

Office of Government Ethics

Privacy Impact Assessment for the Electronic Email Records Capture Application

September 2024
Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
Email Records Capture Management Engine (ERCME)**

Name of Project/System: Email Records Capture Management Engine (ERCME)

Office: Program Counsel Division

The Email Records Capture Management Engine (ERCME) is the official email repository for OGE's Capstone Officials and other OGE employees to save administrative, program, and calendar records requiring long-term or permanent preservation. The application fulfills requirements of the National Archived and Records Administration to retain email and calendar records and supports OGE's mission by allowing users to efficiently collect, store, use, and maintain email and calendar records throughout their lifecycle.

A. CONTACT INFORMATION:

Who is the person completing this document?

Donna Williams
Records Officer
Legal, External Affairs & Performance Branch
DWilliam@oge.gov
(202) 482-9242

Who is the system owner?

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

Who is the system manager for this system or application?

Donna Williams
Records Officer
Legal, External Affairs & Performance Branch
DWilliam@oge.gov
(202) 482-9242

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

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

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
(202) 482-9203

Who is the Reviewing Official?

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

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

The application contains emails to and from OGE officials concerning OGE work activities, as well as calendar entries.

a. Is this information identifiable to the individual?

See below.

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

Emails and calendars saved in the application include sender and recipient email addresses and names. Some information contained in the body of emails could include information about members of the public. It is expected that this would be rare.

c. Is the information about employees?

Emails and calendars saved in the application include sender and recipient email addresses and names, which includes OGE employees' names and government email addresses. Some information contained in

the body of emails could include information about OGE employees, most frequently employee job titles, work addresses, and telephone numbers.

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

The purpose of the application is to provide a way for OGE employees and leadership to efficiently capture and save official emails and calendars. The application was created to meet NARA requirements for an electronic recordkeeping repository to manage email and calendar records requiring long-term (non-Capstone) and permanent (Capstone) preservation.

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

36 CFR Part 1236 -- Electronic Records Management.

C. DATA in the SYSTEM:

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

Under OGE's approved policy, the application covers the email and calendar accounts of all OGE staff and contractors working for or on behalf of OGE who create, receive, collect, process, use, and store agency records.

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

Information in the application is captured from the Outlook accounts and calendars of OGE employees and leadership officials.

3) 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 in the application is captured from the Outlook accounts and calendars of OGE employees and leadership officials.

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

N/A

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

N/A.

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

N/A.

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

N/A.

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?**

Information in the application consists of emails and calendars provided by OGE employees and officials. Such individuals or their designees are responsible for the completeness of records they save in the application.

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

None. Emails and calendars are saved to the application as a historical record of OGE activities.

- 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.

- 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?**

No.

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 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?

Yes. Data is retrieved by fields such as the name, email address, and job title of the sender/recipient, as well as by other fields.

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. The application does not have a reporting function, but searches can be exported.

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)?

Individuals do not have any opportunity to decline or refuse to provide information or to consent to uses of the information.

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 data in the application is covered under the OGE Records Disposition schedule for Capstone disposition authorities. This covers both Capstone officials and other OGE employees who save records in the application. The retention period for the data is permanent (Capstone officials) and seven years (all other OGE employees)

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?

The OGE Records Officer will ensure that temporary records are destroyed and that permanent records are timely transferred to NARA, in accordance with NARA-approved records disposition schedules. The ERCME application does not produce any reports.

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 ERCME application is accessible by OGE employees only and access is controlled. Generally, OGE employees may only access records they save in ERCME. Only OGE employees who require access to these records to perform their job duties, such as employees involved in records management, IT, or OGE's FOIA program, are allowed full access. Although email records are maintained in ERCME for a longer period of time than they would otherwise be kept, this is required to meet OGE's records management obligations. Therefore, the use of this technology does not have any greater impact on public/employee privacy than necessary.

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.

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 who require access to the data in the application to perform their job duties, for example, in records management, IT, or FOIA. Other OGE employees have access to records they put into the application.

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 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.

See above.

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

Users cannot access records that they are not authorized to access, thus preventing unauthorized browsing. In addition, authorized users have been advised that agency policy prohibits them from unauthorized browsing of data and 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 contractors were involved with the design, development, or maintenance of the application.

6) Do other systems share data or have access to the data in the system? If yes, explain.

The application interfaces with OGE's Outlook system, from which emails and calendars are saved.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

The system owner, in conjunction with the CIO, is responsible for protecting the privacy rights of the public and employees affected by the interface

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 the
PIA for the Electronic Email Records Capture Application:**

1) System Manager

**Name: Donna Williams
Title: Records Officer**

2) System Owner

**Name: Shelley Finlayson
Title: Chief of Staff & Program Counsel**

3) Chief Information Officer

**Name: Ty Cooper
Title: Chief Information & Cybersecurity Officer**

4) Senior Agency Official for Privacy

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