

# **Office of Government Ethics**

## **Exit Clearance Survey SurveyMonkey Form Privacy Impact Assessment**

December 2023  
**Compliance Division**

**U.S. Office of Government Ethics (OGE)  
Privacy Impact Assessment (PIA) for Exit Clearance Survey  
via SurveyMonkey**

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

**Name of Project/System:** Ethics Clearance Survey via SurveyMonkey

**Office:** Compliance Division

**Executive Summary**

SurveyMonkey is a third-party website and application that enables the agency to create customized surveys. Once a user creates a SurveyMonkey account, the user has access to over 100 survey templates and over 2,500 questions. Users may also create custom templates and questions. SurveyMonkey allows users to send surveys via the internet and email. OGE has a [PIA for Survey Monkey](#) that generally covers instances in which the agency may utilize SurveyMonkey to collect and retain personally identifiable information (PII), including a survey taker's name, address, email address, internet protocol (IP) address, and other information that enables the agency and/or SurveyMonkey to identify respondents. SurveyMonkey's Terms of Service and Privacy Policy govern its collection, use, maintenance, and disclosure of information. Users are advised to review the SurveyMonkey [Privacy Policy](#) before using its services to understand how and when SurveyMonkey collects, uses, and shares the information submitted for OGE surveys using SurveyMonkey's services.

This PIA specifically covers the collection of data requested from separating employees regarding the reasons for their departures from OGE, including demographic information, which will enable OGE to identify areas in which improvements may be needed.<sup>1</sup> OGE's general SurveyMonkey PIA also applies to the use of SurveyMonkey to collect this information and should be reviewed before implementing an Exit Clearance Survey.

**A. CONTACT INFORMATION:**

**1) Who is the person completing this document?**

Kaneisha Cunningham  
Senior Administrative Officer  
Compliance Division, Administrative Operations Branch  
ktcunnin@oge.gov  
202-482-9228

**2) Who is the system owner?**

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<sup>1</sup> Although this PIA is not required by the E-Government Act of 2002, the OGE Privacy Team determined that a discretionary PIA is warranted for this survey.

Dale Christopher  
Deputy Director for Compliance Division  
dachrist@oge.gov  
202-482-9224

**3) Who is the system manager?**

Kaneisha Cunningham  
Senior Administrative Officer  
Compliance Division, Administrative Operations Branch  
kccunnin@oge.gov  
202-482-9228

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

Ty Cooper  
Chief Information & Cybersecurity Officer  
[jtcooper@oge.gov](mailto:jtcooper@oge.gov)  
(202) 482-9226

**5) Who is the Senior Agency Official for Privacy who reviewed this document?**

Diana J. Veilleux  
Senior Agency Official for Privacy  
Chief, Legal, External Affairs and Performance Branch  
[Diana.veilleux@oge.gov](mailto:Diana.veilleux@oge.gov)  
202-482-9203

**6) Who is the Reviewing Official?**

Ty Cooper  
Chief Information & Cybersecurity Officer  
[jtcooper@oge.gov](mailto:jtcooper@oge.gov)  
202-482-9226

**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

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

Yes.

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

Yes.

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

No, this survey will only be completed by current OGE employees before their separation date.

**c. Is the information about employees?**

Yes.

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

OGE is using SurveyMonkey to collect information from separating employees about the reasons they are leaving OGE, which will enable OGE to identify areas in which improvements may be needed in Human Resources or management practices.

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

5 U.S.C. 3101 and chapter 131, Executive Orders 13988 and 14035.

**C. DATA in the SYSTEM:**

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

Current OGE employees.

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

**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?**

Information is collected from the employees themselves.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

No information will be collected from the public. Information collected from employees will include personally identifiable information (PII) such as name, title, branch, gender, pay grade, length of service at OGE, and underserved community status.

**3) Accuracy, Timeliness, Reliability, and Completeness**

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

Respondent employees are responsible for providing accurate information.

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

The Administrative Officer will verify that the separating employee completes the survey during the exit clearance process.

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

Not applicable. The data is intended to be current when collected only.

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

No, however, the data elements are simple and self-explanatory.

**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?**

The data will not be kept in the employee's personnel record and is solely for the review of the Administrative Officer and OGE managers to determine if improvements in Human Resource/management practices are warranted.

**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?**

Not applicable.

**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?**

Survey results will be retrieved by personal identifier, typically the departing employee's name.

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

The Administrative Officer (AO) will review the data and notify management if any of the information collected should be reviewed and acted upon. If so, the AO will retrieve data and reports from SurveyMonkey for management review.

**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)?**

Completing the survey is mandatory and part of the exit clearance process. Respondents have no opportunity to consent to particular uses.

**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?**

Not applicable.

- 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 information is covered by National Archives and Records Administration (NARA) disposition authority DAA-GRS-2014-0004-0001. The retention period is Temporary. Destroy when no longer required for business use.

- 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 OGE Records Officer. The reports are temporary and will be destroyed when no longer needed for business purposes, in accordance with NARA disposition authority DAA-GRS-2014-0004-0001. OGE's records management policies document the procedures for disposition of Federal records.

- 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?**

OGE designed the survey to collect only necessary information, and it properly secures the information. SurveyMonkey has security protections in place to protect the privacy of its users. See <https://www.surveymonkey.com/mp/legal/security/>. To the extent that the collected data is maintained on OGE's network, the agency will take appropriate steps to mitigate any potential threats to privacy.

- 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?**

Not applicable.

**8) What controls will be used to prevent unauthorized monitoring?**

SurveyMonkey does not have the capability to monitor individuals.

**9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

OGE/INT-8, Employee Personnel Files Not Covered by Other Notices. The survey will display a Privacy Act statement.

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

No.

**F. ACCESS TO DATA:**

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

Only four OGE users have direct administrative access to SurveyMonkey, one of whom will provide the survey results to the Administrative Officer. Only the Administrative Officer, the Deputy Director for Compliance, and the HR Attorney-Advisor will have access to the data that is imported into OGE's network through this survey.

**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, their supervisor, and the Chief Information & Cybersecurity 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.**

Only individuals with access to the OGE SurveyMonkey account will have access to the data. They will have access to all of the data in the application.

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

Authorized users have been advised that agency policy prohibits them from unauthorized browsing of data, and they have been instructed not to engage in such activities.

**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?**

Not applicable.

**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?**

Not applicable.

**10) Who is responsible for assuring proper use of the data?**

The Administrative Officer is responsible for assuring proper use of the data collected.

**The Following Officials Have Approved the PIA for the SurveyMonkey Exit Clearance Survey:**

**1) System Manager/Owner**

Initials: (DC)

Date: December 4, 2023

Name: Dale Christopher

Title: Deputy Director, Compliance Division

**2) Chief Information & Cybersecurity Officer**

Initials: (TC)

Date: November 17, 2023

Name: Ty Cooper

Title: Chief Information & Cybersecurity Officer

**3) Senior Agency Official for Privacy**

Initials: *DV*

Date: December 4, 2023

Name: Diana Veilleux

Title: Chief, Legal, External Affairs and Performance Branch and Senior Agency Official for Privacy