



Privacy and Civil Liberties Impact Assessment  
for the

**OFFICE OF FINANCIAL RESEARCH (“OFR”)  
WEBSITE**

June 29, 2016

**Reviewing Official**

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## Section 1.0: Introduction

It is the policy of the Department of the Treasury (Treasury” or “Department”) and its Bureaus to conduct a Privacy and Civil Liberties Impact Assessment (“PCLIA”) when [Personally Identifiable Information](#) (“PII”) is maintained in a system or by a project. PCLIA’s are required for all systems and projects that collect, maintain, or disseminate [PII](#), regardless of the manner in which the information is retrieved.

This assessment is being completed pursuant to Section 208 of the [E-Government Act of 2002](#) (“E-Gov Act”), 44 U.S.C. § 3501, Office of Management and Budget (“OMB”) Memorandum 03-22, “[OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002](#),” and Treasury Directive 25-07, “[Privacy and Civil Liberties Impact Assessment \(PCLIA\)](#),” which require Treasury Offices and Bureaus to conduct a PCLIA before:

1. developing or procuring [information technology](#) (“IT”) systems or projects that collect, maintain, or disseminate [PII](#) from or about members of the public, or
2. initiating a new collection of information that: **a)** will be collected, maintained, or disseminated using [IT](#); and **b)** includes any [PII](#) permitting the physical or online contacting of a specific individual, if identical questions have been posed to, or identical reporting requirements imposed on, 10 or more persons. Agencies, instrumentalities, or employees of the federal government are not included.

This PCLIA provides the following information regarding the system or project:

- (1) an overview of its purpose and functions;
- (2) a description of the information collected;
- (3) a description of how the information is maintained, used, and shared;
- (4) an assessment of whether the system or project is in compliance with federal requirements that support information privacy; and
- (5) an overview of the redress/complaint procedures available to individuals who may be affected by the use or sharing of information by the system or project.

The OFR Website is a new system. This PCLIA is the first conducted for this system.

## Section 2.0: Definitions

**Agency** – means any entity that falls within the definition of the term “executive agency” as defined in 31 U.S.C. § 102, or “agency”, as defined in 44 U.S.C. § 3502.

**Certifying Official** – The Bureau Privacy and Civil Liberties Officer(s) who certify that all requirements in TD and TD P 25-07 have been completed so a PCLIA can be reviewed and approved by the Treasury Deputy Assistant Secretary for Privacy, Transparency, and Records.

**Collect (including “collection”)** – means the retrieval, receipt, gathering, or acquisition of any PII and its storage or presence in a Treasury system. This term should be given its broadest possible meaning.

**Contractors and Service Providers** – include, but are not limited to, information providers, information processors, and other organizations providing information system development, information technology services, and other outsourced applications.

**Data Mining** – The term “data mining” means a program involving pattern-based queries, searches, or other analysis of one or more electronic databases, where-- **(A)** a department or agency of the federal government, or a non-federal entity acting on behalf of the federal government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals; **(B)** the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and **(C)** the purpose of the queries, searches, or other analyses is not solely-- **(i)** the detection of fraud, waste, or abuse in a government agency or program; or **(ii)** the security of a government computer system.

**Disclosure** – When it is clear from its usage that the term “disclosure” refers to records provided to the public in response to a request under the Freedom of Information Act (5 U.S.C. § 552) or the Privacy Act, its application should be limited in that manner. Otherwise, the term should be interpreted as synonymous with the terms “sharing” and “dissemination” as defined in this manual.

**Dissemination** – as used in this manual, is synonymous with the terms “sharing” and “disclosure” (unless it is clear from the context that the use of the term “disclosure” refers to a FOIA/Privacy Act disclosure).

**E-Government** – the use of digital technologies to transform government operations to improve effectiveness, efficiency, and service delivery.

**Federal Information System** – a discrete set of information resources organized for the collection, processing, maintenance, transmission, and dissemination of information owned or under the control of a federal agency, whether automated or manual.

**Final Rule** – After the NPRM comment period closes, the agency reviews and analyzes the comments received (if any). The agency has the option to proceed with the rulemaking as proposed, issue a new or modified proposal or withdraw the proposal before reaching its final decision. The agency can also make any revisions to the supporting analyses contained in the NPRM (e.g., to address a concern raised by a member of the public in response to the NPRM).

**Government information** – information created, collected, used, maintained, processed, disseminated, or disposed of by or for the federal government.

**Individual** – means a citizen of the United States or an alien lawfully admitted for permanent residence. If a question does not specifically inquire about or an issue does not clearly involve a [Privacy Act system of records](#), the term should be given its common, everyday meaning. In certain contexts, the term individual may also include citizens of other countries who are covered by the terms of an international or other agreement that involves information stored in the system or used by the project.

**Information** – means any representation of knowledge such as facts, data, or opinions in any medium or form, regardless of its physical form or characteristics. This term should be given the broadest possible meaning. This term includes, but is not limit to, information contained in a [Privacy Act system of records](#).

**Information technology (“IT”)** – any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency, if the equipment is used by the executive agency directly or is used by a contractor under a contract with the executive agency that requires the use: (i) of that equipment; or (ii) of that equipment to a significant extent in the performance of a service or the furnishing of a product. It includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services), and related resources; but does not include any equipment acquired by a federal contractor incidental to a federal contract.

**Major Information system** – embraces “large” and “sensitive” information systems and means “a system or project that requires special management attention because of its importance to an agency mission; its high development, operating, or maintenance costs; or its significant role in the administration of agency programs, finances, property, or other resources.” OMB Circular A-130, § 6.u. This definition includes all systems that contain [PII](#) and are rated as “MODERATE or HIGH impact” under Federal Information Processing Standard 199.

**National Security systems** – a telecommunications or information system operated by the federal government, the function, operation or use of which involves: (1) intelligence activities, (2) cryptologic activities related to national security, (3) command and control of military forces, (4) equipment that is an integral part of a weapon or weapons systems, or (5) systems critical to the direct fulfillment of military or intelligence missions, but does not include systems used for routine administrative and business applications, such as payroll, finance, logistics, and personnel management.

**Notice of Proposed Rule Making (“NPRM”)** – the Privacy Act (Section (J) and (k)) allow agencies to use the rulemaking process to exempt particular systems of records from some of the requirements in the Act. This process is often, referred to as “notice-and-comment rulemaking.” The agency publishes an NPRM to notify the public that the agency is proposing a rule and provides an opportunity for the public to comment on the proposal before the agency can issue a final rule.

**Personally Identifiable Information (“PII”)** – “means, any information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of this term also incorporates by reference the definition of PII in [OMB Memorandum 06-19](#)<sup>1</sup> and the definition of

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<sup>1</sup> “Any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual’s identity, such as their name, social security number, date and place of birth, mother’s maiden name, biometric

term “Information in Identifiable Form” as defined in § 208(d)<sup>2</sup> of the E-Government Act of 2002, Pub. L.107-347, 116 Stat. 2899 and as further defined in [OMB M 03-22](#).<sup>3</sup>

**Privacy and Civil Liberties Impact Assessment (“PCLIA”)** – a PCLIA is:

- (1) a *process* conducted to: (a) identify privacy and civil liberties risks in systems, programs and other activities that maintain [PII](#); (b) ensure that information systems, programs and other activities comply with legal, regulatory, and policy requirements; (c) analyze the privacy and civil liberties risks identified; (d) identify remedies, protections and alternative or additional privacy controls necessary to mitigate those risks; and (e) provide notice to the public of privacy and civil liberties protection practices.
- (2) a *document* that catalogues the outcome of that privacy and civil liberties risk assessment process.

**Protected Information** – as the term is used in this PCLIA, has the same definition given to that term in TD 25-10, Section 4.

**Privacy Act Record** – any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, the individual’s education, financial transactions, medical history, and criminal or employment history and that contains the individual’s name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.

**Reviewing Official** – The Deputy Assistant Secretary for Privacy, Transparency, and Records who reviews and approves all PCLIA’s as part of her duties as a direct report to the Treasury Senior Agency Official for Privacy.

**Routine Use** – with respect to the disclosure of a record outside of the Department of the Treasury (i.e., external sharing), the use of such record for a purpose which is compatible with the purpose for which it was collected.

**Sharing** – any Treasury initiated distribution of information to government employees or agency contractors or grantees, including intra- or inter-agency transfers or exchanges of Treasury information

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records, etc., including any other personal information which is linked or linkable to an individual.”

2 “Any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.”

3 “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) 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.)”

regardless of whether it is covered by the Privacy Act. It does not include responses to requests for agency records under the Freedom of Information Act ("FOIA") or the Privacy Act. It is synonymous with the term "dissemination" as used in this assessment. It is also synonymous with the term "disclosure" as used in this assessment unless it is clear from the context in which the term is used that it refers to disclosure to the public in response to a request for agency records under the Freedom of Information Act or the Privacy Act.

**System** – as the term used in this manual, includes both federal information systems and information technology.

**System of Records** – a group of any records (as defined in the Privacy Act) under the control of Treasury from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.

**System of Records Notice** – Each agency that maintains a system of records shall publish in the *Federal Register* upon establishment or revision a notice of the existence and character of the system of records, which notice shall include: **(A)** the name and location of the system; **(B)** the categories of individuals on whom records are maintained in the system; **(C)** the categories of records maintained in the system; **(D)** each routine use of the records contained in the system, including the categories of users and the purpose of such use; **(E)** the policies and practices of the agency regarding storage, retrievability, access controls, retention, and disposal of the records; **(F)** the title and business address of the agency official who is responsible for the system of records; **(G)** the agency procedures whereby an individual can be notified at his request if the system of records contains a record pertaining to him; **(H)** the agency procedures whereby an individual can be notified at his request how he can gain access to any record pertaining to him contained in the system of records, and how he can contest its content; and **(I)** the categories of sources of records in the system.

**System Owner** – Official responsible for the overall procurement, development, integration, modification, or operation and maintenance of a system.

## **Section 3.0: System Overview**

### **Section 3.1: System/Project Description**

The purpose of the OFR website ("Website") is to provide information to the public about the OFR's mission, goals, and work products, and to serve as a communication and engagement platform for parties interested in learning about the OFR and its projects. It supports the mission of the Department by promoting transparency, accountability, and engagement with the public about the OFR and Treasury missions.

For the purposes of this document the term "Website" refers to the following collection of technologies and services<sup>4</sup>:

- 1) *Financialresearch.gov* – The cloud-hosted environment on which OFR's public facing website resides;

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<sup>4</sup> While the OFR's website also contains an External Presence Platform (EPP), the hosted cloud environment that expands the capabilities of the Website to support interactive monitors, research collaboration sites, reference databases, and data sharing-related applications, OFR has chosen to address this functionality in a separate PCLIA because of the unique privacy considerations of the system and to enhance transparency.



- 2) **GovDelivery** - The third-party owned and operated communications management system which OFR uses to manage email subscriptions to content;
- 3) **Google Analytics** – The Google Analytics Premium tool which offers advanced web analytics to federal agencies used by General Service Administration (GSA’s) digital analytics program to collect and analyze web traffic data; and
- 4) **Content Management System (CMS)** – The platform OFR leverages to electronically administer (e.g. upload, revise, delete) content on the Website.

OFR originally published a Privacy and Civil Liberties Impact Assessment (PCLIA) for the Website in February 2015. OFR is updating this PCLIA to account for new functionalities being introduced to the Website which implicate the use of Personally Identifiable Information (PII). As additional capabilities are considered, OFR may revise this PCLIA or conduct a separate PCLIA for specific functionalities or tools associated with the Website where unique privacy issues arise.

Number of Individuals Whose Information is Maintained in the System or Project		
<input type="checkbox"/> 0 – 999	<input type="checkbox"/> 1000 – 9,999	<input checked="" type="checkbox"/> 10,000 – 99,999
<input type="checkbox"/> 100,000 – 499,999	<input type="checkbox"/> 500,000 – 999,999	<input type="checkbox"/> 1,000,000+

### Section 3.2: Purpose Specification

The purpose of the Website is to provide information to the public about the OFR’s mission, goals, and work products, and to serve as a communication and engagement platform for parties interested in learning about the OFR. PII is used to the extent necessary to: 1) secure and improve the Website and to administer its content; 2) allow individuals to sign up to receive OFR email updates based on individual needs and interests; 3) allow individuals to contact the OFR and its staff with questions and comments; 4) share publicly available information in the form of white papers, OFR studies, press releases, public meeting agendas, policy statements, public-consumption data sets, and other approved information and materials; and 5) facilitate collaboration with the public as well as select members of academia and industry in the form of interactive monitors, collaboration sites, and data-sharing related applications.

### Section 3.3: Authority to Collect

The statutory authorities for operating this system or performing this project are:

Statute	Description
Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111–203, H.R. 4173)	Establishes the OFR and authorizes the OFR Director to manage administrative functions of the office.
44 U.S.C. § 3101	Instructs the head of each federal agency to “make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency’s activities.”

## Section 4.0: Information Collection

### Section 4.1: Relevant and Necessary

The [Privacy Act](#) requires “each agency that maintains a [system of records](#) [to] maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be fulfilled by statute or by executive order of the President.” 5 U.S.C. § 552a(e)(1).

The [Privacy Act](#) allows federal agencies to exempt records from the relevant and necessary requirement if certain conditions are met. This includes issuing a [Notice of Proposed Rulemaking](#) (“NPRM”) to solicit public opinions on the proposed exemption and issuing a [Final Rule](#) after addressing any concerns raised by the public in response to the [NPRM](#). It is possible for some, but not all, of the [records](#) maintained in the system or by the project to be exempted from the [Privacy Act](#) through the [NPRM/Final Rule](#) process.

<p><b><a href="#">Section 4.1(a)</a></b> Please check all of the following that are true:</p> <ol style="list-style-type: none"><li>1. <input type="checkbox"/> None of the <a href="#">PII</a> maintained in the system or by the project is part of a <a href="#">Privacy Act system of records</a>;</li><li>2. <input type="checkbox"/> All of the <a href="#">PII</a> maintained in the system or by the project is part of a <a href="#">system of records</a> and none of it is exempt from the <a href="#">Privacy Act</a> relevant and necessary requirement;</li><li>3. <input type="checkbox"/> All of the <a href="#">PII</a> maintained in the system or by the project is part of a <a href="#">system of records</a> and all of it is exempt from the <a href="#">Privacy Act</a> relevant and necessary requirement;</li><li>4. <input type="checkbox"/> Some, but not all, of the <a href="#">PII</a> maintained in the system or by the project is part of a <a href="#">system of records</a> and the records to which the <a href="#">Privacy Act</a> applies are exempt from the relevant and necessary requirement; and</li><li>5. <input checked="" type="checkbox"/> Some, but not all, of the <a href="#">PII</a> maintained in the system or by the project is part of a <a href="#">system of records</a> and none of the records to which the <a href="#">Privacy Act</a> applies are exempt from the relevant and necessary requirement.</li></ol>
<p><b><a href="#">Section 4.1(b)</a></b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A With respect to <a href="#">PII</a> maintained in the system or by the project that is subject to the <a href="#">Privacy Act’s</a> relevant and necessary requirement, was an assessment conducted prior to collection (e.g., during <a href="#">Paperwork Reduction Act</a> analysis) to determine which <a href="#">PII</a> types (see <a href="#">Section 4.2</a> below) were relevant and necessary to meet the system’s or project’s mission requirements?</p>
<p><b><a href="#">Section 4.1(c)</a></b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A With respect to <a href="#">PII</a> maintained in the system or by the project that is subject to the <a href="#">Privacy Act’s</a> relevant and necessary requirement, is the <a href="#">PII</a> limited to only that which is relevant and necessary to meet the system’s or project’s mission requirements?</p>
<p><b><a href="#">Section 4.1(d)</a></b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No With respect to <a href="#">PII</a> maintained in the system or by the project that is subject to the <a href="#">Privacy Act’s</a> relevant and necessary requirement, is there a process to continuously reevaluate and ensure that the <a href="#">PII</a> remains relevant and necessary?</p>
<p><i>Explanation for Answers in Sections 4.1(a) thru 4.1(d):</i> Information processed by the Website that is subject to the Privacy Act is not exempt from the relevant and necessary requirements of the Privacy Act.</p> <p>Information subject to the Privacy Act is limited to:</p>



- Information necessary to administer the Website. This information is generally collected directly from OFR employees or contractors, or is provided by Treasury’s HRConnect system.
- Information about OFR employees which appears in biographies or work products on the Website, and is generally collected directly from OFR employees.

Each of these are discussed in more detail below.

For data collected to grant OFR employees, contractors, and authorized users access and permissions to administer the Website, such information is governed in accordance with the Treasury System of Records Notice, [Treasury.015 – General Information Technology Access Account Records \(GITAARS\)](#). This information is limited to that which is necessary to grant access to and use of OFR information technology resources. OFR regularly reviews its user access processes and collections of PII to ensure the appropriate information is captured to ensure access to and security of OFR systems.

For biographical information such as the names, titles, email addresses, or information about the educational and professional qualifications of OFR personnel included in biographies on the Website, such information is collected directly from OFR employees to whom the biographies pertain. In general, such information is duplicative of information contained in Treasury’s HRConnect System and is accounted for in the Treasury System of Records Notice, [Treasury .001 – Treasury Payroll and Personnel System](#) and OPM/GOVT-1, General Personnel Records. Information is limited to that which is provided by the subject of the biography, or to what is necessary to facilitate communication with the public (title, email).

Additionally, some PII which is subject to the Privacy Act may appear in OFR work products posted to the Website – including biographical information about OFR employees and others who author such work products. As is the case with biographies, all such information or PII is voluntarily provided by the individual and limited to information that is necessary and relevant given the nature of the work product, or to facilitate communication. Individuals are either advised prior to the actual collection of the biographical information, or are advised based on the nature of their work responsibilities that such information may be made public and posted to the Website. As outlined above, this information duplicates information contained in existing personnel records subject to the Privacy Act, or, in the case of non-OFR personnel, is covered by the Treasury System of Records Notice, [Treasury.017 – Correspondence and Contact Information](#). Please see Section 6.1(b) for a further discussion of the related Systems of Records for this information.

Information that is necessary to sign up to receive OFR email updates based on an individual’s needs and interests, and to manage those email subscription preferences (GovDelivery) is **not** subject to the Privacy Act since the OFR does not retrieve such information by personal identifier. That said, the OFR reviewed the data elements proposed for managing email subscriptions and determined that only an email address was necessary to facilitate email subscriptions – other data elements proposed for collection, such as a name, were eliminated. Website visitors who sign up for email alerts also have the option of creating an account password to protect their subscription preferences; however the collection of this information is not required and is only for use by individuals in managing their subscription preferences. Exhibit F, High-Level Overview of OFR Email Subscription Management through GovDelivery, discusses OFR’s use of this service in more detail.

A complete list of PII collected or processed by the Website, including that subject to the Privacy Act, can be found in Section 5.1 of this PCLIA.

The OFR will review the collection of all information processed by the Website in conjunction with reviews of this PCLIA to ensure all PII collected remains relevant and necessary going forward.

## Section 4.2: PII and/or information types or groupings

To perform their various missions, federal agencies must necessarily collect various types of information. The checked boxes below represent the types of information maintained in the system or by the project. Information identified below is used by the system or project to fulfill the purpose stated in [Section 3.3](#) – Authority to Collect.

<b>Biographical/General Information Regarding Individuals</b>		
<input checked="" type="checkbox"/> Name	<input type="checkbox"/> Gender	<input checked="" type="checkbox"/> Group/Organization Membership* <i>* To include information included on OFR researcher or leadership biography pages; information contained in OFR white papers and related work products where the OFR researcher or the co-author or researcher provides such information.</i>
<input type="checkbox"/> Birth Date	<input type="checkbox"/> Race/Ethnicity	<input type="checkbox"/> Military Service Information
<input type="checkbox"/> Home Physical Mailing Address	<input type="checkbox"/> Citizenship	<input type="checkbox"/> Marital Status
<input type="checkbox"/> Personal Cell Number	<input type="checkbox"/> Nationality	<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Personal Home Phone or Fax Number	<input type="checkbox"/> Country of Birth	<input type="checkbox"/> Spouse Information
<input checked="" type="checkbox"/> Personal e-mail address	<input type="checkbox"/> City or County of Birth	<input type="checkbox"/> Children Information
<input type="checkbox"/> Alias (including nickname)	<input type="checkbox"/> Immigration Status	<input type="checkbox"/> Information about other relatives.
<input checked="" type="checkbox"/> Education Information* <i>*To include information included on OFR researcher or leadership biography pages; information contained in OFR white papers and related work products where the OFR researcher or the co-author or researcher provides such information.</i>	<input type="checkbox"/> Religion/Religious Preference	<input type="checkbox"/> References or other information about an individual's friends, associates or acquaintances.
<input type="checkbox"/> Personal Financial Information (including loan information)	<input type="checkbox"/> Passport Information	<input type="checkbox"/> Global Positioning System (GPS)/Location Data
<input type="checkbox"/> Sexual Orientation	<input checked="" type="checkbox"/> User names, avatars etc.	<input type="checkbox"/> Secure Digital (SD) Card or Other Data stored on a card or other technology
<input type="checkbox"/> Cell tower records (e.g., logs, user location, time etc.)	<input checked="" type="checkbox"/> Contact lists and directories* <i>* OFR researcher and leadership</i>	<input checked="" type="checkbox"/> Other (please describe): <u>General correspondence received through email via the "Contact Us"</u>

	<i>biography pages, which include position/title and email address.</i>	<u>functionality.</u>
<input type="checkbox"/> Network communications data	<input type="checkbox"/> Device settings or preferences (e.g., security level, sharing options, ringtones).	<input type="checkbox"/> Other (please describe): _____

### Identifying Numbers Assigned to Individuals

<input type="checkbox"/> Full Social Security number	<input type="checkbox"/> Personal Bank Account Number
<input type="checkbox"/> Truncated Social Security Number (e.g., last 4 digits)	<input type="checkbox"/> Health Plan Beneficiary Number
<input type="checkbox"/> Employee Identification Number	<input type="checkbox"/> Credit Card Number
<input type="checkbox"/> Taxpayer Identification Number	<input type="checkbox"/> Patient ID Number
<input type="checkbox"/> File/Case ID Number	<input type="checkbox"/> Vehicle Identification Number
<input type="checkbox"/> Alien Registration Number	<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Personal device identifiers or serial numbers	<input type="checkbox"/> License Plate Number
<input checked="" type="checkbox"/> Internet Protocol (IP) Address (where known to belong to an individual or unknown whether the IP address belongs to an individual or organization)	<input type="checkbox"/> Professional License Number
<input type="checkbox"/> Other (please describe): _____	

### Medical/Emergency Information Regarding Individuals

<input type="checkbox"/> Medical/Health Information	<input type="checkbox"/> Worker's Compensation Act Information	<input type="checkbox"/> Patient ID Number
<input type="checkbox"/> Mental Health Information	<input type="checkbox"/> Disability Information	<input type="checkbox"/> Emergency Contact Information (e.g., a third party to contact in case of emergency)
<input type="checkbox"/> Other (please describe): _____		

### Biometrics/Distinguishing Features/Characteristics of Individuals

<input type="checkbox"/> Physical description/ characteristics (e.g., hair, eye color, weight, height, sex, gender etc.)	<input checked="" type="checkbox"/> Signatures* <i>* Includes signatures of OFR employees included in official compliance, policy, or similar documents cleared for public consumption and included on the Website.</i>	<input type="checkbox"/> Vascular scans
<input type="checkbox"/> Fingerprints	<input checked="" type="checkbox"/> Photos * <i>* To include information included on OFR researcher and leadership biography pages and OFR employees and contractors and individuals who attend OFR-sponsored events.</i>	<input type="checkbox"/> Retina/Iris Scans

<input type="checkbox"/> Palm prints	<input checked="" type="checkbox"/> Video* <i>* To include recordings of presentations or speeches made by OFR employees or officials, or events in which OFR employees or officials are participants (e.g. congressional hearings, conference presentations, news interviews, internal presentations, etc.)</i>	<input type="checkbox"/> Dental Profile
<input type="checkbox"/> Voice audio recording	<input type="checkbox"/> Scars, marks, tattoos	<input type="checkbox"/> DNA Sample or Profile
<input type="checkbox"/> Other (please describe):	<input type="checkbox"/> Other (please describe):	<input type="checkbox"/> Other (please describe):

Specific Information/File Types That Include Information Regarding Individuals		
<input type="checkbox"/> Taxpayer Information/Tax Return Information	<input type="checkbox"/> Law Enforcement Information	<input type="checkbox"/> Security Clearance Information
<input type="checkbox"/> Civil/Criminal History Information/Police Records	<input type="checkbox"/> National Security/Classified Information	<input type="checkbox"/> Bank Secrecy Act Information
<input type="checkbox"/> Protected Information (as defined in Treasury Directive 25-10)	<input type="checkbox"/> Case files	<input type="checkbox"/> Personnel Files
<input type="checkbox"/> Information provided under a confidentiality agreement	<input type="checkbox"/> Information subject to the terms of an international or other agreement	<input type="checkbox"/> Other (please describe): _____

Audit Log and Security Monitoring Information		
<input checked="" type="checkbox"/> User ID assigned to a user of Treasury IT	<input checked="" type="checkbox"/> Date and time an individual accesses a facility, system, or other IT	<input checked="" type="checkbox"/> Files accessed by a user of Treasury IT
<input checked="" type="checkbox"/> Passwords generated by a user of Treasury IT	<input type="checkbox"/> Internet or other queries run by a user of Treasury IT	<input checked="" type="checkbox"/> Contents of files accessed by a user of Treasury IT
<input type="checkbox"/> Video of individuals derived from security cameras	<input type="checkbox"/> Biometric information used to access Treasury facilities or IT	<input type="checkbox"/> Public Key Information.
<input type="checkbox"/> Information revealing an individual's presence in a particular location as derived from security token/key fob, employee identification card scanners or other IT or devices	<input type="checkbox"/> Still photos of individuals derived from security cameras.	<input type="checkbox"/> Other (please describe):

Other	
<input checked="" type="checkbox"/> Other (please describe: <u>Anonymized browsing</u> )	<input type="checkbox"/> Other (please describe: _____)

<u>information about visitors to the Website provided through OFR's use of the GSA Digital Analytics Program (Google Analytics).</u>	
<input type="checkbox"/> Other (please describe: _____)	<input type="checkbox"/> Other (please describe: _____)

**Section 4.3: Sources of information and the method and manner of collection**

Public/Website visitors	OFR Employees with duties related to Website Management and Content Administration	OFR Researchers and Leadership (Biography Pages)	Other OFR Employees and Representatives
<p><b>Specific PII identified in Section 4.2 that was acquired from this source:</b></p> <p>Email address;</p> <p>OFR email subscription preferences;</p> <p>Username/password combinations for users to manage their subscription preferences through GovDelivery (optional)</p> <p>Automatically collected log information about use of the GovDelivery site and the Website to include:</p> <ul style="list-style-type: none"> <li>- IP address;</li> <li>- Pages accessed and requested;</li> <li>- Time and date of visit/access;</li> <li>- Browser used; and</li> <li>- Domain of the visitor</li> </ul> <p>Automatically collected information through the Website's use of GSA Digital Analytics (GoogleAnalytics), to include de-identified, aggregate statistical information about use of the Website, including search terms entered in the "Bing"</p>	<p><b>Specific PII identified in Section 4.2 that was acquired from this source:</b></p> <p>Username/password combinations for use by authorized OFR staff to manage subscription lists.</p> <p>Name and position within the OFR of employees assigned to route, respond, or vet correspondence received via email through the "Contact Us" function on the Website.</p> <p>Username/password and related authorization information for OFR staff authorized to manage non-public portions of the Website, including the Content Management System.</p>	<p><b>Specific PII identified in Section 4.2 that was acquired from this source:</b></p> <p>Name</p> <p>Title/Position</p> <p>Business Email Address</p> <p>Voluntarily provided information about educational and professional qualifications, research interests, etc.</p>	<p><b>Specific PII identified in Section 4.2 that was acquired from this source:</b></p> <p>Name</p> <p>Group</p> <p>Organization/Membership</p> <p>Contact Information (if provided)</p> <p>Signature</p> <p>Photo</p>



search box that appears on the website.  General correspondence received via email through the “Contact Us” function on the website. In some cases, this may include limited PII such as name of the individual submitting the correspondence.			
<b>Manner in which information is acquired from source by the Treasury project/system: (select all that apply):</b>	<b>Manner in which information is acquired from source by the Treasury project/system: (select all that apply):</b>	<b>Manner in which information is acquired from source by the Treasury project/system: (select all that apply):</b>	<b>Manner in which information is acquired from source by the Treasury project/system: (select all that apply):</b>
<input type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group  Please identify the form name (or description) and/or number (e.g., OMB Control Number): _____	<input type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group  Please identify the form name (or description) and/or number (e.g., OMB Control Number): _____	<input type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group  Please identify the form name (or description) and/or number (e.g., OMB Control Number): _____	<input type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group  Please identify the form name (or description) and/or number (e.g., OMB Control Number): _____
<input type="checkbox"/> Received in paper format other than a form.	<input type="checkbox"/> Received in paper format other than a form.	<input type="checkbox"/> Received in paper format other than a form.	<input checked="" type="checkbox"/> Received in paper format other than a form.
<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.	<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.	<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.	<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.
<input checked="" type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet ( <i>Through the OFR’s use of GovDelivery service</i> )	<input type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet	<input type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet	<input type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet
<input checked="" type="checkbox"/> Email ( <i>Through the OFR’s “Contact Us” email function.</i> )	<input type="checkbox"/> Email	<input type="checkbox"/> Email	<input type="checkbox"/> Email
<input type="checkbox"/> Scanned documents uploaded to the system.	<input type="checkbox"/> Scanned documents uploaded to the system.	<input type="checkbox"/> Scanned documents uploaded to the system.	<input checked="" type="checkbox"/> Scanned documents uploaded to the system.
<input type="checkbox"/> Bulk transfer	<input type="checkbox"/> Bulk transfer	<input type="checkbox"/> Bulk transfer	<input type="checkbox"/> Bulk transfer
<input type="checkbox"/> Extracted from	<input type="checkbox"/> Extracted from particular	<input type="checkbox"/> Extracted from particular	<input type="checkbox"/> Extracted from particular

particular technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).	technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).	technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).	technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).
<input type="checkbox"/> Fax	<input type="checkbox"/> Fax	<input type="checkbox"/> Fax	<input type="checkbox"/> Fax
<input type="checkbox"/> Extracted from notes of a phone interview or face to face contact	<input type="checkbox"/> Extracted from notes of a phone interview or face to face contact	<input type="checkbox"/> Extracted from notes of a phone interview or face to face contact	<input type="checkbox"/> Extracted from notes of a phone interview or face to face contact
<input checked="" type="checkbox"/> Other: Please describe: Through the Website’s “Contact Us” email function or through the OFR’s GovDelivery email subscription sign-up page.	<input checked="" type="checkbox"/> Other: Please describe: As part of licensing agreement with GovDelivery, authorized OFR users are provided a limited number of accounts to access GovDelivery to manage subscription lists and are provided a username/password combo by the GovDelivery system to log in.  Further, when the OFR receives email inquiries through the “Contact Us” function on the Website, OFR staff may be assigned to route, respond to, or vet responses to those inquiries. In such case, information about relevant OFR employees would be pulled from internal HR data sources.	<input checked="" type="checkbox"/> Other: Please describe: Biographies are drafted by individual OFR employees in accordance with a specified template (text/character limit) and submitted to OFR leadership and External Affairs staff for review and approval.	<input checked="" type="checkbox"/> Other: Please describe: The Website shares publicly available information in the form of OFR white papers, studies, press releases, public meeting agendas, policy statements, and public-consumption data sets. While these products do not generally contain PII, in some cases PII may be included, including names and positions, educational or related biographical information about employees of the OFR or Treasury (who serve as authors, public representatives, etc.) in their professional capacity, or of members of the OFR’s Financial Research Advisory Committee, or other public figures or officials associated with OFR initiatives. The website may also make available documents containing photos and signatures of such individuals, or videos of OFR or Treasury officials in their official capacity.
<input type="checkbox"/> Other: Please describe: _____	<input type="checkbox"/> Other: Please describe: _____	<input type="checkbox"/> Other: Please describe: _____	<input type="checkbox"/> Other: Please describe: _____

**Section 4.4: Privacy and/or civil liberties risks related to collection**

**Notice of Authority, Principal Uses, Routine Uses and Effect of not Providing Information**

When federal agencies use a form to obtain information from an individual that will be maintained in a system of records, they must inform the individual of the following: “(A) the authority (whether granted by statute, or by executive order of the President) which authorizes the solicitation of the information and whether disclosure of such information is mandatory or voluntary; (B) the principal purpose or purposes for which the information is intended to be used; (C) the routine uses which may be made of the information as published pursuant to paragraph (4)(D) of this subsection; and (D) the effects on him, if any, of not providing all or any part of the requested information.” 5 U.S.C. § 522a(e)(3).

**Section 4.4(a)**  Yes  No Is any of the PII maintained in the system or by the project collected directly from an individual?

**Section 4.4(b)**  Yes  No  N/A Was the information collected from the individual using a form (paper or electronic)?

**Section 4.4(c)**  Yes  No  N/A Was the individual notified (e.g., on the form in which the PII was collected or on a separate form that can be retained by the individual, in a website policy) about the following at the point where the information was collected (e.g., in a form or on a website).

- The authority (whether granted by statute, or by Executive order of the President) which authorizes the solicitation of the information.
- Whether disclosure of such information is mandatory or voluntary.
- The principal purpose or purposes for which the information is intended to be used.
- The individuals or organizations outside of Treasury with whom the information may be/ will be shared.
- The effects on the individual, if any, if they decide not to provide all or any part of the requested information.

*Explanation for Answers in Sections 4.4(a) thru 4.4(c):* No form is used to collect information from individual users of the Website. However, individuals who choose to sign up to receive OFR email alerts and voluntarily provide their email address, or who choose to use the “Contact Us” link or email links for individual researchers or members of the leadership team on biography pages, are provided notice of the collection and use of this information through the privacy policy available on the Website. The [OFR Website Privacy Policy](#) includes a reference and link to the use of GovDelivery for email subscriptions and GovDelivery’s privacy policies, as well as a discussion of what PII is collected by the Website, how that information is used and secured, and the choices available to Website users with regard to the collection and use of their PII.

Individuals (including employees of the OFR and those who serve as authors or public representatives) may voluntarily provide a very limited amount of biographical information such as name, title, degree, email address, or a very brief synopsis of professional qualifications for inclusion in certain OFR work product which will be posted to the Website. For example, such biographical information may be: (i) included in a footnote to a working paper, report, or written analysis to attribute such work product to the author and to facilitate public feedback; (ii) posted as a brief biographical synopsis to advise the public of the professional background and qualifications of OFR senior level executives or public representatives such as FRAC members; or (iii) included in a press release or brief bio which is posted to the site.

All such biographical information or PII is voluntarily provided by the individual and limited to information that is necessary and relevant given the nature of the work product or to facilitate communication with an individual researcher or member of OFR’s leadership team. Individuals are either advised prior to the actual collection of the biographical information or are advised based on the nature of their work responsibilities that such information may be made public and posted to the Website. The biographical information is reviewed and cleared in accordance with OFR internal clearance procedures prior to being posted on the Website.

## Use of Social Security Numbers

Social Security numbers (“SSN”) are commonly used by identity thieves to commit fraudulent acts against individuals. Therefore, as a matter of policy, federal agencies are required to eliminate the use of SSNs (subject to certain exceptions).

In addition, the [Privacy Act](#), as amended, provides that: “It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual’s refusal to disclose his social security account number.” Pub. L. No. 93–579, § 7. This provision does not apply to: (1) any disclosure required by federal statute; or (2) any disclosure of an SSN to any federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, if such disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. See Pub. L. 93–579, § 7(a)(2)(A)-(B).

**Section 4.4(d)**  Yes  No  N/A Does the system or project maintain SSNs?

**Section 4.4(e)**  Yes  No  N/A Were steps taken to explore alternatives to the use of SSNs as a personal identifier in the system or project and were any resulting actions taken to eliminate unnecessary uses?

**Section 4.4(f)**  Yes  No  N/A Will individuals be denied any right, benefit, or privilege provided by law because of such individual's refusal to disclose their SSN?

- SSN disclosure is required by federal statute;
- the SSN is disclosed to any federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, and disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual; or
- when the information is collected, individuals are given notice whether that disclosure is mandatory or voluntary, by what statutory or other authority such number is solicited, and what uses will be made of it.

*Explanation for Answers in Sections 4.4(d) thru 4.4(f):* The Website does not collect, use, retain, or request Social Security numbers.

### First Amendment Activities

The [Privacy Act](#) requires that federal agencies “maintain no record describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual about whom the record is maintained or unless pertinent to and within the scope of an authorized law enforcement activity.” 5 U.S.C. § 552a (e)(7).

**Section 4.4(g)**  Yes  No Does the system or project maintain any information describing how any individual exercises their rights guaranteed by the First Amendment?

- The individual about whom the information was collected or maintained expressly authorizes its collection/maintenance.
- The information maintained is pertinent to and within the scope of an authorized law enforcement activity.
- There is a statute that expressly authorizes its collection.

*Explanation for Answers in Section 4.4(g):* The Website does not maintain records describing how any individual exercises rights guaranteed by the First Amendment.

## **Section 5.0: Maintenance, use, and sharing of the information**

The following sections require a clear description of the system’s or project’s uses of information.

### **Section 5.1: Describe how and why the system or project uses the information it collects and maintains**

Please describe all of the uses of the information types and groupings collected and maintained by the system or project (see [Section 4.2](#)), including a discussion of why the information is used for this purpose and how it relates to the mission of the bureau or office that owns the system.

The purpose of the Website is to provide information to the public about the OFR’s mission, goals, and work products, and to serve as a communication and engagement platform for parties interested in learning about the OFR and its mission and projects.



The Website collects:

- 1) Information through the OFR's use of GovDelivery for email subscriptions:
  - Email addresses of individuals who elect to receive email communications from the OFR through the Website.
  - User subscription preferences (users may request emails targeted to their specific interests). Username and password combination for the user to protect their subscription preferences (optional).
  - GovDelivery administrator account usernames and passwords for authorized access by designated Treasury Website support personnel to provided email addresses and subscription preferences to facilitate distribution of requested email notifications.
- 2) Information automatically collected by GovDelivery for security purposes and to allow visitors to communicate with the Website:
  - IP address.
  - Pages accessed and pages requested.
  - Time and date of visit/access.
- 3) Email addresses and general correspondence of individuals who use the Website's "Contact Us" or similar functions. Such correspondence may include unsolicited PII, such as a name of the individual submitting the correspondence.
- 4) Information about OFR employees, including name and position with OFR assigned to manage correspondence received via email through the Website's "Contact Us" function.
- 5) Information about OFR employees and contractors used to grant access to and permissions associated with non-public portions of the Website for the purpose of managing the site and its content.
- 6) Information about OFR employees involved in research or in leadership positions in the form of biographies to include:
  - Name
  - Title
  - Business email address
  - Areas of research interest
  - Limited educational or employment background as provided by the researcher or OFR official in their biography.
- 7) Automatically collected log information about Website use that is used to secure the site and enhance usability, including de-identified information collected through the OFR's use of GSA Digital Analytics (Google Analytics) on the Website:
  - Internet domain of the visitor.
  - IP address of the visitor (anonymized)
  - Browser used by the visitor to access the Website.
  - Date and time of access, page(s) visited, and length of visit.
  - Search terms entered in the "Bing" search box which appears on the Website.

Additionally, the Website may share publicly available information in the form of OFR white papers, studies, press releases, public meeting agendas, policy statements, and non-proprietary, non-confidential data sets. While these products do not generally contain PII, there are instances in which some PII may be included, such as names and positions, educational or related biographical information about employees of the OFR or Treasury (who serve as authors, public representatives,

etc.) in their professional capacity, or of members of the OFR's Financial Research Advisory Committee, or other public figures or officials associated with OFR initiatives. The website may also make available documents containing photos and signatures of such individuals, or videos of OFR or Treasury officials in their official capacity. For example, the OFR may use the Website to make a research paper, authored by an OFR employee, available for public consumption and comment. Included in the paper may be a short biography of the OFR employee responsible for the research and authoring. This bio could include the name and position of the OFR employee, as well as limited biographical information (at the employee's discretion) such as their educational background and a professional photograph of the researcher. In another scenario, the OFR may post a video of public events that the OFR sponsors or participates in, where OFR employees speak in their professional capacity. Such videos would include images of OFR employees, and may also include information such as their name or other biographic information that they disclose in the course of speaking. Finally, the OFR may release annual reports on its website, which contain a message from the OFR Director, as well as his photograph and signature.

The collection and use of email addresses, subscription preferences, and general inquiries or correspondence for those who provide such information through GovDelivery or the "Contact Us" function on the Website is consistent with the OFR's mission because it allows the OFR to disseminate information about the OFR, and to respond to inquiries. With regard to correspondence submitted through the "Contact Us" email function, the OFR also uses this information to measure and improve its response performance. Likewise, information collected to secure and enhance the usability of the Website is consistent with the OFR's mission because it improves the OFR's continued engagement with the public through the Website. Finally, information shared through the Website in the form of white papers, research studies, etc. is consistent with the OFR's mission because it helps the OFR continue "improving the quality, transparency, and accessibility of financial data and information," and to facilitate communication with authors of materials appearing on the Website as discussed in Sections 4.1(d) and 4.4(c) of this PCLIA.

### Collecting Information Directly from the Individual When Using it to Make Adverse Determinations About Them

The [Privacy Act](#) requires that federal agencies "collect information to the greatest extent practicable directly from the subject individual when the information may result in adverse determinations about an individual's rights, benefits, and privileges under Federal programs." See 5 U.S.C. § 552a(e)(2).

**Section 5.1(a)**  Yes  No Is it possible that the information maintained in the system or by the project may be used by Treasury to make an adverse determination about an individual's rights, benefits, and privileges under Federal programs (e.g., decisions about whether the individual will receive a financial benefit, get a clearance or access to a Treasury facility, obtain employment with Treasury, etc.)?

**Section 5.1(b)**  Yes  No Is it possible that Treasury will share information maintained in the system or by the project with a third party external to the Department that will use the information to make an adverse determination about an individual's rights, benefits, and privileges under Federal programs?

**Section 5.1(c)**  Yes  No  N/A If information could potentially be used to make an adverse determination about an individual's rights, benefits, and privileges under federal

programs, does the system or project collect information (to the greatest extent practicable) directly from the individual?

*Explanation for Answers in Sections 5.1(a) thru 5.1(c):* The Website does not use information collected or maintained by the system to make an adverse determination about an individual's rights, benefits, or privileges under federal programs.

## Data Mining

As required by Section 804 of the [Implementing the 9/11 Commission Recommendations Act of 2007](#) ("9-11 Commission Act"), Treasury reports annually to Congress on its data mining activities. For a comprehensive overview of Treasury's data mining activities, please review the Department's Annual Privacy reports available at: <http://www.treasury.gov/privacy/annual-reports>.

**Section 5.1(d)**  Yes  No Is information maintained in the system or by the project used to conduct "data-mining" activities as that term is defined in the [Implementing the 9-11 Commission Act](#)?

*Explanation for Answer in Section 5.1(d):* The OFR does not use the Website information to conduct data-mining activities.

## Section 5.2: Ensuring accuracy, completeness, and timeliness of information collected, maintained, and shared

### Exemption from Accuracy, Relevance, Timeliness, and Completeness Requirements

The [Privacy Act](#) requires that federal agencies "maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination." 5 U.S.C. § 552a(e)(5). If a particular [system of records](#) meets certain requirements (including the [NPRM](#) process discussed above), an agency may exempt the [system of records](#) (or a portion of the records) from this requirement.

**Section 5.2(a)**  Yes  No Is all or any portion of the information maintained in the system or by the project (a) part of a [system of records](#) and (b) exempt from the accuracy, relevance, timeliness, and completeness requirements in sections (e)(5) of the [Privacy Act](#)?

*Explanation for Answer in Section 5.2(a):* Information on the Website that is subject to the Privacy Act is not exempt from the timeliness and completeness requirements of section (e)(5) of the Privacy Act.

## Computer Matching

The Computer Matching and Privacy Protection Act of 1988 amended the [Privacy Act](#) for the purpose of imposing additional requirements when [Privacy Act systems of records](#) are used in computer matching programs.

Pursuant to the [Privacy Act](#), as amended, there are two distinct types of matching programs. The first type of matching program involves the computerized comparison of two or more automated federal

personnel or payroll [systems of records](#) or a system of federal personnel or payroll records with non-federal records. This type of matching program may be conducted for any purpose. The second type of matching program involves the computerized comparison of two or more automated [systems of records](#) or a [system of records](#) with non-federal records. The purpose of this type of matching program must be for the purpose of eligibility determinations or compliance requirements for applicants, recipients, beneficiaries, participants, or providers of services for payments or in-kind assistance under federal benefit programs, or recouping payments or delinquent debts under such federal benefit programs. See 5 U.S.C. § 522a(a)(8).

Matching programs must be conducted pursuant to a matching agreement between the source and recipient agencies. The matching agreement describes the purpose and procedures of the matching and establishes protections for matching records.

**Section 5.2(b)**  Yes  No Is any of the information maintained in the system or by the project (a) part of a [system of records](#) and (b) used as part of a matching program?

**Section 5.2(c)**  Yes  No  N/A Is there a matching agreement in place that contains the information required by Section (o) of the [Privacy Act](#)?

**Section 5.2(d)**  Yes  No  N/A Are assessments made regarding the accuracy of the records that will be used in the matching program? See 5 U.S.C. § 552a(o)(J).

**Section 5.2(e)**  Yes  No  N/A Does the bureau or office that owns the system or project independently verify the information, provide the individual notice and an opportunity to contest the findings, or obtain Data Integrity Board approval in accordance with Section (p) of the [Privacy Act](#) before taking adverse action against the individual?

*Explanation for Answers in Sections 5.2(b) thru 5.2(e):* Information maintained on the Website that is subject to the Privacy Act is not subject to or part of a matching program.

### Ensuring Fairness in Making Adverse Determinations About Individuals

Federal agencies are required to “maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.” 5 U.S.C. § 552a(e)(5). This requirement also applies when merging records from two or more sources where the merged records are used by the agency to make any determination about any individual.

**Section 5.2(f)**  Yes  No  N/A With respect to the information maintained in the system or by the project, are steps taken to ensure all information used to make a determination about an individual is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination?

*Explanation for Answer in Section 5.2(f):* Information collected and maintained through the Website is not used to make determinations or decisions about individuals.

### Merging Information About Individuals

**Section 5.2(g)**  Yes  No Is information maintained in the system or by the project merged with electronic or non-electronic information from internal or external sources (e.g.,



other files or systems)?

**Section 5.2(h)**  Yes  No  N/A Once merged, is the information used in making determinations about individuals (e.g., decisions about whether the individual will receive a financial benefit or payment, get a clearance or access to a Treasury facility, obtain employment with Treasury, etc.)?

**Section 5.2(i)**  Yes  No  N/A Are there documented policies or procedures for how information is merged?

**Section 5.2(j)**  Yes  No  N/A Do the documented policies or procedures address how to proceed when not all of the information being merged matches a particular individual (i.e., partial matches)?

**Section 5.2(k)**  Yes  No  N/A If information maintained in the system or by the project is used to make a determination about an individual, are steps taken to ensure the accuracy, relevance, timeliness, and completeness of the information as is reasonably necessary to assure fairness to the individual?

*Explanation for Answers in Sections 5.2(g) thru 5.2(k):* The system does not merge information about individuals from divergent sources.

### **Policies and Standard Operating Procedures or Technical Solutions Designed to Ensure Information Accuracy, Completeness, and Timeliness**

**Section 5.2(l)**  Yes  No  N/A If information maintained in the system or by the project is used to make any determination about an individual (regardless of if it is an exempt system of records), are there documented policies or standard operating procedures for the system or project that address the accuracy, completeness, and timeliness of the information?

**Section 5.2(m)**  Yes  No Does the system or project use any software or other technical solutions designed to improve the accuracy, completeness, and timeliness of the information used to make an adverse determination about an individual's rights, benefits, and/or privileges (regardless of if it is an exempt system of records)?

*Explanation for Answers in Sections 5.2(l) thru 5.2(m):* Information collected and used by the Website is not used to make a determination or decision about an individual.

### **Accuracy, Completeness, and Timeliness of Information Received from the Source**

**Section 5.2(n)**  Yes  No Did the bureau or office receive any guarantee, assurance, or other information from any information source(s) regarding the accuracy, relevance, timeliness and completeness of the information maintained in the system or by the project?



*Explanation for Answer in Section 5.2(n):* While the OFR does not receive explicit assurances of the accuracy, relevance, timeliness, and completion of information received through the Website, individuals who elect to receive email updates through the Website are responsible for inputting their email address and subscription preferences through GovDelivery, and may change, amend, or otherwise update those email preferences as necessary. As such, the information is considered accurate, timely, and complete. Moreover, the system can identify and remove certain invalid email addresses (either returned undeliverable or not in the correct format). Individuals who submit correspondence directly to the OFR through the “Contact Us” email function provide their own data, and this information is considered accurate, timely, and complete accordingly. Individuals may also use that same function (“Contact Us”) to supply a new email address or update their original inquiry or correspondence.

Finally, as discussed in Sections 4.1(d) and 4.4(c) of this PCLIA, individuals (including employees of the OFR or who serve as authors, public representatives, etc.) may voluntarily provide a very limited amount of biographical information such as name, title, degree, email address, or a very brief synopsis of professional qualifications for inclusion in certain OFR work product or individual biography pages that will be posted to the Website. All such biographical information or PII is voluntarily provided by the individual and limited to information that is necessary and relevant given the nature of the work product or in accordance with the biography page template. Individuals are either advised prior to the actual collection of the biographical information or are advised based on the nature of their work responsibilities that such information may be made public and posted to the Website. Consequently, the information is considered timely, accurate, and complete. The biographical information is reviewed and cleared in accordance with OFR internal clearance procedures prior to being posted on the Website.

**Disseminating Notice of Corrections of or Amendments to PII**

**Section 5.2(o)**  Yes  No  N/A Where feasible and appropriate, is there a process in place for disseminating corrections of or amendments to the PII maintained in the system or by the project to all internal and external information-sharing partners?

**Section 5.2(p)**  Yes  No  N/A Where feasible and appropriate, does the process for disseminating corrections or amendments include notifying the individual whose information is corrected or amended?

*Explanation for Answers in Sections 5.2(o) thru 5.2(p):* PII collected through the Website is only shared with external information sharing partners as required by law or with the explicit consent of impacted individuals. Users may input, update, or amend their email addresses and preferences as necessary through GovDelivery, or, for individuals who use the “Contact Us” function, may provide their email address to send their inquiry or correspondence for response by the OFR and may provide an updated email address or revised inquiry or correspondence as necessary. Further, biographies of OFR researchers and leadership are subject to regular review for accuracy.

**Section 5.3: Information sharing within the Department of the Treasury**

**Internal Information Sharing**

**Section 5.3(a)**  Yes  No Is PII maintained in the system or by the project shared with other Treasury bureaus or offices?

**Section 5.3(b)**  Yes  No Does the Treasury bureau or office that receives the PII limit access to those Treasury officers and employees who have a need for the PII in the

performance of their official duties (i.e., those who have a “need to know”)?

*Explanation for Answers in Sections 5.3(a) thru 5.3(b):* PII collected through the Website is not shared with other Treasury bureaus or offices except as required by law or with the explicit consent of impacted individuals.

**Memorandum of Understanding/Other Agreements Limiting Treasury’s Internal Use/Disclosure of PII**

**Section 5.3(c)**  Yes  No  N/A Is any of the PII maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency that provided the information to the Treasury or subject to an international agreement or treaty) that limits or places conditions on Treasury’s internal use, maintenance, handling or disclosure of the PII?

**Internal Information Sharing Chart**

Internal Recipient’s Name (e.g., bureau or office)	N/A			
Purpose of the Sharing	N/A			
<u>PII</u> Shared	N/A			
Applicable Statutory or Regulatory or Restrictions on Information Shared	N/A			
Applicable Restrictions Imposed by Agreement on Information Shared (e.g., by Treasury agreement with the party that provided the information to Treasury)	N/A			
Name and Description of MOU or Other Agreement Restricting Treasury’s Internal Use, Maintenance, Handling or Sharing of <u>PII</u> Received	N/A			
Method of <u>PII</u> Transfer (e.g., paper/oral disclosures/magnetic disk/portable device/email/fax/other (please describe if other))	N/A			

*Explanation for Responses in the Internal Information Sharing Chart:*  
 PII collected for or maintained by the Website is not subject to any agreements that limit the use or

sharing of the information. Further, PII collected through the Website is not shared either with external parties or with other Treasury offices or bureaus except as required by law or with the explicit consent of impacted individuals.

## **Section 5.4: Information sharing with external (i.e., outside Treasury) organizations and individuals**

### **External Information Sharing**

**Section 5.4(a)**  Yes  No Is PII maintained in the system or by the project shared with agencies, organizations, or individuals external to Treasury?

*Explanation for Answer in Section 5.4(a):* PII collected through the Website is not shared with external parties or with other Treasury bureaus or offices except as required by law or with the explicit consent of impacted individuals.

The Website may share publicly available information in the form of OFR white papers, studies, press releases, public meeting agendas, policy statements, and non-proprietary, non-confidential data sets through the Website. While these products do not generally contain PII, there are instances in which some PII may be included. For example: (i) names and positions of OFR employees who have authored an OFR research paper may be cited on the cover page of the paper; and (ii) members of the OFR's Financial Research Advisory Committee or Data Committee may be listed on the Website.

Finally, certain OFR employees involved in research or holding a senior leadership position may have limited PII published in the form of a biography. Participation is voluntary.

### **Accounting of Disclosures**

**Section 5.4(b)**  Yes  No  N/A With respect to records maintained in the system or by the project that are subject to the Privacy Act, do you maintain a paper or electronic log or other record of the date, nature, and purpose of each disclosure (not including intra-agency disclosures and FOIA disclosures) of a record to any person or to another agency (outside of Treasury) and the name and address of the person or agency to whom the disclosure is made? *See* 5 U.S.C. § 552a(c).

**Section 5.4(c)**  Yes  No  N/A If you do not keep a running tabulation of every disclosure at the time it is made, are you able to reconstruct an accurate and complete accounting of disclosures so as to be able to respond to Privacy Act requests in a timely fashion?

**Section 5.4(d)**  Yes  No  N/A With respect to records maintained in the system or by the project that are subject to the Privacy Act, do you retain the log or other record of the date, nature, and purpose of each disclosure, for at least five years or the life of the record, whichever is longer, after the disclosure for which the accounting is made?

**Section 5.4(e)**  Yes  No With respect to records maintained in the system or by the project that are subject to the Privacy Act, does your bureau or office exempt the system of records (as allowed by the Privacy Act in certain circumstances) from the requirement to make the accounting available to the individual named in the record?

**Section 5.4(f)**  Yes  No With respect to records maintained in the system or by the

project that are subject to the [Privacy Act](#), does your bureau or office exempt the [system of records](#) (as allowed by the [Privacy Act](#) in certain circumstances) from the requirement to inform any person or other agency about any correction or notation of dispute made by the agency of any [record](#) that has been disclosed to the person or agency if an accounting of the disclosure was made?

*Explanation for Answers in Sections 5.4(b) thru 5.4(f):* PII collected through the Website, including that which is subject to the Privacy Act, is not shared with external information sharing partners except as required by law, or with explicit consent of impacted individuals, and so no accounting of disclosures is maintained.

### Statutory or Regulatory Restrictions on Disclosure

**Section 5.4(g)**  Yes  No In addition to the [Privacy Act](#), are there any other statutory or regulatory restrictions (e.g., 26 U.S.C. § 6103 limits disclosure of tax returns and return information) on the sharing of any of the information or records maintained in the system or by the project?

*Explanation for Answer in Section 5.4(g):* No other restrictions exist on information collected and maintained through the Website.

### Memorandum of Understanding Related to External Sharing

**Section 5.4(h)**  Yes  No  N/A Does Treasury (including bureaus and offices) have an MOU, or any other type of agreement, with any external agencies, organizations, or individuals with which/whom it shares [PII](#) maintained in the system or by the project?

*Explanation for Answer in Section 5.4(h):* PII collected for or maintained by the Website is not subject to any agreement that limits the use or sharing of the information.

### Memorandum of Understanding Limiting Treasury's Use or Disclosure of PII

**Section 5.4(i)**  Yes  No  N/A Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency, an international agreement or treaty or contract with private vendor) that limits or places conditions on Treasury's internal use or external (i.e., outside Treasury) sharing of the [PII](#)?

*Explanation for Answer in Section 5.4(i):* PII collected for or maintained by the Website is not subject to any agreement that limits the use or sharing of the information. Furthermore, PII collected through the Website is not shared with external parties or with other Treasury bureaus or offices.

### Memorandum of Understanding Limiting External Party's Use or Disclosure of PII

**Section 5.4(j)**  Yes  No  N/A Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement in which Treasury limits or places conditions on an external party's use, maintenance, handling or disclosure of [PII](#) shared by Treasury?

*Explanation for Answer in Section 5.4(j):* PII collected for or maintained by the Website is not subject to any agreement that limits the use or sharing of the information. Furthermore, PII collected through the Website is not shared with external parties except as required by law or with the explicit consent of impacted individuals.



**External Information Sharing Chart**

<b>Section 5.4(k)</b> <input checked="" type="checkbox"/> N/A				
External Recipient's Name	N/A			
Purpose of the Sharing	N/A			
<u>PII</u> Shared	N/A			
Content of Applicable Routine Use/Citation to the <u>SORN</u>	N/A			
Applicable Statutory or Regulatory or Restrictions on Information Shared	N/A			
Name and Description of Relevant MOUs or Other Agreements Containing Sharing Restrictions Imposed on Treasury by an External Source or Providing/Originating Agency (including description of restrictions imposed on use, maintenance, and disclosure of <u>PII</u> )	N/A			
Name and Description of Relevant MOUs or Other Agreements Containing Restrictions Imposed by Treasury on External Sharing Partner (including description of restrictions imposed on use, maintenance, and disclosure of <u>PII</u> )	N/A			
Method(s) Used to Transfer <u>PII</u> (e.g., paper/oral disclosures/magnetic disk/portable device/email/fax/other) (please describe if other)	N/A			

**Obtaining Consent Prior to New Disclosures Not Included in the SORN**

**Section 5.4(l)**  Yes  No  N/A Is the individual's consent obtained, where feasible and appropriate, prior to any **new** disclosures of previously collected records in a system of records (those not expressly authorized by the Privacy Act or contained in the published SORN (e.g.,



in the routine uses))?

*Explanation for Answer in Section 5.4(l):* PII collected and maintained through the Website, including information subject to the Privacy Act, is not shared with or disclosed to external parties except as required by law, or with their explicit consent. In the event the OFR deems it necessary to share PII collected through the Website, such changes to internal OFR policy will be relayed to impacted individuals through updates to the [OFR Website Privacy Policy](#) and this PCLIA.

While there is a risk that individuals will not be able to provide consent to new disclosures, the risk is minimal because the OFR limits its collection of PII subject to the Privacy Act to email addresses and limited contact and biographical information, provided voluntarily, by OFR employees. Further, individuals may remove their email address from the OFR email subscription list at any time, and OFR staff participation in providing biographical information is voluntary.

## **Section 6.0: Legal compliance with federal information management requirements**

Responses to the questions below address the practical, policy and legal consequences of failing to comply with one or more of the following federal information management requirements (to the extent required) and how those risks were or are being mitigated: (1) the [Privacy Act System of Records Notice](#) requirement; (2) the [Paperwork Reduction Act](#); (3) the [Federal Records Act](#); (4) the [E-Gov Act](#) security requirements; and (5) [Section 508 of the Rehabilitation Act of 1973](#).

### **Section 6.1: Privacy Act System of Records Notice (SORN)**

For all collections of [PII](#) that meet certain requirements, the [Privacy Act](#) requires Treasury to publish a [SORN](#) in the *Federal Register*.

#### **System of Records**

**Section 6.1(a)**  Yes  No  N/A Does the system or project retrieve [records](#) about an individual using an identifying number, symbol, or other identifying particular assigned to the individual? (see items selected in [Section 4.2](#) above)

**Section 6.1(b)**  Yes  No  N/A Was a [SORN](#) published in the *Federal Register* for this [system of records](#)?

*Explanation for Answers in Sections 6.1(a) thru 6.1(b):* Email addresses and subscription preferences for individuals who sign up to receive OFR email alerts are subject to the Privacy Act and are accounted for in the Treasury System of Records Notice, [Treasury.015 – General Information Technology Access Account Records \(GITAARS\)](#).

The limited amount of biographical information about OFR personnel included in certain OFR work products or biographies posted to the Website is accounted for in the Office of Personnel Management (OPM) System of Records Notice, OPM/GOVT-1, General Personnel Records, [Treasury .001 – Treasury Payroll and Personnel System](#), and [Treasury.017 – Correspondence and Contact Information](#).

## Section 6.2: The Paperwork Reduction Act

The [PRA](#) requires OMB approval before a federal agency may collect standardized data from 10 or more respondents within a 12 month period. OMB requires agencies to conduct a PIA (a Treasury PCLIA) when initiating, consistent with the [PRA](#), a new electronic collection of personally identifiable information for 10 or more persons (excluding agencies, instrumentalities, or employees of the federal government).

### **Paperwork Reduction Act Compliance**

**Section 6.2(a)**  Yes  No Does the system or project maintain information obtained from individuals and organizations who are not federal personnel or an agency of the federal government (i.e., outside the federal government)?

**Section 6.2(b)**  Yes  No  N/A Does the project or system involve a new collection of information in identifiable form for 10 or more persons from outside the federal government?

**Section 6.2(c)**  Yes  No  N/A Did the project or system complete an Information Collection Request (“ICR”) and receive OMB approval?

*Explanation for Answers in Sections 6.2(a) thru 6.2(c):* Information collected by the Website is not subject to the requirements of the Paperwork Reduction Act in accordance with guidance issued by the [Office of Management and Budget \(OMB\), April 7, 2010](#).

## Section 6.3: Records Management - NARA/Federal Records Act Requirements

Records retention schedules determine the maximum amount of time necessary to retain information in order to meet the needs of the project or system. Information generally is either disposed of or sent to the [NARA](#) for permanent retention upon expiration of this period.

### **NARA Records Retention Requirements**

**Section 6.3(a)**  Yes  No Has the Archivist of the United States approved a retention schedule for the records maintained in the system or by the project?

**Section 6.3(b)**  Yes  No Do General Records Schedules (“GRS”) apply to the records maintained in the system or by the project?

**Section 6.3(c)**  Yes  No If the Archivist of the United States has not approved a retention schedule for the records maintained in the system or by the project and records are not covered by a GRS, has a draft retention schedule been developed for the records used in this project or system?

**Section 6.3(d)**  Yes  No Have all applicable Treasury officials approved a draft retention schedule for the records used in this project or system?

*Explanation for Answers in Sections 6.3(a) thru 6.3(d):* Records collected and maintained through the Website are securely retained and disposed of in accordance with the National Archives and

Records Administration’s General Records Schedule 24, section 6, “User Identification, Profiles, Authorizations, and Password Files.” Inactive records will be destroyed or deleted 6 years after the user account is terminated or password is altered, or when no longer needed for investigative or security purposes, whichever is later.

The limited amount of biographical information about OFR personnel included in certain OFR work products and biographies posted to the Website is managed per individual agency procedures and schedules in accordance with the National Archives and Records Administration records schedules, or in accordance with GRS-1 or GRS 20.

### **Section 6.4: E-Government Act/NIST Compliance**

The completion of Federal Information Security Management Act (“FISMA”) Security Assessment & Authorization process is required before a federal information system may receive Authority to Operate (“ATO”). Different security requirements apply to National Security Systems.

#### **Federal Information System Subject to FISMA Security Assessment and Authorization**

**Section 6.4(a)**  Yes  No  N/A Is the system a federal information system subject to FISMA requirements?

**Section 6.4(b)**  Yes  No  N/A Has the system or project, if applicable, undergone a Security Assessment and Authorization and received Authority to Operate?

*Explanation for Answers in Sections 6.4(a) thru 6.4(b):* The Website completed the Security Assessment and Authorization process and received Authority to Operate as of January 30, 2015.

#### **Access Controls and Security Requirements**

**Section 6.4(c)**  Yes  No Does the system or project include access controls to ensure limited access to information maintained by the system or project?

*Explanation for Answer in Section 6.4(c):* The OFR monitors administrative access to its infrastructure resources through a continuous monitoring program.

Access controls for the Website are enforced by the OFR Information Security Team. Only authorized personnel have access to monitoring tools. The Website is categorized as a FIPS 199 moderate system and NIST 800-53 controls are configured in accordance with a FIPS 199 moderate baseline.

Access to data will be granted on an as-needed, least-privilege basis through the approval process outlined in the OFR Access Control Procedures included in Exhibit A. Multiple layers of approval are required prior to granting access to data or systems at the OFR.

In general, access to data in the system is limited to administrators of the OFR’s website and email system, members of the OFR Information Security Team (email addresses and security and usability log information), and other OFR employees who demonstrate a clear need-to-know the information (e.g. members of the External Affairs team, limited to email addresses only). Access is determined and approved through a workflow outlined in the OFR Access Control Procedures.

Additionally, all OFR employees must complete annual Privacy and Information Security training and are required to sign and abide by Rules of Behavior for access to OFR systems and resources, both of which outline employees’ roles and responsibilities as they relate to access to and use of information.



### Security Risks in Manner of Collection

**Section 6.4(d)**  Yes  No In **Section 4.3** above, you identified the sources for information used in the system or project and the method and manner of collection. Were any security, privacy, or civil liberties risks identified with respect to the manner in which the information is collected from the source(s)?

*Explanation for Answer in Section 6.4(d):* Yes. There are privacy risks associated with data quality, participation, and notice.

With regards to data quality, there is a risk that data in the system may not be accurate or correct. With regards to participation and notice, there is a risk that individuals may not understand that their information is being collected (including by a third party to facilitate email distribution), and may have limited opportunities for correcting or amending their information.

To mitigate these risks, the OFR relies on individuals providing their information to help ensure that the data provided is current and not out of date. Further, the OFR provides notice through the Website privacy policy and provides opportunities for individuals to update or amend their information. Individuals are informed at the time of input of their information that the OFR uses GovDelivery for its email subscription services through a notice posted on the OFR GovDelivery page and a link to the Website privacy policy. Individuals are also directed to the GovDelivery privacy policy through the Website privacy policy. Individuals are provided further notice of the collection of information about their use of the site, including that which is collected for securing and improving the usability of the site through the Website privacy policy. Additionally, email addresses added to the distribution list for email communications are subject to validation rules within the system, and any invalid email addresses (e.g., returned undeliverable, invalid format) noted by the email system are removed from the distribution list. Likewise, individuals who use the “Contact Us” function may submit email directly to the OFR with their inquiries and are provided notice regarding the collection of their email address by the OFR and their correspondence for response through the Website privacy policy. OFR employees and individuals who contribute to OFR work products posted on the Website, or who have their biographies posted on the Website are provided notice at the time of collection that such information will be made publicly available. Participation is voluntary.

Finally, the OFR provides a means by which individuals can update their information in the system to confirm its currency and accuracy. Individuals who have elected to receive email communications from the OFR may update their address or subscription preferences at any time. Individuals may request to be unsubscribed from OFR email communications by accessing a link that is provided in messages that are distributed by the OFR. Individuals will remain subscribed to OFR email communications until they elect to unsubscribe. Individuals who use the “Contact Us” function do so by submitting an email correspondence from their own email address and may send a revised correspondence or updated email address using the same function. Individuals who have their information included in work products may have limited opportunities to update information after it is published since such materials are static. OFR employees who have biography pages posted on the Website provide their own information and may update the information as necessary in accordance with internal procedures. Participation is voluntary and biographies are regularly reviewed to ensure accuracy.

### Security Controls When Sharing Internally or Externally

**Section 6.4(e)**  Yes  No  N/A Are all Treasury/bureau security requirements met in the method of transferring information (e.g., bulk transfer, direct access by recipient, portable disk, paper) from the Treasury project or system to internal or external parties?

*Explanation for Answer in Section 6.4(e):* PII collected through the Website is not shared with external parties or with other Treasury bureaus or offices, except as required by law or with the explicit consent of impacted individuals.

### Monitoring of Individuals

**Section 6.4(f)**  Yes  No Will this system or project have the capability to identify, locate, and monitor individuals or groups of people?

*Explanation for Answer in Section 6.4(f):* The system will not allow for the identifying or locating of individuals. However, the system will allow for monitoring of users of the website, including those administering the site, for security, auditing, and functionality purposes only. The system monitoring capabilities are limited to those necessary to ensure the security and usability of the system. To achieve this goal, the Website collects information about use, including:

- Internet domain of the visitor;
- IP address of the visitor;
- Operating system and browser used by the visitor to access financialresearch.gov;
- Date and time of access, pages visited, and length of visit(s).

Such information does not directly identify an individual. Generally, no effort is made by OFR to use this information to attempt to identify individuals indirectly either. The only time such linkage would be necessary is in the event that an individual accessed the Website to commit a criminal act or pursuant to a valid law enforcement request.

Like many websites, OFR's uses web technologies that analyze how visitors are using the Website or improve the user experience. These tools may include cookies, in the form of session or persistent cookies. None of the cookies used by the OFR on the Website store any directly-identifying information, and are only used to enhance the experience of visitors to the Website by reducing redundant information input or allowing visitors to move back and forth between pages on the Website.

Individuals have the option not to accept cookies, or to change their browser's options to not accept them or to prompt the Website visitor before accepting them. The OFR provides notice of its use of cookies on the Website, instructions on how Website visitors may disable cookies, and the consequences of doing so through the Website's privacy policy. Finally, the Website uses Google Analytics to generate summary, non-identifying data about visits to the Website. Users are informed of the use of Google Analytics and are provided a link to the Google privacy policy through the Website's privacy policy.

The [OFR Website Privacy Policy](#) has been attached as Exhibit B to this PCLIA.

### Audit Trails

**Section 6.4(g)**  Yes  No Are audit trails regularly reviewed to ensure appropriate use, handling, and disclosure of PII maintained in the system or by the project inside or outside of the Department?

*Explanation for Answer in Section 6.4(g):* The Website captures audit logs of visitors, employees, government contractors, and subcontractors using the tool to ensure proper use of the Website. The Website also uses cookies as outlined in Section 6.4(f) of this PCLIA.

Site monitoring is done in accordance with internal OFR information system audit and accountability procedures. Event logs and log management tools are secure and access is limited to authorized staff only. Audit logs and audit settings at the OFR may not be tampered with, deleted, or disrupted. Any changes must be approved by the OFR Change Control Board (CCB) through a formal review of a



configuration change request. Finally, audit logs generated and captured as a result of this monitoring do not contain directly-identifying PII.

## **Section 6.5: Section 508 of the Rehabilitation Act of 1973 Compliance**

When federal agencies develop, procure, maintain, or use Electronic and Information Technology (“EIT”), [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998) requires that individuals with disabilities (including federal employees) must have access and use (including privacy policies and directives as well as redress opportunities) that is comparable to that which is available to individuals who do not have disabilities.

### **Applicability of the Rehabilitation Act**

**Section 6.5(a)**  Yes  No Will the project or system involve the development, procurement, maintenance, or use of EIT as that term is defined in [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998)?

### **Compliance With the Rehabilitation Act**

**Section 6.5(b)**  Yes  No  N/A Does the system or project comply with all [Section 508](#) requirements, thus ensuring that individuals with disabilities (including federal employees) have access and use (including access to privacy and civil liberties policies) that is comparable to that which is available to individuals who do not have disabilities?

*Explanation for Answers in Sections 6.5(a) thru 6.5(b):* The OFR has completed a Voluntary Product Accessibility Template (VPAT), which documents the Website’s conformance with the accessibility standards under Section 508 of the Rehabilitation Act.

## **Section 7.0: Redress**

### **Freedom of Information Act and Privacy Act Redress**

**Section 7.0(a)**  Yes  No Does the agency have a published process in place by which individuals may seek information and redress under the [Freedom of Information Act](#) and [Privacy Act](#)?

*Explanation for Answer in Section 7.0(a):* The Treasury FOIA Regulations can be found at 31 CFR Part 1, Subpart A.

### **Privacy Act Access Exemption**

**Section 7.0(b)**  Yes  No Was any of the information that is maintained in a [system of records](#) and used in the system or project exempted from the access provisions of the [Privacy Act](#)?

*Explanation for Answer in Section 7.0(b):* Information collected and maintained by the Website that is subject to the Privacy Act is not exempt from the access provisions of the Privacy Act.

### **Additional Redress Mechanisms**

**Section 7.0(c)**  Yes  No With respect to information maintained by the project or system (whether or not it is covered by the [Privacy Act](#)), does the bureau or office that owns the project or system have any additional mechanisms other than [Privacy Act](#) and FOIA remedies (e.g., a customer satisfaction unit; a complaint process) by which an individual may

request access to and/or amendment of their information and/or contest adverse determinations about denial of their rights, benefits, and privileges under federal programs (e.g., decisions about whether the individual will receive a financial benefit, get a clearance or access to a Treasury facility, or obtain employment with Treasury)?

*Explanation for Answer in Section 7.0(c):* The OFR relies on individuals to provide their data voluntarily by signing up to receive OFR email, by using the “Contact Us” function on the Website, by their general use of the Website, or as part of their responsibilities related to employment or association with the OFR (in developing work product, etc.). Individuals are provided information about how information collected through the Website will be used through the [OFR Website Privacy Policy](#) and this PCLIA, and they are provided contact information for any questions they may have about their data. Additionally, the OFR provides a means by which individuals can update their information in the system to ensure its currency and accuracy. Individuals who have elected to receive email communications from the OFR may update their address or subscription preferences at any time through GovDelivery and may request to be unsubscribed from OFR email communications by accessing a link that is provided in messages that are distributed by the OFR. Individuals who use the “Contact Us” function may use that same function to supply a new email address or update their original correspondence. OFR researchers and senior staff who have their biographies published on the Website may update this information at any time via internal OFR procedures and participation is voluntary.

Finally, it is important to note that PII collected through the Website is not used to make determinations about an individual’s rights, benefits, or privileges under federal programs. This greatly reduces the likelihood that redress would be necessary.

## Responsible Officials

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Associate Director, Application and Decision  
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U.S. Department of the Treasury

John Talbot  
Chief Technology Officer  
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## Approval Signature

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Chief Technology Officer  
Office of Financial Research  
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