

Office of Government Ethics

Privacy Impact Assessment for the ITA Events Electronic Database

September 2022
Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
ITA Events Electronic Database**

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

Name of Project/System: ITA Events Electronic Database
Office: Program Counsel Division

A. CONTACT INFORMATION:

1) Who is the person completing this document?

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2) Who is the system owner?

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes. The electronic database, created in-house by OGE IT staff, contains aggregate information on country visitors to OGE who attend international briefings provided by OGE employees. Information inputted into the database is determined by category of the visitor's employment and activity. OGE maintains other information on visitors, including their biographies and employers, but this information is not included in the electronic database. The electronic database also includes information about Government employees' activities with regard to OGE's International Outreach and Assistance program, and it includes contact information for individuals engaged by National Program Agencies and other non-Federal entities that host, facilitate, or provide OGE funding for international delegations.¹

a. Is this information identifiable to the individual?

Some of the information is identifiable to the individual and some is in the aggregate.

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

Yes. Certain information pertains to members of the public.

¹ OGE has determined that the activities of this program are not subject to the European Union's General Data Protection Regulation (GDPR). The GDPR only applies to organizations outside of the EU if the organization either (1) offers goods or services to individuals or businesses in the EU or (2) monitors the behavior of subjects within the EU. OGE does neither. OGE does not offer its assistance directly to the international community; rather it responds to requests from the U.S. Department of State or U.S.-based nongovernmental organizations.

c. Is the information about employees?

Yes. Certain information pertains to individual OGE employees.

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

The database allows OGE to track information regarding presentations provided to international audiences. This allows OGE to track the briefings, provide aggregated and individualized internal data for performance and budgeting, and provide external reports to the State Department.

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

The system was developed by OGE to support the work of OGE's International Outreach and Assistance Team (International Team). The Ethics in Government Act of 1978, as amended, authorizes the Director to provide overall direction of executive branch policies related to preventing conflicts of interest. See 5 U.S.C. app. §§ 401-402. Under this authority, OGE has undertaken multi- and bi-lateral educational activities aimed at raising awareness of U.S. executive branch ethics activities. These activities are also encouraged by and support the work of the State Department under the International Visitors Leadership Program, the Mutual Education and Cultural Exchange Act (22 U.S.C. 2452), the Foreign Assistance Act, the International Anti-Corruption and Good Governance Act of 2000 (22 U.S.C. 2152c), and other relevant acts and treaties, including Chapter IV of the United Nations Convention Against Corruption and Art. XIV(2) of the Inter-American Convention Against Corruption.

C. DATA in the SYSTEM:

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

International visitors, employees and representatives of National Program Agencies and organizations that host international delegations, federal employees, employees of entities who provide OGE with funding for international delegations.

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

Biographical information for international visitors is provided by non-Federal hosting entities. They may include universities, federal agencies, and the National Program Agencies (NPAs) that administer the International Visitor Leadership Program. NPA entities are private nonprofits operating in public-private partnership with the State Department and include the Meridian Center, FHI 360, the Institute for International Education, and World Learning. OGE also receives information from other entities such as the Defense Institute of International Legal Studies and universities who host OGE speakers for international-related events. Note that personally-identifiable biographical information is not entered into the application.

Funding information and employee information is received from employees who are assigned to host the presentation and the International Team in the course of preparing the delegation. Funding information is derived from discussions with non-Federal sources and actual funding acceptance by OGE.

- 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?**

With regard to biographical information about country visitors, the information is obtained from a third party and is not provided directly by the individual visitor. With regard to funding information, the information is provided by the individual hosting the presentation, usually a member of the International Team.

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

The State Department and other entities, such as the Defense Department, which may host or facilitate briefings.

- 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?**

See above.

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

Non-personally identifiable data is required to be collected to provide State Department reports about funding sources and participant summaries. This non-personally identifiable data (which includes the number of visitors, their employment and professional activity category) is generally provided through biographies received from third parties and collected and compiled by the International Team. Funding data from employees is necessary to complete OGE Form 1353, non-Federal Travel Expenses reports, and to ensure compliance with appropriations laws and the Anti-Deficiency Act.

3) Accuracy, Timeliness, Reliability, and Completeness

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

OGE does not verify the accuracy of the biographies that are received. Funding information is verified against receipts and/or the OGE Form 1353.

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

Members of the International Team review biographical information at the time it is accepted to determine whether it contains the information necessary to meet OGE's reporting requirements.

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

The data is current as of the date it is collected. It is intended to be historical data as of the date of the event only and not remain current once the event has passed.

- 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. Only non-personally identifiable information is aggregated, for purposes of reporting.

- 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. The aggregated information is not personally identifiable.

8) How will the data be retrieved? Does a personal identifier retrieve the data?

Data is retrieved by event classifications, fiscal year, whether there was funding, the country involved in delegation, and visitors by employment and field of activity.

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

OGE does not produce reports on individuals with information collected from the ITA events database.

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 to provide the information or to consent to particular uses of the information. The information is necessary for the purposes outlined above and therefore, providing the information is mandatory and the uses are required. NPAs and other non-Federal entities may choose to limit the information to the non-personally identifiable information required for State Department reporting.

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?**

Yes, per National Archives and Records Administration (NARA) disposition authority DAA-0522-2019-0007-003. The retention period is as follows: Cut-off at end of calendar year. Destroy 6 year(s) after cut-off.

- 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 in accordance with OGE NARA-approved records disposition schedules.

- 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 the application has only a de minimis impact on public and/or employee privacy. The personally identifiable information in the application is nonsensitive and available through other sources, such as the OGE Form 1353. The biographical information maintained in the application is not personally identifiable. Even if individuals could be re-identified by combining the aggregated data with outside data sources, that information is nonsensitive biographical information of the type that is generally made public.

- 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?

The information cannot be used for purposes of monitoring.

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 (SORN) require amendment or revision? Explain.

N/A. The records in the ITA database are not subject to the Privacy Act.

F. ACCESS TO DATA:

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

All OGE employees have access to the information.

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

Access to the OGE network and 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, his/her supervisor, and the Chief Information & Cybersecurity Officer before a request is approved to be implemented by ITD staff. AARF requests may be ongoing in nature, as with supervisors who have access to contact information about their employees, or temporarily granted for a specific, limited purpose. Only employees with access to OGE's network can access the information in this database.

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

Authorized OGE network users have access to all information in the system.

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

The personally identifiable data in the application is nonsensitive and generally available to all OGE employees and contractors through other authorized means. Therefore, there is no potential for unauthorized browsing.

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 system.

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

No other systems share data or have access to the data in the system.

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. OGE prepares reports for the State Department (which do not contain personally identifiable information) from the database.

9) How will the data be used by the other agency?

State Department aggregates non-personally identifiable information for purposes of Congressional reporting.

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 the PIA for the ITA Events Electronic Database:

1) System Manager

Initials: *EH*

Date: September 8, 2022

Name: Elizabeth Horton
Title: International Team Lead
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2) System Owner

Initials: *DV*

Date: September 8, 2022

Name: Diana Veilleux
Title: Chief
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3) Chief Information Officer

Initials: *TC*

Date: 9/2/2022

Name: Ty Cooper
Title: Chief Information & Cybersecurity Officer
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4) Senior Agency Official for Privacy

Initials: (see above)

Date:

Name: Diana Veilleux
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