Office of Government Ethics

Privacy Impact Assessment for Speakers Information Form (OGE Form 207)

September 12, 2007

Office of International Assistance & Governance Initiatives

U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment

Once the Privacy Impact Assessment (PIA) is completed and the signature approval page is signed, please provide copies of the PIA to the Office of Government Ethics (OGE) Chief Information Security Officer and Privacy Officer.

Name of Project/System: U.S. Office of Government Ethics Speaker Information Form (OGE Form 207)

Office: U.S. Office of Government Ethics (OGE), Office of International Assistance and Governance Initiatives (OIAGI)

A. CONTACT INFORMATION:

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

Barbara Mullen-Roth
Associate Director, OIAGI
U.S. Office of Government Ethics
Telephone: 202-482-9233

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

U.S. Office of Government Ethics
Office of International Assistance and Governance Initiatives (OIAGI)
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3917

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

Barbara Mullen-Roth
Associate Director, OIAGI
U.S. Office of Government Ethics
Telephone: 202-482-9233

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

Ty Cooper
Chief Information Security Officer (CISO)
Information Resources Management Division
U.S. Office of Government Ethics
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5) Who is the Privacy Officer who reviewed this document? (Name, organization, and contact information).

Elaine Newton
Privacy Officer
Office of General Counsel & Legal Policy
U.S. Office of Government Ethics
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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).

Daniel Dunning
Chief Information Officer
U.S. Office of Government Ethics
Telephone: 202-482-9203
Email: ddunning@oge.gov

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes

a. Is this information identifiable to the individual?

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

Yes

b. Is the information about individual members of the public?
(If YES, a PIA must be submitted with the IT Security C&A documentation).

Yes, sometimes.

c. Is the information about employees? (If yes and there is no information about members of the public, the PIA is required for the OGE IT Security C&A process).

Yes.

2) What is the purpose of the system/application? (What will be the primary uses of the system/application? How will this support the program's mission?)

The system collects information about OGE staff members who participate in speaking engagements. The system is primarily used in developing the OGE annual performance report to Congress.

3) What legal authority authorizes the purchase or development of this system/application? (What are the statutory provisions or Executive Orders that authorize the maintenance of the information to meet an official program mission or goal?)

The system is a management tool under the authority of the OGE Director.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system? (E.g., employees, contractors, volunteers, etc.)

OGE employees and points of contact for the event that is being reported on the OGE Form 207

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

OGE employees receive the information via telephone or e-mail from the requesting party. The relevant information is input into the OGE Form 207 by the OGE employee.

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?

OGE employees relay what information they receive from the requester

b. What Federal agencies are providing data for use in the system?

Any Federal agencies may request an OGE speaker

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

Any state or local agency may request an OGE speaker.

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

Any private sector organization may request an OGE speaker.

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

The event title, sponsor, date, time and location of the event, topic to be discussed, length of presentation, type of attendees, point of contact information, including name, e-mail address and telephone number will be collected from the person or entity requesting an OGE speaker.

In addition, information on whether the request was accepted or declined, information on the OGE strategic goal that will be supported and the name of the OGE speaker will be collected.

3) Accuracy, Timeliness, Reliability, and Completeness

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

The information provided by the person or entity requesting an OGE speaker is taken at face value.

b. How will data be checked for completeness?

The forms are reviewed once they are completed and converted to a document on the OGE shared drive.

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

N/A . OGE's practice is to complete these forms after the event has occurred. The form is used as a record keeping/evaluation tool.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

Yes. Each form is converted to a word document and saved on the OGE shared drive.

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?**

No

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

N/A

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

Summaries of the information will be manually compiled at the end of each fiscal year, but will not include any personally identifiable data.

7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?** Explain.

The processes are not being consolidated.

8) **How will the data be retrieved? Does a personal identifier retrieve the data?** If yes, explain and list the identifiers that will be used to retrieve information on the individual.

The information is converted to a word document. There is no retrieval by personal identifiers.

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 on individuals will be produced. Nothing will be compiled or made public that involves personally identifiable information. Statistics will be tabulated to determine how many speaking engagements OGE participated in, in a given fiscal year. The data will be used in OGE's annual performance report.

The data will be accessible via the OGE website as part of the annual performance report.

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.)

N/A

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?

The system is operated in one site.

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?

Yes. The records are retained for five years or when no longer needed. These records are under the ED-3, Training Presentations Summaries System (NI-522-96-2).

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?

All electronic data records are deleted and the paper records are shredded when they are five years old or no longer needed for current business, whichever is sooner. The information on the destruction of these records is in the records 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?

Privacy is protected by the use of passwords to access individual computers. In addition, access to the necessary software (forms router software) is limited.

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.

None. The records are not retrievable by a personal identifier.

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

The system is not being modified.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, other)

OGE employees with access to the forms router software have access to the data.

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

This software application belongs to the OGE Office of Agency Programs (OAP). OAP determines who will be granted a user license. Currently only one person has access to the raw data in this application.

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

All data is accessible by those with forms router user licenses. Other OGE employees have access to the OGE shared drive.

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

Only one person has access to the raw data in this application. The raw data is password protected.

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

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?**

The system owner is responsible for assuring proper use of the data.

See Attached Approval Page

The Following Officials Have Approved this Document

1) **System Manager**

_____ (Signature) _____(Date)

Name

Title

2) **Chief Information Security Officer**

_____ (Signature) _____(Date)

Name

Title

3) **Privacy Officer**

_____ (Signature) _____(Date)

Name

Title

4) **Reviewing Official**

_____ (Signature) _____(Date)

Name

Title