Office of Government Ethics

Accelerated Curriculum in Ethics SurveyMonkey Application Form
Privacy Impact Assessment

May 2023
Program Counsel Division

U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for Accelerated Curriculum in Ethics SurveyMonkey Application Form

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

Name of Project/System: Accelerated Curriculum in Ethics SurveyMonkey Application Form
Office: Program Counsel 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 conducted this PIA because 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. It is suggested that users 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.

It is intended that this PIA will cover the collection of data necessary to conduct the admissions process for the ACE program. This will allow OGE to collect resumes and letters of recommendation from applicants, and to gather contact information and data about applicants' fluency with ethics program areas and practices.

A. CONTACT INFORMATION:

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

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

   Nicole Stein
   Chief, Agency Assistance Branch
   Program Counsel Division

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

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

Ty Cooper
Chief Information & Cybersecurity Officer
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5) **Who is the Senior Agency Official for Privacy who reviewed this document?**

Diana J. Veilleux
Senior Agency Official for Privacy
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6) **Who is the Reviewing Official?**

Ty Cooper
Chief Information & Cybersecurity Officer
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B. **SYSTEM APPLICATION/GENERAL INFORMATION:**

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

Yes. Applications submitted through this SurveyMonkey form will contain information about individuals who are executive branch employees. It will include work contact information, resumes, letters of recommendation, and information about the applicants' fluency in various areas of government ethic work.

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

Yes.

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

No, ACE program is currently only open to current federal employees.

c.   Is the information about employees?

Yes.

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

SurveyMonkey is a third-party website and application that enables the agency to create customized surveys and forms. The ACE program is using SurveyMonkey to collect information from applicants to the program including, resumes, letters of recommendation, contact information, and indicia of fluency in various aspects of ethics work. This information will be used to select participants for the program.

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

The ACE program is conducted under OGE's organic authority to provide the executive branch with information about ethics law and policy, at Ethics in Government Act section 402(b)(14).

C. DATA in the SYSTEM:

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

Current executive branch employees, potentially including OGE employees.

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

Information is collected from the applicants themselves.

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?

See above.

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?

Information collected from applicants will contain personally identifiable information (PII), including name, address, email address, resume, letter of recommendation from applicants' supervisors or other official superior, and self-assessment data about applicants' fluency with various aspects of ethics work.

OGE users must select the option to not collect IP addresses.

3) Accuracy, Timeliness, Reliability, and Completeness

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

Applicants are responsible for providing accurate information.

b.   How will data be checked for completeness?

OGE instructors will review applications for completeness.

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 and then will be used for historical purposes 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?**

   Not applicable.

4) **Can the system make determinations about employees/the public that would not be possible without the new data?**

   Not applicable.

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?**

   Applications will be retrieved by personal identifier, typically applicant's name, as well as by other information such as agency 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?**

   There will be no reports. The applicant's completed application packet, which includes the application data, resume, and letter of recommendation, will be downloaded

to the OGE network. These will be accessed only by ACE facilitators/instructors in order to make decisions about admission to the ACE program.

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)?**

Application to the ACE program is entirely voluntary. All requested information must be provided for an applicant to be considered for acceptance to the program. There is no opportunity to consent to particular uses of the information. A Privacy Act statement will be included on the survey.

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?**

OGE's records officer has been consulted about the ACE application using Survey Monkey, and has advised that applications received through the system should be managed and disposed under GRS 2.6: Employee Training Records. Records collected through the application should be retained for three years after they are no longer needed or obsolete, but may be kept longer if a business need persists. The disposition authority is DAA-GRS-2016-0014-0001.

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?**

See above.

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 application form created using SurveyMonkey collects no more information than is necessary and 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. OGE has designed the application form to collect only that information necessary to make a decision about admitting an applicant.

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.**

The ACE training and performance information is collected and maintained pursuant to OPM/GOVT-2, Employee Performance File System Records. 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 a limited number of OGE users have direct administrative access to SurveyMonkey and to information collected through the ACE survey. Only authorized OGE users will have access to the data that is imported into OGE's network through this survey. Generally, the information collected will be limited to non-sensitive PII, such as contact information, work history, and educational background.

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, his/her 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.**

    Reviewing instructors/facilitators will have access to all data on the system.

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 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?

Each authorized user is responsible for assuring proper use of the data collected.

The Following Officials Have Approved the PIA for SurveyMonkey:

1) **System Manager/Owner**

   Electronic
   Signature:

   Name: Nicole Stein
   Title: Chief, Agency Assistance Branch

2) **Chief Information & Cybersecurity Officer**

   Electronic
   Signature:

   Name: Ty Cooper
   Title: Chief Information & Cybersecurity Officer

3) **Senior Agency Official for Privacy**

   Electronic
   Signature:

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