Privacy Impact Assessment
for the

IdeaFactory

January 21, 2010

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Abstract

IdeaFactory is an Intranet Web-based tool that uses social media concepts to enable innovation and organizational collaboration within the Department of Homeland Security (DHS). IdeaFactory empowers employees to develop, rate, and improve innovative ideas for programs, processes, and technologies. This privacy impact assessment is being conducted because the site will collect limited personally identifiable information (PII) on users submitting ideas.

Overview

IdeaFactory is an Intranet Web-based tool owned by the Office of the Under Secretary for Management designed to enable innovation and organizational collaboration. This internal communication tool gives all DHS employees a virtual voice and a means to participate in how the organization operates and evolves which will in turn promote greater job satisfaction and enhance organizational effectiveness. IdeaFactory engages the DHS workforce and enables them to 1) suggest new ideas; 2) rate ideas; 3) comment to improve ideas; and 4) learn when submitted ideas are recognized and implemented. IdeaFactory highlights initiatives that can streamline agency operations and improve morale, provide direct feedback to program offices, and enable program offices to communicate strategically with the workforce.

The DHS IdeaFactory Council (IFC) has been formed to discuss and evaluate cross-cutting ideas that might involve or impact multiple DHS components; share ideas being implemented within each component to facilitate and enhance "One DHS" objectives; share and leverage IdeaFactory program management best practices across DHS components; monitor idea trends and "employee pulse" across components that may inform broad DHS strategic decisions; and identify and prioritize information technology (IT) requirements for IdeaFactory site enhancements.

The IdeaFactory system includes links to information about the posting and protection of sensitive information, Terms of Use, Privacy Policy, FAQs, and a "contact us" link that launches an Outlook email monitored by organizational leads.

Users have the ability to "build" and "suggest" new ideas, rate and comment on ideas submitted by others, respond to a comment that others have made, and mark a comment as helpful or not helpful. Users can add an idea as one of their "favorites" to keep track of in their profile page and also be able to identify more easily in the "Search and Filter" tool. Ideas can be assigned one of six statuses, including "Ideas in Action," "Current Activity," "Under Review," "Unable to Implement," "Ideas We're Watching," and "Mythbuster."[1]

An individual's "Profile Page" is a customizable personalization page that includes: Profile, Statistics, and History. It allows users to track their participation on IdeaFactory and provides other users and IdeaFactory Team with the ability to gather information on the community. Information included is provided on a voluntary basis, and users can opt to show or not show this information. Information on the personal profile page includes location, department, and position. In addition, employees could choose to

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[1] "Mythbuster" is a category where faulty and misleading information such as rumors and myths are clarified and corrected.

supply optional information in the signature of their submissions, but could also elect to not make that information available to other users.

A typical transaction in the system consists of users posting ideas, commenting on ideas, and/or rating ideas already in the system.

Information shared by the system is limited to internal communications. Use of the IdeaFactory is limited to DHS employees and contractors who are logging on to the DHS intranet through networked DHS computers or personal computers using the DHS Virtual Private Network (VPN). All comments will be identifiable by the individual's name or user name. Employees and contractors who use the IdeaFactory must log on using their own, DHS-assigned user name. A unique username is assigned to all DHS employees, generally consisting of the employee's first and last name, and is used to log onto their component server and gains access to their e-mail.

Users can directly update their profile information themselves. Inaccurate information submitted as an idea or a comment can be corrected by the site administrators only, upon being notified by the poster, or appropriate subject matter experts within the program offices or on the DHS IdeaFactory Council. If inaccurate information is posted online, staff monitoring IdeaFactory reply to the comment correcting the information.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

Information collected in the system consists of the ideas, comments, and rating of ideas that are submitted voluntarily by the front end users (DHS employees and contractors who have a DHS log-in). In addition, employees' DHS-assigned user name will be collected; employees may choose to input data about themselves that includes their department, office location, and title. Employees may also opt to keep this information private from other users of the IdeaFactory website.

1.2 What are the sources of the information in the system?

The sources of the information are the individual users. Use of IdeaFactory is limited to DHS employees and contractors who are logging on to the DHS intranet through networked DHS computers or personal computers using the DHS Virtual Private Network (VPN). All comments will be identifiable by the individual's name or user name. Employees and contractors who use the IdeaFactory must log on using their own, DHS-assigned user name.

1.3 Why is the information being collected, used, disseminated, or maintained?

IdeaFactory is an Intranet Web-based tool designed to enable innovation and organizational collaboration within the agency. This is accomplished through user submission of ideas that can result in the creation of national programs or initiatives, changes in the Standard Operation Procedures, or local practices. Through this special forum for the submission of ideas the objective of "one DHS" will be facilitated, and DHS as a whole will be improved through collaboration.

1.4 How is the information collected?

Information collected in the system consists of the ideas, comments, and rating of ideas that are submitted voluntarily by the front end users (DHS employees and contractors who have a DHS log-in). This information is posted directly to the site and does not go through a vetting or moderation process prior to being posted, however, site administrators do have the capability to remove posts that do not abide by the Terms of Use.

1.5 How will the information be checked for accuracy?

The posting of any unprofessional, false, misleading, profane, or defamatory material will not be tolerated, and such material will be removed from this website. Information will be monitored by a network of organizational leads throughout DHS and their components involved in the project. DHS does not guarantee or warrant that any information posted by its employees on the IdeaFactory information is correct, and disclaims any liability for any loss or damage resulting from reliance on any such information. DHS may not be able to verify, does not warrant or guarantee, and assumes no liability for anything posted on this website by any other person. Links to websites not maintained by DHS are provided on this website solely for the information and convenience of users, and do not constitute either a warranty of the accuracy of the information on any other website or an endorsement of any other website, commercial venture, or product. DHS is not directly associated with and cannot assume liability for any private enterprise or the acts or omissions of its employees except to the extent provided by the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b)(1), 1402(b), 2401(b), 2671-2680.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

Pursuant to the delegation of authority set forth in DHS Delegation #0201.1, the Under Secretary for Management has the management authority for financial matters, procurement, human resources, and information technology / communications systems. Therefore, the IdeaFactory initiative falls within the statutory purview of the Management Directorate as set forth in the Homeland Security Act of 2002.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

In developing IdeaFactory, there was a risk that the site would be set up to collect more PII than is necessary to accomplish the purpose of the site. To mitigate this risk, in designing the program, DHS decided to collect as little PII as necessary, specifically, only the user idea and an associated user name. The collection of this information facilitates accountability to the individual and allows DHS to provide feedback on submissions. A user has the option to add more PII to his Profile Page and to set appropriate viewing restrictions, but this is voluntary and not required to use the IdeaFactory.

There is also a risk that users will post inappropriate, irrelevant, or duplicative content. To mitigate these risks, IdeaFactory has an official Terms of Use which includes any laws, regulations, or policies incorporated by reference (e.g., the DHS Management Directive on Employee Responsibilities and Conduct). By using the IdeaFactory, employees agree to all of the terms of use. Failure to fully comply with the terms of use or any related laws, rules, and regulations may result in corrective action, including discipline, up to and including an employee's removal from the IdeaFactory site.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

The IdeaFactory is an Intranet Web-based tool designed to enable innovation and organizational collaboration within the agency. This is accomplished through user submission of ideas that can result in the creation of national programs or initiatives, changes in the Standard Operation Procedures, or local practices. The IdeaFactory is a special forum for the submission of ideas on improving DHS.

2.2 What types of tools are used to analyze data and what type of data may be produced?

The IdeaFactory Intranet Web-based tool does not have analytical capabilities beyond sorting and searching. Analyses of ideas presented in the IdeaFactory are conducted off line by DHS employees who are subject matter experts in program offices. IdeaFactory has basic reporting capabilities that allow site administrators to obtain analyses of user-related activity and idea-related activity on the site for specified time periods.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

Information is not obtained through commercial or publicly available data.

2.4 <u>**Privacy Impact Analysis**</u>**: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

There is a risk that the information submitted may be reviewed out of context of a particular program. This risk is minimized by the fact that the each individual DHS components, as well as DHS HQ, only have access to their individual sites and so may have a better understanding of the ideas presented by fellow users. Other components will not have direct access to review and comment ideas outside of their component.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1   What information is retained?

Ideas submitted, along with comments and ratings to the site by DHS employees, are retained.

3.2   How long is information retained?

The DHS Privacy Office is working with the DHS Senior Records Officer in developing a retention schedule to be submitted for NARA approval.

3.3   Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

The DHS Privacy Office is working with the DHS Senior Records Officer in developing a retention schedule to be submitted for NARA approval.

3.4   <u>Privacy Impact Analysis</u>: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

The DHS Privacy Office is working with the DHS Senior Records Officer in developing a retention schedule to be submitted for NARA approval.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

Information is shared as presented by the user who inputs the original data, and information may be shared with the program offices responsible for determining the viability of the idea presented. In addition, ideas may be shared across DHS components as part of DHS IdeaFactory Council activities. Profile information submitted may be shared with other users if approved by the user.

4.2 How is the information transmitted or disclosed?

Information is transmitted electronically via the IdeaFactory site.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Because the IdeaFactory is used by internal DHS employees only, the privacy risks associated with sharing IdeaFactory data is minimal. Risks will be mitigated by providing guidance to components on what type of information they can collect from users in the profile fields and periodically reviewing the components profile pages to ensure they are in compliance with privacy standards. All profile fields, beyond user name, are voluntary and are not a requirement to use the site.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Although this information is not routinely shared outside DHS, successful and positive ideas may be shared in some instances. In the event a positive idea is implemented, the individual responsible for the idea may be asked to consent to the sharing of their name with external partners for appropriate recognition.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

This information is not routinely shared outside DHS, but if it is, this sharing will be compatible with the original collection and covered by the routine uses in DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) SORN, published in the Federal Register at 73 FR

28139.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

This information is not routinely shared outside DHS, but if it is, it will be consistent with the DHS/ALL-004 GITAARS SORN.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Information is not routinely shared externally; however, in certain cases of implementation of a positive idea and upon consent, the name of individual responsible for the idea may be shared with external entities for recognition purposes.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Notice is provided in the DHS/ALL-004 GITAARS SORN, published in the Federal Register at 73 FR 28139, as well as in this PIA. DHS will also make available a Privacy Policy at the Login page of the webpage with its contact information. These features notify the submitter of the way that DHS uses their PII.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Yes. The system is entirely voluntary.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

DHS does not guarantee that material submitted to the IdeaFactory will be used for the purposes intended by the submitter. Matter submitted to this website becomes the property of DHS upon submission and DHS may use it for any lawful purpose. Among other things, DHS may investigate or refer for investigation by federal, state, or local law enforcement authorities, or an employee's supervisor, any matter that may relate to a violation or potential violation of civil or criminal law or regulation.

6.4 **Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

All users voluntarily provide ideas and comments to the IdeaFactory and are made aware of the data collection through the Privacy Policy presented at Login Page of IdeaFactory. If a DHS employee chooses to submit ideas and comments on other's ideas in the IdeaFactory, he is notified that the material submitted becomes the property of DHS and may be used for any lawful purpose. Additional notice is provided through this PIA and in DHS/ALL-004 GITAARS SORN.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 **What are the procedures that allow individuals to gain access to their information?**

Agreeing to the Terms of Use allows employees access to the site and the information they have voluntarily submitted. Individuals may also access the ideas submitted by using the Privacy Act/FOIA process outlined on the DHS website at www.dhs.gov/privacy.

7.2 **What are the procedures for correcting inaccurate or erroneous information?**

Users can directly update their profile information themselves. Inaccurate information submitted as an idea or a comment can be corrected by the site administrators only, upon being notified by the poster, or appropriate subject matter experts within the program offices or on the DHS IdeaFactory Council. If inaccurate information is posted online, staff monitoring IdeaFactory may reply to the comment correcting the information.

7.3 **How are individuals notified of the procedures for correcting their information?**

The DHS/ALL-004 GITAARS SORN and this PIA outline the procedures for correcting information.

7.4 **If no formal redress is provided, what alternatives are available to the individual?**

Risks associated with inaccurate information are mitigated by the user's ability to access and update their Profile Page which contains the personal information they originally submitted. Individuals, who submit ideas and later determine they would like to remove the posting, may contact a site administrator to deactivate the posting or may submit a FOIA request.

7.5 <u>**Privacy Impact Analysis**</u>**: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

Any risk that the individual may not be able to correct his information is mitigated by allowing individuals to request access or amendment of their postings at any time either by contacting a site administrator or submitting a FOIA request as outlined on the DHS website.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

All DHS employees and contractors with a DHS log-in will have access to Idea Factory. Users will authenticate to a DHSNET Active Directory Server. There are no group accounts or shared accounts.

8.2 Will Department contractors have access to the system?

Yes.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

During user training, users will be instructed not to enter any personal information into the IdeaFactory application. All users are required to attend annual security awareness training.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Yes, the IdeaFactory application will be a minor application on the DHS OCIO Microsoft Office SharePoint Server (MOSS), which has completed C&A. The MOSS 2007 system was granted ATO in January 2009 and is authorized to process at the following Confidentiality, Integrity, and Availability levels: HIGH, Moderate.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

There will be a reporting mechanism to audit data, and application administrators will be regularly monitoring the data. The MOSS 2007 servers audit logs are reviewed weekly by the ISSO.

8.6 **Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

This technology is for internal use only, requiring no compensating or addition controls to assure privacy of the limited amount of PII contained on the system.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 What type of project is the program or system?

The program is an enterprise application development project.

9.2 What stage of development is the system in and what project development lifecycle was used?

The current stage is design and development; The DHS SELC was used for development.

9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

No the technology use does not raise privacy concerns.

Responsible Officials

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Under Secretary for Management

Approval Signature

Original signed copy on file with the DHS Privacy Office

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