

Third Party Application Privacy Impact Assessment

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Name of Third Party Application: IIP Cloud ITAB Number: 7455 Month and Year PIA was completed: December 13, 2013	

1) Purpose of the Department of State’s use of a third-party website or application. (Henceforth, third-party website or applications will be referred to as third party applications.)

(a) Give a general description of the third party application.

The **IIP Cloud** is an umbrella grouping of multiple systems with similar degrees of privacy information and record subjects. The multiple children systems are built on a cloud computing platform-as-a-service that uses Chatter, the Salesforce packaged application that provides a central repository of an individual’s profile data made accessible via a link on all the children systems. Each IIP Cloud user has an internal Chatter profile, where internal users can post visible or private messages to facilitate work communication. Chatter as its own entity is comparable to a Facebook wall. All users can send messages to each other on Chatter, but there’s no integration with any IIP Cloud children systems.

The IIP Cloud grouping of systems support programs managed by the U.S. Department of State’s Bureau of International Information Programs (IIP), in particular, those programs involved with the dissemination of information internally to the Department. IIP Cloud includes the following four systems:

- **IIP Cloud Pitch System**

The Pitch System establishes a standard workflow and allows the IIP Editorial Board to be accessible and transparent. Through the Pitch System, IIP staff will have a means of proposing new projects, monitoring assignment progress, and reporting on final outcomes from a desktop or mobile device.

IIP Cloud

The Pitch System is a new communication environment for the IIP Editorial Board. It enables: A transparent listing of all news worthy article suggestions, or “pitches,” submitted to the Board Management and IIP Front Office queues.

IIP management created the Editorial Board as a means to oversee the development and approval of all content. In year 2011, proposals were sent to the Board in a text document via email and sent to a Microsoft Outlook calendar. While it was general practice to organize board meetings via Outlook, this was not a standardized practice and confusion remained among staff about procedures.

- **IIP Cloud Publishing System**

The Publishing System is the hub where content creators, editors and translators construct public-domain documents and articles in English and 6 other languages, and disseminate the documents to support the U.S. Department of State's public diplomacy efforts. The Publishing System disseminates this content by transmitting files to another Department system, IIP Digital.

- **IIP Cloud Help Desk**

The IIP Cloud Help Desk is a trouble-ticket system dedicated to the IIP/CSS/CMS systems, in particular to the Content Management System hosting every embassy website, consulate website and “virtual presence post” in the U.S. Department of State.

The IIP Cloud Help Desk will serve as a way to measure performance of the IIP/CSS/CMS team's Help Desk staff, offering metrics related to the team's service-level agreement and customer satisfaction. It does not capture individual team member's performance, just the aggregated performance of the Help Desk.

- **IIP Cloud CO.NX Requests**

IIP Cloud-CO.NX Requests offers a new way to process program requests from the field. It establishes a standard workflow and makes the request process accessible and transparent. Through the IIP Cloud CO.NX Requests System, the team will have a means of capturing program requests, moving requests through a workflow, and reporting on final outcomes from a desktop or mobile device.

- **IIP Cloud Project Management System**

IIP Cloud-Project Management System provides management with a tool to capture required information in a central location as well as provide robust reporting tools for the aggregation of information.

- **IIP Cloud American Spaces**

American Spaces Program exemplifies the U.S. commitment to a core tenet of democracy: the citizen's right to free access to information. American Spaces provide welcoming environments where foreign visitors can connect and learn about the United States.

IIP Cloud

IIP Cloud American Spaces is a member application under the IIP Cloud business group of systems. IIP Cloud American Spaces captures information on all categories of “Spaces” in the Program to include facilities hosting American Corners, American Centers, Information Resource Centers, Science Corners, Binational Centers and Lincoln Centers.

IIP Cloud American Spaces will serve as a way to measure attendance at public events hosted at American Spaces worldwide. Counts only will be included in the system, with no information on individuals in attendance.

(b) What is the specific purpose for using the third-party application and how does this purpose assist in accomplishing the Department’s mission?

The purpose of the IIP Cloud initiative is to create a single entry point for all IIP staff to produce and report on work, improving accountability and managerial oversight. It creates a central repository of materials currently stored on multiple third-party platforms and desktop locations.

IIP Cloud is developed and hosted in a Cloud platform environment and therefore meets the Department’s IT Strategic Plan 2nd goal: Cloud Computing. The transition to IIP Cloud will result in the migration of server-hosted data to the Cloud, decreasing the department’s need for onsite storage and maintenance.

(c) Is the use of the third-party application consistent with all applicable laws, regulations, and policies?

Yes, the use of Salesforce is consistent with all applicable laws, regulations and policies.

(d) What federal authorities permit the collection of information for the intended purpose of this application?

- 5 U.S.C. 301 (Management of the Department of State);
- 22 U.S.C. 1431 et seq. (Smith-Mundt);
- United States Information and Educational Exchange Act of 1948, as amended;
- 22 U.S.C. 2451-58 Fulbright-Hays Mutual Educational and Cultural Exchange Act of 1961, as amended;
- 22 U.S.C. 2651 a (Organization of the Department of State); and
- 22 U.S.C. 3921 (Management of the Foreign Service).

2) Personally Identifiable Information (PII) available through the use of the third-party application.

(a) What PII will be made available to the Department?

IIP Cloud

All systems within the IIP Cloud business group of systems provide links to the Salesforce packaged application Chatter. The Department of State's policy and guidelines restrict the information entered by Department staff about themselves (to include full-time employees and contractors) to the following elements of PII in the Chatter repository:

- Name
- Email Address (Government / business only)
- Telephone (Government / business only)

In addition to the Chatter profile link, the IIP Cloud American Spaces collects the following information about the U.S. Department of State contact person for an American Space :

- Name
- Location (Address, City, State/Province) of the "American Space"

(b) What are the sources of the PII?

Users create their own Salesforce Chatter profile which links to the IIP Cloud system, and each user updates his/her own profile information. This feeds into the IIP Cloud Pitch System, Publishing System, and Help Desk.

Contact and location information in the IIP Cloud American Spaces is either entered by the individuals themselves or is entered by U.S. Department of State staff supporting the American Spaces program using information from the Department's global address list.

(c) From which individuals is the information collected?

IIP Cloud contains contact information of current U.S. Department of State personnel (both employees and contractors).

(d) Does this collection of information require compliance with the Paperwork Reduction Act (PRA) and, if so, how will the Department comply with the statute?

This collection of U.S. Department of State personnel contact information does not require compliance with the Paperwork Reduction Act.

3) Intended or expected use of PII

(a) How will the Department use the PII described in Section 2 above?

Within IIP Cloud systems, the contact information is collected and maintained to provide the authorized users with a means to contact other users to facilitate work communication.

(b) Provide specific examples of how the PII may be used.

- IIP Cloud American Spaces reports compiles the statistical data users input each month. The system also captures contact information on each Space so IIP's American Spaces office can contact the field regarding statistics.
- IIP Cloud Help Desk captures requestor's name and government email information so that the IIP Help Desk can respond to the help request.

4) Sharing or disclosing PII

(a) With what entities or persons inside or outside the Department will the PII be shared and for what purpose will the PII be disclosed?

Information from the IIP Cloud applications is managed and utilized by authorized users only and is not shared inside or outside of the Department.

(b) How will the PII be transmitted or disclosed to internal or external entities or persons?

PII is not transmitted nor disclosed.

(c) What safeguards will be in place to prevent uses other than those legally authorized and described in this PIA?

When shared within the Department, all information is still used in accordance with IIP Cloud's stated authority and purpose. Risks to privacy are mitigated by granting access only to authorized persons. All IIP Cloud systems are internal to the Department of State. The public does not have direct access to any of the systems.

All personnel of the Department of State have undergone a thorough personnel security background investigation. Access to Department of State facilities is controlled by security guards and admission is limited to those individuals possessing a valid identification card or individuals under proper escort. Records containing personal information are maintained within IIP Cloud to which access is limited to authorized personnel. Access to computerized files is password-protected and under the direct supervision of the IIP Cloud Environment Manager. The Environment Manager has the capability of printing audit trails of access from the computer media, thereby permitting regular ad hoc monitoring of computer usage.

5) Maintenance and retention of PII

(a) How will the Department maintain the PII and for what time period?

IIP Cloud

IIP Cloud Help Desk, Pitch System, Publishing System, American Spaces, and Salesforce Chatter records will be maintained until they become inactive, at which time they will be destroyed or retired in accordance with published record schedules of the Department of State and as approved by the National Archives and Records Administration.

(b) Is there a records disposition schedule covering this collection? If so, what is the retention period?

IIP Cloud facilitates a business workflow. Records disposition schedules covering this collection are:

- *Chapter 37: Bureau of International Information Programs, Office of Web Engagement A-37-008-07 - Content Management System (CMS) .
Authorization Number: GRS 24, item 4a*
- *Chapter 37: Bureau of International Information Programs, Office of Regional Coordination and American Spaces A-37-003-02 - IRC Knowledge Database
Authorization Number: N1-059-09-21, Item 2*

The retention period for both Schedules is Temporary.

6) Securing PII

(a) Will the Department’s privacy and security officials collaborate to develop methods for securing PII?

The IIP Cloud C&A team has worked to establish safeguards to secure PII.

All authorized staff using the system must comply with the Department of State’s general “appropriate use policy for information technology”. Rules of behavior and consequences, and system use notifications are in accordance with the Privacy Act (subsection e[9]) and OMB Circular A-130, Appendix III.

The security controls in the system are reviewed when significant modifications are made to the system, but at least every three years.

(b) Describe how a user will access the third party application.

Access to IIP Cloud is restricted to authorized Department of State personnel that need to use the system as part of their work requirement. Only authorized system users can access IIP Cloud through a Salesforce login portal that requires an ID and password to allow for controlled updates to the respective child system. Users who need system access must complete a System Access Request Form that is approved by a supervisor. After the form is submitted, an IIP Cloud system administrator will create a user ID and password for the new user.

IIP Cloud

Authorized user login identifiers are appended to any system records created or updated. This allows administrators to identify the source of any incorrect or incomplete data as recorded in the system. Audit logs are available on demand for review and are exported monthly for review by the ISSO. Contractors authorized to access the system are governed by contracts identifying rules of behavior for Department of State systems and security. Contracts are reviewed upon renewal by management and contract personnel experts in such matters.

7) Identifying and mitigating other privacy risks

What other privacy risks exist and how will the Department mitigate those risks?

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8) Creating or modifying a system of records

(a) Is there an existing system of records to cover this collection of records as required under the Privacy Act of 1974?

Yes.

(b) If "yes" to the question above, which system of records notice (SORN) covers this collection? (For a list of all Department published SORNS, go to www.state.gov/m/a/ips/c25533.htm).

STATE-40 Employee Contact Records, is the system of records notice covering this collection.

(c) Is notice provided to the record subjects, other than through the SORN (e.g., through a Privacy Act statement or privacy notice)?

The Department of State Privacy Statement is posted on the home page of the IIP Cloud portal, meaning it is the first page viewed by all IIP Cloud application users.