Adapted Privacy Impact Assessment

SurveyMonkey

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Contact

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One Privacy Impact Assessment (PIA) may be prepared to cover multiple websites or applications that are functionally comparable as long as agency or bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the Office of the Chief Information Officer (OCIO) for review and approval.

SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

1.1 What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

The mission of the Bureau of Ocean Energy Management (BOEM) is to manage development of U.S. Outer Continental Shelf (OCS) energy and mineral resources in an environmentally and economically responsible way. BOEM sees public input as a critical component of the safe and responsible exploration and development of offshore resources and regularly solicits public engagement and comment in its environmental review and regulatory programs for oil, gas, and renewable energy proposals. In addition to accepting public comments online and organizing small community meetings on specific issues, BOEM coordinates OCS renewable energy activities offshore with its federal, state, local, and tribal government partners through focused meetings led by the BOEM Renewable Energy Program.

Regulations for the OCS Renewable Energy Program provide a framework for issuing leases, easements and rights-of-way for OCS activities that support production and transmission of energy from sources other than oil and natural gas (e.g., offshore wind energy, ocean wave energy, and ocean current energy). The BOEM Renewable Energy Program uses meetings with stakeholders and partners to help carry out its responsibilities for authorizing OCS renewable energy activities. Meetings facilitate stakeholder engagement and allow BOEM and its stakeholders and partners to identify and address issues early in the planning process for future offshore renewable energy leasing and development. Information about BOEM Renewable Energy Program activities is available at [https://www.boem.gov/Renewable-Energy/](https://www.boem.gov/Renewable-Energy/).

SurveyMonkey is a cloud-based online survey application that allows BOEM to quickly and easily create and administer online surveys to collect registration information from stakeholders and partners. BOEM decision makers will use the registration information for logistical planning purposes to ensure that the meetings run smoothly and efficiently. Primary responsibility for the management of SurveyMonkey user accounts will be held by authorized BOEM staff and contractors who use SurveyMonkey to collect meeting registration information. The Department of the Interior (DOI) Office of Communications will be responsible for providing guidance on social media services. The BOEM Office of Public Affairs will be responsible for ensuring that BOEM stakeholder engagement activities are undertaken in accordance with DOI Office of Communications guidance, as well as coordinating with the BOEM Section 508 Coordinator and the BOEM Associate Privacy Officer to ensure that all use of SurveyMonkey for stakeholder engagement is consistent with all applicable laws, regulations and policies.
1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

BOEM's use of SurveyMonkey is consistent with all applicable laws, regulations and policies. BOEM Renewable Energy Program staff and contractors who use SurveyMonkey to manage registration for stakeholder and partner activities (e.g., Intergovernmental Renewable Energy Task Force and Offshore Wind Power Permitting Subgroup meetings) are responsible for ensuring that all uses of the third-party application are undertaken in accordance with applicable federal laws, regulations, and DOI privacy, security, and social media policies. Any planned use of SurveyMonkey that falls outside the scope of this assessment will require a complete PIA exclusive to the SurveyMonkey use.


SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

2.1 What PII will be made available to the agency?

The SurveyMonkey privacy policy specifies what personally identifiable information (PII) and non-personal data the application collects from meeting registrants and how it uses the information to manage its services and business. Limited PII will be made available to authorized BOEM personnel and contractors through SurveyMonkey. This limited PII includes the generally publicly available non-sensitive, business-related contact information (e.g., official title and email address) of stakeholders and partners (federal officials and elected state, local, and federally recognized tribes, tribal officials, or designated member representatives).

Stakeholders and partners may also contact BOEM via email. In these cases, the PII that BOEM may collect includes basic contact information, such as name and business-related email address. BOEM will use the contact information and other information provided to address their inquiries. Email messages that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the same disposition schedule as all other federal records. BOEM will preserve such emails and maintain them for the applicable period of time if those emails meet the definition of federal records. Emails that are not federal records are deleted when no longer needed.
2.2 What are the sources of the PII?

Sources of information are stakeholders and partners who provide their name and non-sensitive, business-related contact information in order to register to attend a scheduled BOEM-sponsored meeting.

2.3 Will the PII be collected and maintained by the agency?

The information provided by stakeholders and partners during meeting registration is made available to authorized BOEM staff and contractors. BOEM meeting organizers will provide the registration page link to stakeholders and partners. Requested non-sensitive, business-related PII will be limited in nature; meeting-related questions included by BOEM meeting organizers may vary, as necessary, for logistical planning or other limited meeting-related purposes.

BOEM will maintain registration information on the SurveyMonkey platform as long as necessary to manage logistical issues. Any records that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the applicable disposition schedule. The BOEM Renewable Energy Program generally maintains stakeholder outreach-related records under BOEM Bucket 4 - Energy and Mineral Leases - item 4L(1): Renewable Energy Stakeholder Outreach (N1-589-12-4). The retention is “TEMPORARY. Cut off at close of FY or when activity is completed. Retain onsite or at an off site storage. Delete/Destroy 25 years after cutoff.” Any records created that do not fall under this record schedule must be maintained under the applicable records schedule.

2.4 Do the agency’s activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, BOEM is not using SurveyMonkey to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act. Any planned use of SurveyMonkey that falls outside the scope of this assessment will require a complete PIA exclusive to the SurveyMonkey use and coordination with the BOEM Information Collection Clearance Officer.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

The BOEM Renewable Energy Program uses SurveyMonkey to efficiently manage logistics for meetings with stakeholders and partners. SurveyMonkey makes the limited non-sensitive, business-related PII provided by stakeholders and partners registering for scheduled meetings available to authorized BOEM staff and contractors. BOEM meeting organizers will specify the level of requested information when they create meeting registration pages. Only authorized BOEM staff and contractors will have access to all of the information stakeholders and partners have provided to complete meeting registration and are bound to use the information only for the expressed purpose(s) specified in the BOEM Privacy Notice.
BOEM does not share PII it accesses through its use of SurveyMonkey except in unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI policy. BOEM may use the PII to notify the appropriate agency officials or law enforcement organizations.

3.2 Provide specific examples of the types of uses to which PII may be subject.

The SurveyMonkey privacy policy outlines what PII and non-personal data it collects from users and how it uses the information to manage its services and business. The privacy policy acknowledges that survey creators own all survey data. SurveyMonkey treats the surveys as if they were private (unless the surveys have been made available via a public link). SurveyMonkey also does not sell or share survey responses with third-party advertisers or marketers.

BOEM meeting organizers will provide the registration page link to stakeholders and partners. By completing a meeting registration form, stakeholders and partners are acknowledging that they have a) read SurveyMonkey’s privacy policy, b) read BOEM’s Privacy Policy and Privacy Notice, and c) agree that SurveyMonkey may share their information with BOEM.

The information provided by stakeholders and partners during meeting registration is made available to authorized BOEM staff and contractors. The limited PII collected from stakeholders and partners is necessary for logistical purposes. BOEM staff and contractors who are authorized to use SurveyMonkey to manage meeting registration are responsible for the safeguarding and proper use of the information of stakeholders and partners. These officials are bound to use the provided information only for the expressed purpose(s) specified in the BOEM Privacy Notice.

To update their registration status, stakeholders and partners may email the contact specified on the registration page. If stakeholders and partners contact BOEM via email, BOEM will use the information to provide information or requested services. Email messages that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the same disposition schedule as all other federal records. The BOEM Renewable Energy Program generally maintains stakeholder outreach-related records under BOEM Bucket 4 - Energy and Mineral Leases - item 4L(1): Renewable Energy Stakeholder Outreach (N1-589-12-4). The retention is “TEMPORARY. Cut off at close of FY or when activity is completed. Retain onsite or at an off site storage. Delete/Destroy 25 years after cutoff.” Any records created that do not fall under this record schedule must be maintained under the applicable records schedule. Emails that are not federal records are deleted when no longer needed.

BOEM does not share PII through its use of SurveyMonkey externally except in unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI policy. BOEM may use the PII to notify the appropriate agency officials or law enforcement organizations.
SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

All SurveyMonkey uses of PII are detailed in the application's privacy policy, which outlines what PII and non-personal data it collects from registrants and how it uses the information to manage its services and business.

Authorized BOEM staff and contractors who use SurveyMonkey to collect BOEM-sponsored meeting registration information will have access to the non-sensitive, business-related PII and other requested meeting-related information submitted by registering stakeholders and partners. The contact information of stakeholders and partners is generally publicly available. BOEM meeting organizers may share non-sensitive registration information with meeting co-sponsors and contractors/service providers who have a need-to-know, as noted in the BOEM Privacy Notice. If a stakeholder or partner contacts BOEM via email, BOEM will use the information only to provide information or requested services.

BOEM does not share PII through its use of SurveyMonkey except in unusual circumstances where user interactions indicate evidence of criminal activity, a threat to the U.S. Government, a threat to the public, or an employee violation of DOI policy. BOEM may use the PII to notify the appropriate agency officials or law enforcement organizations.

4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

All uses of SurveyMonkey to plan and manage stakeholder and partner activities must be approved in advance by a designated BOEM official. In the event that an employee leaves or changes roles, this designated official must also ensure that the departing individual's SurveyMonkey account access is revoked. BOEM meeting organizers must adhere to all DOI Office of Communications guidance and act in accordance with all applicable federal laws, regulations, and DOI privacy, security, and information management policies. The DOI Digital Media Guide provides official guidance to bureaus and offices in their use of social media and related tools. The associated Social Media Policy outlines specific rules for the use of social media at Interior. BOEM must also abide by the SurveyMonkey Terms of Use in order to continue use of the service.

SurveyMonkey is responsible for protecting its users' privacy and the security of users' data in accordance with its Security Statement. BOEM meeting organizers are accountable for the proper use of the information provided by stakeholders and partners, as well as the protection of their account information. BOEM meeting organizers who use SurveyMonkey are not permitted to share their account information or meeting registration-related information with unauthorized individuals. A failure to safeguard account information and ensure the integrity of BOEM information may violate the DOI Rules of Behavior.
SECTION 5: Maintenance and Retention of PII

5.1 How will the agency maintain the PII, and for how long?

The PII that BOEM may collect when stakeholders and partners register to attend a scheduled BOEM-sponsored meeting includes generally publicly available non-sensitive, business-related information, such as name, official title, and email address. BOEM will use the contact information and other requested information provided by stakeholders and partners for logistical purposes. All of the information provided by stakeholders and partners is maintained on SurveyMonkey servers and retained by the third-party in accordance with its privacy policy.

BOEM will maintain registration information on the SurveyMonkey platform as long as necessary to manage logistical issues. Any records that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the applicable disposition schedule. The BOEM Renewable Energy Program generally maintains stakeholder outreach-related records under BOEM Bucket 4 - Energy and Mineral Leases - item 4L(1): Renewable Energy Stakeholder Outreach (N1-589-12-4). The retention is “TEMPORARY. Cut off at close of FY or when activity is completed. Retain onsite or at an off site storage. Delete/Destroy 25 years after cutoff.” Any records created that do not fall under this record schedule must be maintained under the applicable records schedule.

Email messages that meet the definition of records in the Federal Records Act (44 U.S.C. § 3101) are covered under the same disposition schedule as all other federal records. BOEM programs will preserve such emails and maintain them for the applicable period of time if those emails meet the definition of federal records. PII that is not part of a federal record subject to NARA retention requirements will be retained as needed, and then promptly destroyed. Approved methods for disposition of records include shredding, burning, tearing, and degaussing in accordance with NARA guidelines and 384 Departmental Manual 1.

5.2 Was the retention period established to minimize privacy risk?

There are minimal privacy risks associated with BOEM’s use of SurveyMonkey to manage meeting registration, as BOEM does not collect any sensitive PII from stakeholders and partners; all collected PII is business-related and generally publicly available. BOEM will maintain stakeholder outreach-related records in accordance with the applicable records schedule. PII that is not part of a federal record subject to NARA retention requirements will be retained as needed, and promptly destroyed.

SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

Yes, privacy and security officials will coordinate to develop methods of securing PII. Authorized BOEM staff and contractors who use SurveyMonkey must adhere to all DOI Office of Communications guidance and act in accordance with all applicable federal laws, regulations, and DOI privacy, security, and information management policies while using the service.
There are also mandatory requirements for BOEM employees and contractors to complete security and privacy awareness training and sign the DOI Rules of Behavior form before getting access to any DOI/BOEM system. Access to the BOEM network (BSEENet) is restricted to authorized users with two-factor authentication and servers are located in secured facilities behind restrictive firewalls.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

There is minimal impact on the privacy of stakeholders and partners who submit meeting registration information to BOEM through SurveyMonkey, as BOEM will not collect, access, or maintain any sensitive PII through its use of SurveyMonkey. The limited PII BOEM collects from stakeholders and partners is business-related and generally publicly available. Also, any official meeting-related information that BOEM may distribute through SurveyMonkey will be reviewed and approved by program officials for dissemination prior to posting, so any privacy risks for the unauthorized disclosure of PII or sensitive bureau information is mitigated.

By completing meeting registration, stakeholders and partners are acknowledging that they have a) read SurveyMonkey’s privacy policy, b) read BOEM’s Privacy Policy and Privacy Notice, and c) agree that SurveyMonkey may share their information with BOEM. BOEM systems do not share data with SurveyMonkey. By providing links to these resources, BOEM promotes transparency and provides an upfront notice to individuals on BOEM’s collection, use, maintenance, and disposition of PII during interactions on its websites and social media applications.

BOEM does not control the SurveyMonkey privacy policy. All information provided by stakeholders and partners for meeting registration will reside on SurveyMonkey servers until it is deleted. SurveyMonkey is responsible for protecting its users’ privacy and the security of users’ data, in accordance with its Security Statement. BOEM meeting organizers are accountable for the proper use of attendees’ information. A designated official will manage access to the program’s active password-protected SurveyMonkey accounts. Access will be determined on a need-to-know basis in the performance of official duties and BOEM meeting organizers will have access only to the account they use to post and manage meeting-related pages. BOEM meeting organizers may also share registration information with meeting co-sponsors and contractors/service providers who have a need-to-know in order to manage meeting logistics, as noted in the BOEM Privacy Notice.

BOEM meeting organizers must adhere to all DOI Office of Communications guidance and act in accordance with all applicable federal laws, regulations, and DOI privacy, security, and information management policies while using SurveyMonkey. The DOI Digital Media Guide provides official guidance to bureaus and offices in their use of social media and related tools. The associated Social Media Policy outlines specific rules for the use of social media at Interior.
SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1 What other privacy risks exist, and how will the agency mitigate those risks?

BOEM's use of SurveyMonkey is subject to the application's privacy policy. The privacy policy acknowledges that survey creators (i.e., BOEM programs) own all survey data. SurveyMonkey treats the surveys as if they were private (unless the surveys have been made available via a public link). SurveyMonkey also doesn't sell or share survey responses with third-party advertisers or marketers. BOEM will primarily issue private registration links to stakeholders and partners.

SurveyMonkey enables the integration of other third-party applications which may present risks to the user's privacy. BOEM will not integrate any other third-party applications to facilitate meeting registration. BOEM staff and contractors authorized to manage SurveyMonkey accounts will not grant third parties permission to share their information with SurveyMonkey (i.e., authorized BOEM account users will not be permitted to sign into SurveyMonkey via other third-party applications).

While it may be possible for stakeholders and partners to send sensitive personal information to BOEM through a registration form, it is not anticipated that any such information will be shared with BOEM in this manner. BOEM will remind stakeholders and partners not to share sensitive information with BOEM via SurveyMonkey in the notice it provides during the registration process.

7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?

BOEM provides appropriate notice to individuals informing them of privacy risks associated with the use of SurveyMonkey. Individuals are provided with access to the SurveyMonkey privacy policy and Security Statement, the BOEM Privacy Policy, and a BOEM Privacy Notice. By completing a meeting registration form, stakeholders and partners are acknowledging that they have a) read SurveyMonkey’s privacy policy, b) read BOEM's Privacy Policy and Privacy Notice, and c) agree that SurveyMonkey may share their information with BOEM.

BOEM provides appropriate notice to individuals to inform them of the bureau’s use, handling, and protection of the information BOEM has requested from attendees to complete meeting registration. The SurveyMonkey privacy policy specifies what PII and non-personal data the application collects from users and how it uses the information to manage its services and business. The SurveyMonkey Security Statement provides information about the service’s security infrastructure and practices. The BOEM Privacy Notice informs users as to how BOEM will handle PII that becomes available through SurveyMonkey and directs users to the BOEM Privacy Policy for information handling practices. The BOEM Privacy Policy informs the public that BOEM has no control over access restrictions or privacy procedures on third-party websites, and that individuals are subject to third-party website privacy and security policies. BOEM's linking policy informs the public that they are subject to third-party privacy policies when they leave a BOEM official website to link to third-party websites.
SECTION 8: Creation or Modification of a System of Records

8.1 Will the agency’s activities create or modify a "system of records" under the Privacy Act of 1974?

The SurveyMonkey application enables BOEM to quickly and easily create and administer online surveys to collect registration information from stakeholders and partners. BOEM decision makers will use the registration information for logistical planning services to ensure that the meetings run smoothly and efficiently. The information of registrants representing federal, state, local, and tribal government partners will become available to BOEM staff and contractors who manage meeting registration activities.

BOEM’s use of SurveyMonkey will not create or modify a system of records under the Privacy Act. Any BOEM use of SurveyMonkey that creates a system of records will require a separate PIA for that specific use and collection of information, and BOEM must maintain the records in accordance with DOI-08, Social Networks system of records notice, or other applicable system of records notice, as appropriate. DOI and BOEM Privacy Act system of records notices may be viewed on the DOI SORN website at https://www.doi.gov/privacy/sorn.

8.2 Provide the name and identifier for the Privacy Act system of records.

BOEM will generally not maintain or disseminate PII obtained from its use of SurveyMonkey in any way that creates a system of records. Any planned use of SurveyMonkey that falls outside the scope of this assessment will require a complete PIA exclusive to the SurveyMonkey use and collection of information, and BOEM must maintain the records in accordance with DOI-08, Social Networks system of records notice, or other applicable system of records notice, as appropriate. DOI and BOEM Privacy Act system of records notices may be viewed on the DOI SORN website at https://www.doi.gov/privacy/sorn.