

**Office of Government Ethics**  
**Privacy Impact Assessment for the**  
**Use of Third-Party Websites and Applications**

**November 2023**  
**Program Counsel Division**

**U.S. Office of Government Ethics  
Privacy Impact Assessment (PIA) for the  
Use of Third-Party Websites and Applications**

**Name of Project/System:** OGE’s Use of Social Media and Other Accounts on Third-Party Websites and Applications

**Office:** Program Counsel Division

**Executive Summary**

This PIA covers OGE’s general practices regarding the official use of third-party websites and applications. OGE maintains accounts on third-party website and applications (third-party accounts) for a variety of purposes. For example, social media accounts on third-party websites provide an additional avenue for OGE to inform, educate, and engage its external audiences. The third-party accounts covered by this PIA include: Google Analytics, search.gov, Lexis-Nexus, Monsido, YouTube, Caseguard, Instagram, LinkedIn, and Twitter. Any OGE third-party accounts that do not involve the collection of PII must comply with this PIA, whether or not they are specifically named in this document.

When OGE’s use of a third-party accounts involves the collection of personally identifiable information (PII), a separate PIA specific to that website or application is required. Currently, OGE has several PIAs specific to particular third-party websites and applications, including Box, SurveyMonkey, and WebEx. When OGE’s use of a third-party account is covered by a PIA specific to that use, that PIA supersedes this one.

If an OGE branch or division wishes to create a new third-party account involving the collection of PII, or change the use of an existing account to involve the collection of PII, a privacy threshold analysis (PTA) must be submitted and approved before proceeding. All employees must also comply with OGE’s Policy for the Creation and Use of Official OGE Social Media Accounts, as well as OGE’s specific policies and procedures for use of LinkedIn, Twitter, and YouTube.

**A. CONTACT INFORMATION:**

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

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

No. While social media sites often contain information about individuals, OGE will not request, collect, or maintain any PII through OGE third-party accounts covered by this PIA. (As noted above, any use of third-party websites or applications that does involve the collection of PII must be addressed in a separate PIA.)

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

N/A.

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

N/A.

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

N/A.

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

OGE maintains accounts on third-party websites for a variety of purposes, such as to promote transparency, raise the visibility of the executive branch ethics program and OGE, improve the usability of OGE's website, and provide cost-effective online training for ethics officials.

OGE uses its third-party social media accounts to inform its external audiences about the executive branch ethics program and OGE, to provide ethics education and training for agency ethics officials, and to direct users to OGE's official website or to contact OGE for more information. Individual users voluntarily include PII on their profiles, such as name, username, email address, photos, images, and videos. Although OGE may use this information to respond to comments or messages posted on or directed at OGE's third-party accounts, OGE does not request, collect, maintain, or record PII through third-party accounts.

OGE uses analytic technology to monitor traffic directed to its website through OGE's third-party accounts and engagement activities with OGE third-party pages, such as the number of views, clicks on posted links, "likes" and "retweets," and the number of "followers," "friends," "subscribers," or similar connections. OGE uses this information to learn about the reach of its external communications by analyzing the number of users who visit OGE's official website through links OGE posts on its third-party sites and to make its website and third-party accounts more useful to its external audiences. Although user internet protocol (IP) addresses may be provided through the use of analytic technology, OGE doesn't use IP addresses to identify users. OGE's Google Analytics account collects and stores IP addresses by default. However, OGE does not use those IP addresses to identify or track users. OGE also uses a Google Analytics Tracking Code that places a "cookie" on the user's computer. These cookies allow OGE to analyze its web traffic. OGE does not use cookies to track information about identified users. Users may use a cookie blocker application to opt out.

**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. § 13122. Use of social media and analytics is an essential part of conducting agency business today. With regard to use of third-party accounts for training purposes, 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).

**C. DATA in the SYSTEM:**

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

Members of the public who interact with OGE’s website or third-party social media accounts may be identified through OGE’s use of those accounts. However, as noted above, no individuals are “covered” by the system in the sense of their information being collected or maintained by OGE.

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

N/A. OGE does not request, collect, or maintain PII through third-party accounts.

**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?**

N/A. When a member of the public interacts with an OGE third-party account, the user’s name, username, profile information, and the content of the messages or postings (including photos, images, videos, and other personal information provided by the user) may become available to OGE. That information is provided directly by the user.

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

None.

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

None.

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

None.

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

None. See above.

**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?**

N/A.

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

N/A.

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

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?**

N/A because OGE was not involved with the design of these applications. The use of third-party accounts is necessary to OGE's role in leading and overseeing the executive branch ethics program.

**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?**

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?**

N/A. No data is collected, therefore it is not retrieved.

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

None.

**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), and how individuals can grant consent.)**

Use of third-party websites is voluntary. Whether individuals can decline to provide certain information or to consent to particular uses is governed by the terms of service agreement of each third-party website.

**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?**

As stated in the Policy for the Creation and Use of Official OGE Social Media Accounts, in the event that information posted, received, or connected with an OGE third-party account meets the definition of an agency record, as defined by 44 U.S.C. § 3301 and 36 C.F.R. § 1222.10, employees will adhere and conform to OGE's Records Management Policy.

Content posted to OGE third-party account profiles by other users may be retained independently by the third-party website and such retention period is governed by the terms of service agreement of each third-party website.

**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?**

There is no appreciable effect on public/employee 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?**

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?**

OGE restricts access to its third-party accounts only to employees who have received management approval to access the account to perform their official duties. Access to social media accounts is governed by the Policy for the Creation and Use of Official OGE Social Media Accounts. Access to other accounts 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.



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

See above.

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

Generally, OGE users with access to a third-party account will have access to all information available to that account.

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

N/A. Because access is restricted to a very limited number of authorized individuals, 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.

- 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?**

N/A.

**See Attached Approval Page**

**The Following Officials Have Approved this Document**

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