baig (ZB)
Title: IT Specialist

2) System Owner

Date: 12/7/2023
Name: Tony Upson (TU)
Title: Deputy Chief Information Officer for Network Operations

3) Chief Information Officer

Date: 11/27/23
Name: Ty Cooper (TC)
Title: Chief Information & Cybersecurity Officer

4) Senior Agency Official for Privacy

Date: 12/07/23
Name: Diana Veilleux (DJV)
Title: Chief, Legal, External Affairs and Performance Branch and Senior Agency Official
for Privacy