

Office of Government Ethics

Privacy Impact Assessment for Online Course Registration Application

January 2018
Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for
Online Course Registration Application**

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

Name of Project/System: Online Course Registration Application (OCRA)

Office: Program Counsel Division

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Jennifer Matis
Associate Counsel
jmatis@oge.gov
(202) 482-9216

2) Who is the system owner?

Shelley K. Finlayson
Chief of Staff and Program Counsel
skfinlay@oge.gov
(202) 482-9314

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

Patrick Shepherd
Lead Instructor
patrick.shepherd@oge.gov
(202) 482-9206

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

Ty Cooper
Chief Information Officer
itcooper@oge.gov
(202) 482-9226

5) Who is the Privacy Officer who reviewed this document?

Diana J. Veilleux
Senior Agency Official for Privacy
Chief, Legal, External Affairs and Performance Branch

Diana.veilleux@oge.gov
(202) 482-9203

6) Who is the Reviewing Official?

Ty Cooper
Chief Information Officer
jtcooper@oge.gov
(202) 482-9226

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes, it contains email addresses of federal employees.

a. Is this information identifiable to the individual?

Yes.

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

Yes.

c. Is the information about employees?

Yes, the information is submitted by federal employees who wish to register to participate in OGE's online training courses. The registration page indicates that the application is for government employees only and states that registrants should use their official government email addresses to register.

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

OCRA enables agency ethics officials to register for OGE's online training courses. OGE's instructors use the information to send registrants course reminders, information regarding the course, and request feedback on the registrants' experience of the course. It also allows OGE to maintain statistical data on course registrations.

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

The Ethics in Government Act of 1978, as amended, authorizes the Director of OGE to provide overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive agency. See 5 U.S.C. app. § 402. OGE's responsibilities include supporting agency ethics officials

through such training, advice, and counseling as the Director of OGE deems necessary. See 5 C.F.R. § 2638.108(a)(5). The system supports those functions.

C. DATA in the SYSTEM:

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

Current executive branch employees.

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

The employees enter their email addresses into the system if they choose to register for an online training course. The registration page instructs them to use their official government email address.

- 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?**

Directly from the source.

- 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?**

N/A.

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

Email address only.

3) Accuracy, Timeliness, Reliability, and Completeness

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

N/A.

- b. How will data be checked for completeness?**

The system validates that the data provided meets the standard format of an email address. An OGE instructor will review the data submitted for each course to check for self-evident issues with completeness or accuracy.

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

N/A. The data is intended for one-time use with regard to a particular online training course; once the course is complete the data is maintained for historical purposes only.

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

N/A.

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?**

N/A.

- 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?**

N/A.

- 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?**

Data will be retrieved by course identifier. An instructor will run a query for a particular course and all data related to that course will be retrieved. Data will not be retrieved by personal identifier.

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

N/A. Reports cannot 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)?**

Participation is voluntary. Individuals may decline to enter an email address into the system. Moreover, individuals can access videos of the online classes in OGE's video archives without registering for the course.

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 specific disposition authority for OGE's training registration records is currently pending. The retention period is three years.

- 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?**

Timely destruction of federal records is the responsibility of the Records Officer. The reports are temporary and will be destroyed when they are no longer needed by the agency.

- 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 use of this technology only impacts executive branch employees who choose to use OGE's online registration system. Moreover, users are instructed to provide official government email addresses only. Accordingly, the data in the system is not of a highly personal nature and the system will not have a substantial impact on the privacy interests of the executive branch employees who choose to utilize the system.

- 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. The information is not kept in a Privacy Act system of records.

- 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 Instructors, Managers, and System Administrators.

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

Access to all OGE applications is controlled and documented by OGE's Internal Operations Division.

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

Only authorized System Administrators will have access to all of the data in the system.

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

N/A.

- 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 were involved with the design and development 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.

- 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.

See Attached Approval Page

The Following Officials Have Approved this Document

1) System Manager

 (Signature) 1-19-18 (Date)

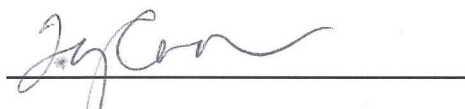
Name: Patrick Shepherd
Title: Lead Instructor

2) System Owner

 (Signature) 1/29/18 (Date)


Name: Shelley Finlayson
Title: Chief of Staff and Program Counsel

3) Chief Information Officer

 (Signature) 01/19/2018 (Date)

Name: Ty Cooper
Title: Chief Information Officer

4) Senior Agency Privacy Officer

 (Signature) 01/20/18 ^{DN} (Date)

Name: Diana Veilleux
Title: Chief, Legal, External Affairs and Performance Branch