

Office of Government Ethics
Privacy Impact Assessment for
Agency Information Management System

Program Counsel Division
July 2016

**U.S. Office of Government Ethics
Privacy Impact Assessment (PIA) for
Agency Information Management System**

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

Name of Project/System: Agency Information Management System (AIMS)
Office: Program Counsel 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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Chief Information Officer
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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).

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

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

Yes, depending on what an individual submits, AIMS contains information about individuals, which may include:

- First and last name;
- Business, home or cell telephone number; and
- Business or personal email address, mailing and home address.

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

Yes.

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

Yes. When an individual member of the public contacts the agency (initiates an interaction), this contact is logged in AIMS.

- c. Is the information about employees?**

Yes.

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

AIMS is an internal web based application that logs requests of OGE for assistance (emails, phone calls, correspondence, etc.). The information is collected to assist OGE in

allocating resources, managing individual workloads, identifying training needs, and assisting OGE employees in researching previously resolved interactions.

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;
- Legislative branch employees;
- Judicial branch employees;
- State and Local government employees; and
- Members of the public, including members of the press.

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

- Contacts initiated with OGE via phone;
- Contacts initiated with OGE via email;
- Contacts initiated with OGE via letter; and
- Responsive information provided by OGE staff.

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?

The information contained within AIMS is provided directly by individuals.

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

Generally, another agency would not provide data for use in the system. An ethics official at an agency may contact OGE with a question, and this interaction is logged by OGE staff into AIMS.

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

Generally, a state or local agency would not provide data for use in the system. A person from a state or local agency that contacts OGE for assistance and provides their contact information, will have that information recorded in the system.

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 type of information collected will depend on the type of information that the contact voluntarily provides to OGE. Whether a federal employee or the general public, the following information may be provided by an individual requesting assistance from OGE:

- First and last name;
- Business telephone number;
- Business email address;
- Home and personal cell telephone numbers; and
- Personal email address, mailing or home address.

3) Accuracy, Timeliness, Reliability, and Completeness

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

As an individual provides the data directly to OGE, OGE does not normally verify the accuracy of the information. As part of responding to a request for information or assistance, OGE will normally contact the individual to provide a response or to seek clarification, as necessary.

b. How will data be checked for completeness?

As an individual provides the data directly to OGE, OGE does not normally verify the accuracy of the information. As part of responding to a request for information or assistance, OGE will normally contact the individual to provide a response or to seek clarification, as necessary.

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

Whether the information is current depends on the source of the information and the date the information was provided. If an individual member of the public contacts OGE, OGE would not monitor changes in that individual's data. Thus, the data would only be current as of the last date of contact with the individual. In contrast, points of contact for federal executive branch ethics officials are updated in the agency profiles as new information is provided by the agency to OGE.

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

No.

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. The system is primarily designed to assist OGE in responding to inquiries related to ethics laws and regulations, and OGE policies and guidance. The data collected allows OGE to contact the individual requesting assistance from OGE, to monitor whether the request was fulfilled, and to assist OGE employees in conducting research on previously resolved interactions.

- 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. OGE does not maintain records on individuals requesting assistance beyond the interactions logged into AIMS.

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

N/A. As discussed in the response to question D.2, AIMS does not derive new data from the information collected.

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

N/A. As discussed in the response to question D.2, AIMS does not derive new data from the information collected.

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

N/A. As discussed in the response to question D.2, AIMS does not create previously unavailable data about an individual through aggregation of the information collected.

- 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?

An authorized user can sort and search various fields in the system, such as by agency or ethics topics, or, for government employees, by title or ethics official. For entries logged for inquiries by private citizens, none of the search filters are based on personally identifiable information.

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.

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.)

Members of the public may decline to provide their name, phone number, email or mailing address when contacting OGE for assistance. The contact fields within the application for contact information are not required, and will not generate a system error if no data is entered.

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?

No. As this is a newly developed application, some data in the system are not covered by existing records disposition authorities. OGE intends to submit a Request for Disposition Authority to the National Archives and Records Administration (NARA) in the near future. Until OGE obtains a disposal authority from NARA, no unique agency program records, if not duplicated elsewhere, will be deleted from the system. OGE will delete from the application any tracking data, as appropriate, that would be disposable under NARA's General Records 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?

- A system administrator will be given permission to access the “purge interactions” tab in the application. The system administrator can select a date range and all interactions within that date range will appear. The column fields that will appear are: Status, Title, Source/Contact, Initiated, and Reason for Do Not Delete. The “Assigned/Created” column will not appear; it will be replaced by the “Reason for Do Not Delete” column. This window displays the number of interactions that have been selected. Clicking the “Delete Interactions” button deletes the selected interactions and closes the modal window. Clicking “Cancel” closes the modal window.
- The procedures for how to dispose of the data at the end of the retention period are documented in the AIMS Functional Requirements Document.
- The data will be kept indefinitely until the Request for Disposition Authority to the National Archives and Records Administration is submitted.

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 provided in AIMS is self-reported information, given as part of a request for assistance. The use of the system by authorized OGE employees does not affect the privacy of the public or employees.

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.**

AIMS is not a system of records within the meaning of the Privacy Act of 1974, as amended.

- 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?**

Authorized OGE employees will have access to the data in the application, including:

- Users;
- Managers; and
- System Administrators.

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

Only those authorized by OGE to access AIMS will be able to access its data. Authorization is dependent upon the position and duties, and requires supervisor approval.

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

There are no access restrictions on authorized users. Access restrictions would undermine the ability to use AIMS a research tool of resolved requests, which is one of the functions of AIMS.

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

Because AIMS does not contain information that is restricted to only certain authorized users, the issue of unauthorized browsing is not applicable. Nevertheless, all interaction updates are stored in the database; this effectively is an interaction audit trail.

The history is saved in a granular way. This means that every field that has been updated has an entry in the database with the following information:

- The user that carried out the update;
- The modified date of the update;
- The initiated date/post date of the update where relevant;
- The field that was updated; and
- The previous value for that field prior to its update. This enables OGE to see the values as they have changed.

There will also be an audit trail for “Purge Interactions.” However, this will not be visible through the actual application. The information will be tracked in the database and will be manually accessed through a table. There is no audit trail for any other areas of the application, including agencies.

- 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 are not involved in the maintenance of the system.

- 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. The privacy of the public is not implicated with this system.

- 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 this Document

1) System Manager

Nicole Stein (Signature) 7-21-16 (Date)

Name: Nicole Stein
Title: Chief, Agency Assistance Branch

2) System Owner

Shelley Finlayson (Signature) 7-25-16 (Date)

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3) Chief Information Officer

Ty Cooper (Signature) 07-21-16 (Date)

Name: Ty Cooper
Title: Chief Information Officer

4) Senior Agency Privacy Officer

Diana Veilleux (Signature) 7/21/16 (Date)

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