Challenge.gov Protects Citizens' Personal Information.

Challenge.gov provides all agencies with an easy way to launch and publicize challenges while effectively safeguarding the personal information of users and complying with current privacy laws and policies.

The policy framework that guides Challenge.gov's privacy strategy is OMB Memorandum 10-23, *Guidance for Agency Use of Third-Party Websites and Applications*. The guidance emphasizes that agencies operating third-party services should rigorously assess the service's privacy practices, and point users to the underlying service's privacy policy. In using Challenge.gov, your agency meets both of these standards by operating, respectively, under our global Privacy Impact Assessment and Privacy Statement.

Challenge.gov is classified as a a third-party service for privacy purposes, since the PII submitted during registration is collected and maintained by ChallengePost and is *not* available to the U.S. Government. Therefore, Challenge.gov is **not** a privacy act system of record, and does not require a System of Records Notice (SORN). This fact is made transparent to all Challenge.gov users by:

- Placing the ChallengePost logo on the site's "Log In/Sign Up" button;

- Placing the ChallengePost logo at the top of the site's registration form;

- Including on the registration form the prompt, "Log in securely to Challenge.gov with your ChallengePost account"; and

- Clearly stating this fact in the site's global privacy statement and the associated Privacy Impact Assessment.

The one instance in which Challenge.gov solicits personally-identifiable information, or PII, is during the registration process. The site asks users to submit their first and last name and e-mail address, along with a username and optional "location" (actually an unverified free-form text field).

Challenge.gov makes use of persistent cookies for customization and measurement purposes. These cookies do *not* collect any PII and are therefore Tier 2 under the classification scheme contained in OMB Memorandum 10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*. The use of persistent cookies on the site, and instructions for opting out of them if desired, are spelled out clearly in the site's privacy policy.

Some individual agency contests may require agencies to solicit PII from winning entrants in order to award prizes. This is *not* covered under Challenge.gov's overarching PIA, but agencies should check with Financial or Privacy officials to see if another pre-existing PIA covers the collection of PII for the purpose of making payments to individuals.

Challenge.gov also seeks to protect children's privacy, in accordance with the Children's Online Privacy Protection Act of 1998, or COPPA. The site is not aimed at and does not knowingly accept registrations from children under the age of 13, and includes an age filtering mechanism at registration. Contests aimed at children under age 13 must have a parent or guardian submit entries on their child's behalf. The Challenge.gov privacy statement provides clear instructions for both children and adults on how to use Challenge.gov responsibly.

FACTS AT A GLANCE

- Your agency can use Challenge.gov without completing a PIA and Privacy Policy; GSA has already completed one that extends to all agencies' use of the platform.

- Challenge.gov uses an authentication system operated by ChallengePost. This fact is made transparent to users of the site in several different ways.

- PII collected at registration is not available to the U.S. Government, and therefore Challenge.gov is *not* a Privacy Act System of Record and does not require a SORN.

- Challenge.gov uses persistent cookies for customization and analytics. These do *not* collect PII, and clear opt-out instructions are contained in the site's Privacy Policy.

- You may need to collect additional PII to award the prize for a challenge. That is not covered by the standard PIA for Challenge.gov. However, your agency may already have an existing PIA that covers it.

Additional questions? E-mail us!
challenge@gsa.gov