

Department of the Interior
Privacy Impact Assessment

June 07, 2011

Name of Project: Zoomerang
Bureau: Department of the Interior
Project's Unique ID (Exhibit 300):

CONTACT INFORMATION:

Departmental Privacy Office
Office of the Chief Information Officer
U.S. Department of the Interior
202-208-1605
DOI_Privacy@ios.doi.gov

SYSTEM APPLICATION/GENERAL INFORMATION:

Does this system contain any information about individuals *{this question is applicable to the system and any minor applications covered under this system}*?

Yes, the system may contain official employee email addresses and information provided in survey responses by employees.

- a. **Is this information identifiable to the individual¹** *{this question is applicable to the system and any minor applications covered under this system}*? (If there is NO information collected, maintained, or used that is identifiable to the individual in the system, Sections D through G can be marked not applicable. If YES complete all sections for system and any applicable minor applications).

Yes, official employee email addresses, if contained within the system, would be identifiable to individuals. However, survey responses are anonymous and are not identifiable to individuals.

- b. **Is the information about individual members of the public** *{this question is applicable to the system and any minor applications covered under this system}*? (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

No. DOI does not use Zoomerang to survey the public, so DOI's instance of the Zoomerang database will not contain information identifiable to individual members of the public.

- c. **Is the information about employees** *{this question is applicable to the system and any minor applications covered under this system}*? (If yes and there is no information about

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes, official email addresses are identifiable to individual DOI employees. However, survey responses are anonymous and are not identifiable to individual employees.

What is the purpose of the system/application?

Zoomerang is a free-to-low-cost SaaS online survey application that allows users to create, send and analyze online survey results. The Zoomerang application allows DOI to quickly and easily create an unlimited number of online surveys to collect and share feedback from DOI employees, which help decision makers understand factors that influence DOI employees, identify key issues, and improve programs and services.

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

Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, Dec. 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 USC 1401; OMB Circular A-130; 110 Departmental Manual 18, 110 Departmental Manual 5.

DATA IN THE SYSTEM:

What categories of individuals are covered in the system?

DOI employees, contractors and volunteers.

What are the sources of the information in the system?

**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?**

Surveys may be deployed by DOI through employee bulletin emails. DOI personnel may also place official employee e-mail address identifiers in the Zoomerang database in order for Zoomerang's e-mail delivery service to distribute surveys to employees. These official email addresses are obtained from official DOI sources, such as the Office of the Secretary. Employee responses are not linked to employee email addresses and are not identifiable to individual employees. Any other information in the database will come from individual employee responses to survey questions, none of which will request PII.

What Federal agencies are providing data for use in the system?

No other Federal agencies are providing data for use in Zoomerang.

What Tribal, State and local agencies are providing data for use in the system?

None.

From what other third party sources will data be collected?

None.

What information will be collected from the employee and the public?

Only survey responses will be collected from employees and none will be collected from the public. In addition to official employee email addresses which may be contained in the system, information collected from employees in survey responses include opinions that are associated with DOI programs. Survey questions do not request personally identifiable information.

Accuracy, Timeliness, and Reliability

How will data collected from sources other than DOI records be verified for accuracy?

Survey responses will only be collected from individual employees and are not verified for accuracy.

How will data be checked for completeness?

Employee survey responses are voluntary and will not be checked for completeness.

Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Survey responses are not checked to ensure data is current.

Are the data elements described in detail and documented? If yes, what is the name of the document?

Survey questions will be documented and described in each survey. Survey responses are anonymous.

ATTRIBUTES OF THE DATA:

Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes. Survey responses will be used to help decision makers identify issues and understand factors that influence DOI employees in order to improve programs and services.

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 new personally identifiable information will be requested or derived from survey responses. Survey responses are anonymous.

Will the new data be placed in the individual's record?

No new data will be collected or placed in individual employee records. Survey responses and aggregate data are used to create report summaries to help DOI decision makers understand factors that influence DOI employees, identify key issues, and improve programs and services.

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

No, survey responses collected from employees will be anonymized.

How will the new data be verified for relevance and accuracy?

Survey answers are not verified for relevance and accuracy, and are limited to opinions and feedback on DOI programs.

If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

PII data is not being collected or consolidated. Survey responses are anonymized and can be produced as responses, aggregated data, or report summaries. Only system administrators and authorized personnel have access to the survey data, and access is determined on a need to know basis in the performance of official duties.

If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

No processes are being consolidated.

How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

DOI does not retrieve data on individuals. Survey responses are anonymous and are not linked to individuals. DOI does not collect, maintain or disseminate PII on individuals from use of Zoomerang.

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

No reports are produced on individuals. DOI may generate reports with aggregated survey results or summaries from use of Zoomerang. However, report summaries do not identify individuals and do not contain personally identifiable information. Each office that administers a survey will have access to the survey responses and reports.

What opportunities do individuals have to decline 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.)

Providing survey responses is voluntary, and responses are anonymous, there is no requirement for DOI employees to answer Zoomerang surveys.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

What are the retention periods of data in this system?

Survey results produced from use of Zoomerang are subject to Federal records requirements. Records retention periods for survey data will vary depending on the subject of the survey and the records schedule for the DOI bureau or office administering the survey, and will require an appraisal by the appropriate bureau records officer.

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?

Approved disposition of paper records or hard copy media includes shredding, burning and tearing, and electronic records are degaussed in accordance with 384 DM1.

How does the use of this technology affect public/employee privacy?

DOI use of Zoomerang does not affect employee privacy as DOI does not collect, maintain, or disseminate any PII from Zoomerang. Survey responses are anonymous and are limited to opinions and feedback on DOI programs. There is no impact on public privacy as surveys apply only to DOI employees.

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

N/A – this is not a Privacy Act system of records. Data is not retrieved by name or other unique identifier, rather data is retrieved in aggregated results or summaries. Employee survey responses are anonymous and are not identifiable to the employee.

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

N/A – this is not a Privacy Act system of records.

ACCESS TO DATA:

Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Only e-mail addresses and anonymized survey data are available through the system. Such data is available only to survey administrators, authorized DOI personnel and Zoomerang administrators.

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

Zoomerang administrators provide each DOI survey administrator access to their own survey data in the Zoomerang application. DOI survey administrators may grant employees, on an official need to know basis, access to survey data obtained from Zoomerang.

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

Survey administrators will have access to their own survey data. DOI employees will not have access to survey data beyond their own survey responses.

What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

PII is not collected or maintained in the Zoomerang surveys, and all survey responses are anonymous. Access to survey data is restricted to administrators and authorized personnel. DOI personnel must complete annual security, privacy and records training, and will only be able to view anonymous or summarized data.

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?

Yes, Zoomerang is a third-party independently operated software as a service online survey application. DOI does not have a part in the development or maintenance of Zoomerang.