USAID Open Data Privacy Analysis Template

A Mandatory Reference for ADS Chapter 508

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Management Bureau/Chief Information Officer/Information Assurance Division (M/CIO/IA)

USAID OPEN DATA PRIVACY ANALYSIS (ODPA)

FOR POSTING DATASETS TO THE PUBLIC

Click here to enter text.

Version Click here to enter text.

Approved: Click here to enter a date.

CHANGE HISTORY

The table below identifies all changes incorporated into this template. Baseline changes require review and approval. The version states the number with either D for draft or F for final.

Change #	Date	Version	Description
1.	Click here to enter a date.	1D	Click here to enter text.
2.	Click here to enter a date.		Click here to enter text.
3.	Click here to enter a date.		Click here to enter text.
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1. INTRODUCTION

The USAID Privacy Office is using this Open Data Privacy Analysis (ODPA) Template to gather information from Program Managers and Datasets Managers in order to discover any information privacy issues.

The ODPA process should accomplish two goals: 1) determine whether a particular dataset involves any information privacy risks, such as whether the dataset contains PII; and 2) identify whether the operating unit managing the dataset needs to comply with any privacy protection requirements, such as procedures the Datasets Manager must use to remove any PII from the dataset before the dataset is posted to a public web site.

Type *Not Applicable* in the answer boxes for those questions that do not apply to your dataset and explain why the question is not applicable. Each section includes assistance (in blue text) on how to answer the question. For additional instructions how to complete this ODPA Template, please see Appendix C Completing the ODPA.

If you have questions about or would like assistance with this ODPA Template, the ODPA process, or other privacy compliance requirements, please contact the USAID Privacy Office at **privacy@usaid.gov**.

2. CONTACT INFORMATION AND APPROVAL SIGNATURES

PROGRAM MANAGER

Name:
Title:
Office Name:
Office Phone #:
E-Mail:

Program Manager (PM) means a USAID official responsible and accountable for the conduct of a government program. A government program may be large (e.g., may provide U.S. assistance to other nations); it may also be a support activity such as the Agency's personnel or payroll program.

DATASETS MANAGER

Name:
Title:
Office Name:
Office Phone #:
E-Mail:

Signature Date: Click here to enter a date.

Signature:

Datasets Manager means an individual responsible for program and operational management of their specific USAID dataset. The Datasets Manager is responsible for determining whether a particular dataset contains PII and for ensuring that the program complies with all privacy protection requirements, such as removing PII from the dataset and the metadata associated with that dataset before the dataset is posted to a web site available to the public.

PRIVACY ANALYST

Name:
Title:
Office Name: Privacy Office (M/CIO/IA)
Office Phone #:
E-Mail:

Signature Date: Click here to enter a date.

Signature:

Privacy Analyst means a privacy analyst in the USAID Privacy Office (M/CIO/IA).

3. INFORMATION

3.1 PROGRAM INFORMATION

3.1.1 Describe the program that collects, uses, maintains, or disseminates the dataset.

Click here to enter text.

Provide a general description of the program. The description should include the purpose of the program and how it supports a USAID business function. Describe the way the program operates to achieve its purpose, and any interconnections with other programs. Provide information on where the program operates, such as locally, stateside, overseas, or worldwide.

Describe the types of information that you use, and explain why and how you use the information.

The description should be as comprehensive as necessary to assist the public in understanding the program fully.

3.2 DATASETS INFORMATION

3.2.1 Describe the dataset and its purpose.

Click here to enter text.

Provide a general description of the dataset. The description should include the original purpose of the dataset (not the current one to post on web site) and how it supports the USAID program's business function.

Describe the way the dataset was collected, how information is transmitted from the collection through use, and any interconnections with other datasets or systems. Provide information on where the dataset was collected, such as locally, stateside, overseas, or worldwide.

The description should be as comprehensive as necessary to assist the public in understanding the dataset fully.

3.2.2 What type of system and/or technology is involved in the collection, use, maintenance, or dissemination of the data?

(Please check all that apply. If you choose New Technology *or* Other, *please explain.)*

☐ Network

☐ Database

☐ Software

☐ Hardware

☐ Mobile Application or Platform

☐ Mobile Device Hardware (cameras, microphones, etc.)

☐ Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)

☐ Wireless Network

3.2.2 What type of system and/or technology is involved in the collection, use, maintenance, or dissemination of the data?

(Please check all that apply. If you choose New Technology *or* Other*, please explain.)*

☐ Social Media

☐ Advertising Platform

☐ Website or Webserver

☐ Web Application

☐ Third-Party Website or Application

☐ Geotagging (locational data embedded in photos and videos)

☐ Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)

☐ Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)

☐ Facial Recognition

☐ Identity Authentication and Management

☐ Smart Grid

☐ Biometric Devices

☐ Bring Your Own Device (BYOD)

☐ Remote, Shared Data Storage and Processing (cloud computing services)

☐ Other: Click here to enter text.

☐ None

3.2.3 Do you use any information collection forms or surveys?

(If you choose Yes*, please provide the form or survey, and OMB Control Number and USAID number.)*

☐ No.

☐ Yes: Click here to enter text.

Attach a copy of the form or the survey as an appendix to the ODPA. If there are multiple forms or surveys, attach a copy of the forms or surveys in the appendix and include a list in the response to this question within the ODPA. State whether these forms or surveys include a Privacy Act Section (e)(3) Statement or Notice that describes the authorities to collect PII, the PII purposes and uses, and the effects on the individual of not providing the PII.

Before you use any forms or surveys to collect personal information outside of your immediate office, you must contact and work with the Bureau for Management, Office of Management Services, Information and Records Division (M/MS/IRD), pursuant to the USAID policies and procedures in ADS 505, Forms Management Program,

3.2.3 Do you use any information collection forms or surveys? *(If you choose* Yes, *please provide the form or survey, and OMB Control Number and USAID number.)*
and ADS 506, Reports Management. IRD will assist you to determine whether you will need to get USAID and/or OMB approval, and to complete the USAID and/or OMB approval processes, if needed.

3.3 PERSONAL INFORMATION

3.3.1 What types of personally identifiable information does the dataset contain? *(Please check all that apply. If you choose* Other, *please list the additional types of PII.)*
☐ Name, Former Name, or Alias
☐ Mother's Maiden Name
☐ Social Security Number or Truncated SSN
☐ Date of Birth
☐ Place of Birth
☐ Home Address
☐ Home Phone Number
☐ Personal Cell Phone Number
☐ Personal E-Mail Address
☐ Work Phone Number
☐ Work E-Mail Address
☐ Driver's License Number
☐ Passport Number or Green Card Number
☐ Employee Number or Other Employee Identifier
☐ Tax Identification Number
☐ Credit Card Number or Other Financial Account Number
☐ Patient Identification Number
☐ Employment or Salary Record
☐ Medical Record
☐ Criminal Record
☐ Military Record
☐ Financial Record

3.3.1 What types of personally identifiable information does the dataset contain?

(Please check all that apply. If you choose Other*, please list the additional types of PII.)*

☐ Education Record

☐ Biometric Record (signature, fingerprint, photograph, voice print, physical movement, DNA marker, retinal scan, etc.)

☐ Sex or Gender

☐ Age

☐ Other Physical Characteristic (eye color, hair color, height, tattoo)

☐ Sexual Orientation

☐ Marital status or Family Information

☐ Race or Ethnicity

☐ Religion

☐ Citizenship

☐ Other: Click here to enter text.

☐ None

Personally Identifiable Information (PII) means information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available — in any medium and from any source — that, when combined with other available information, could be used to identify an individual.

3.3.2 About what types of people does the dataset have personal information?

(Please check all that apply. If you choose Other*, please provide the types of people.)*

☐ Citizens of the United States

☐ Aliens lawfully admitted to the United States for permanent residence

☐ USAID employees, including Foreign Service National (FSN) Direct Hires, FSN Personal Services Contractors, and Third Country National Employees

☐ Employees of USAID contractors or service providers

☐ Aliens

3.3.2 About what types of people does the dataset have personal information?

(Please check all that apply. If you choose Other, *please provide the types of people.)*

☐ Business Owners or Executives

☐ Others: Click here to enter text.

Alien means someone who is not a citizen of the United States or an alien lawfully admitted for permanent residence.

Foreign Service National Direct Hire (FSNDH) Employee means1) a non-U.S. citizen employee hired by a USAID Mission abroad, whether full or part-time, intermittent or temporary, and inclusive of a Third Country National (TCN) who is paid under the local compensation plan (LCP), and 2) who was appointed under the authority of the Foreign Service Act of 1980.

Foreign Service National Personal Services Contractor (FSNPSC) Employee means 1) a non-U.S. citizen employee hired by a USAID Mission abroad, whether full or part-time, intermittent, or temporary, and inclusive of a Third Country National (TCN) who is paid under the local compensation plan (LCP), and 2) who entered in a contract pursuant to the AIDAR, Appendix J.

Third Country National (TCN) Employee means a USAID employee who is 1) neither a U.S. citizen nor a permanent legal resident alien of the United States nor a host-country citizen, and 2) eligible for return travel to the home country or country of recruitment at U.S. Government expense.

4. PRIVACY RISKS AND CONTROLS

4.1 PRIVACY RISKS

4.1.1 How will you identify whether the dataset or the metadata associated with the dataset contains PII?

Click here to enter text.

Describe your processes and procedures for identifying ***whether*** there is PII in the dataset or the metadata associated with the dataset. Describe also your processes and procedures for determining ***where*** the PII is in the dataset or the metadata associated with the dataset. Also, describe how you will determine ***what*** PII is in the dataset or the metadata associated with the dataset.

4.1.2 How will the public be able to retrieve dataset information?

Click here to enter text.

Describe how the public will be able retrieve information from the web site where the dataset will be posted. Provide a detailed description of the identifiers or retrieval elements.

4.1.3 Does the usefulness of the dataset depend on retaining PII in the data set?

☐ No.

☐ Yes: Click here to enter text.

Describe why you need to retain PII in the dataset. Describe what specific PII is needed and why.

Anonymized data means data from which the individual cannot be identified by the recipient of the information. Sometimes known as de-identified. To anonymize or de-identify PII in a report, individuals' names, addresses, and full postal/zip codes must be removed together with any other information which, in conjunction with other data held by or disclosed to the recipient, could identify the individual.

4.1.4 Will the dataset derive new data or create previously unavailable data about an individual through aggregation or derivation when added to other datasets posted on web sites available to the public?

(If you choose Yes*, please explain.)*

☐ No.

☐ Yes: Click here to enter text.

Discuss whether the dataset will aggregate or derive data about individuals.

Modernized systems often have the capability to derive new data and create previously unavailable data about an individual through aggregation of the information collected. The *mosaic effect* is the idea that disparate pieces of information, though individually of limited or no value, can be significant when combined with other pieces of information that could result in an unforeseen vulnerability, exploitation or misuse of the information.

Derived data is information obtained from a source for one purpose and then used to deduce/infer a separate and distinct bit of information.

Data aggregation is the taking of various data elements and then turning them into a composite of all the data to form another type of data (i.e., tables or data arrays) that is usually different from the source information.

4.1.5 Do you use new technology or technology used in ways not previously used by USAID?

(If you choose Yes*, please provide the specifics of any new privacy risks and mitigation strategies.)*

☐ No.

☐ Yes: Click here to enter text.

Describe the new technology or the way you use technology that is new to USAID. Describe how such new technology or uses will affect the risks to the PII in the dataset or system.

4.2 PRIVACY CONTROLS

4.2.1 What measures will you take to ensure that PII is removed from the dataset and the metadata associated with the dataset before it is posted to a web site available to the public?
Click here to enter text.
Describe the policies, procedures, and control methods will you follow to ensure that PII is removed from the dataset and the metadata associated with the dataset before it is posted to a web site available to the public.

4.2.2 If the usefulness of the dataset depends on retaining PII in the data set, how will you anonymize the data sufficiently to remove the possibility that the data will be able to be used to identify individuals?
☐ No.
☐ Yes: Click here to enter text.
Describe how you will anonymize the data and de-identify the specific PII that you will retain. Explain the risks that the PII retained can be combined with other data either to identify an individual or used in ways that the individual did not intend. *Anonymized data* means data from which the individual cannot be identified by the recipient of the information. Sometimes known as de-identified. To anonymize or de-identify PII in a report, individuals' names, addresses, and full postal/zip codes must be removed together with any other information which, in conjunction with other data held by or disclosed to the recipient, could identify the individual.

4.2.3 How will you handle any unintended or inappropriate disclosure of PII?
Click here to enter text.
Describe your processes and procedures for correcting any unintended or inappropriate disclosure of PII. Explain how you will remove any PII from the dataset that has already been posted on a web site available to the public. Describe how you will respond to a request to remove certain data from the data set posted on a web site available to the public.

4.2.4 How do you ensure that USAID program employees, contractors, and service providers understand their responsibility to protect PII and the procedures for protecting PII?
Click here to enter text.
Describe privacy training and awareness activities, and provide any privacy rules of behavior documents.

4.2.5 How do you audit and/or monitor the dataset and metadata privacy controls to ensure that the safeguards you use actually do guard against privacy risks?
Click here to enter text.
Describe how you will ensure that the policies, procedures, and control methods you have chosen will be followed and that the PII is actually removed from the dataset in accordance with the stated practices in this ODPA. Discuss auditing measures, as well as technical and policy safeguards. If applicable, describe how you will ensure that any PII not removed from the dataset will be sufficiently anonymized or de-identified in accordance with the stated practices in this ODPA. Describe how you will ensure that any mosaic effect risks will be mitigated in accordance with the stated practices in this ODPA.

STOP Please stop here and send this form to the Privacy Office at **privacy@usaid.gov**. The Privacy Office will review your information and contact you.

- If more information is needed, the Privacy Office will contact you with questions or will send you the appropriate form(s) to complete.
- If this ODPA is ready for the approval process, the Privacy Office will send you this form to sign.

5. APPENDICES

5.1 APPENDIX A COMPLETING THE ODPA

5.1.1 Background

USAID is required to protect PII against anticipated threats or hazards that could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained and to USAID. ODPAs provide information on how programs handle PII, so that USAID employees and contractors will be able to fulfill their requirement to protect PII against unauthorized access or disclosure by ensuring that only those people who have a clearly demonstrated need to know or use the information are given access.

The ODPA is a risk-based analysis that enables USAID to determine whether a particular program will encounter any privacy risks during the conduct of USAID business functions, specifically, in regard to posting any dataset to a public web site. The ODPA process is designed to be a cross-cutting tool to address the requirements of several different privacy laws and policies. An ODPA should be conducted initially for each dataset being considered for posting to a public web site and thereafter periodically and before developing or changing any dataset posting process covered by the original ODPA, including any new or updated dataset.

This ODPA Template is being used to gather information from Program Managers and Datasets Managers. The information provided will be used by the Privacy Analyst to analyze the privacy risks of the dataset and the process used for posting the dataset to a public web site.

If you have questions about or would like assistance with this ODPA Template, the ODPA process, or other privacy compliance requirements please contact the USAID Privacy Office at **privacy@usaid.gov**.

5.1.2 Using this Word Template

This ODPA form is a fillable Word template, which means that you can fill in the information in the appropriate fields, save the document, and submit the ODPA electronically as an e-mail attachment. To create an ODPA Word document from this ODPA Template, use the following steps:

1. Click on **File** and then **Save As**.
2. In the **Save As** window save your ODPA using the name provided; just update the date and version number with D for draft.
3. Then select **Word Document (*.docx)** from the **Save as type**: drop-down list.

5.1.3 Completing the ODPA Template

This ODPA Template has various fields to be completed. First, fill in or update the fields on the Title Page, Headers and Footers, and Change History Page.

- Fill in or edit, if appropriate, the Program Name section on the title page. Update the Version number on the title page. The Approved date on the title page will be completed at the end of the process.
- Fill in the Program Name field in the Header, and the Date field in the Footer. The date in the Footer should be the date you send this ODPA to the Privacy Office for review.
- Update the Change History page to reflect your new version of this ODPA. The date in the Change History should be the date you send this ODPA to the Privacy Office for review.

Complete the contact information in Section 2: Contact Information and Approval Signatures. Insert the appropriate Name, Title, Office Name, Office Phone Number, and E-Mail address for the Program Manager and Dataset Manager.

Continue to Section 3: Information, and answer the questions.

5.1.4 Answering the Questions

When completing this template, please respond to each question as if speaking to a member of the general public who is learning of this dataset for the first time.

- Each question has an answer box. Some answer boxes are simple text boxes, while other answer boxes have items to select, as appropriate.
- When you see a box (□), you will be able to click on it to create a check mark to choose that item. Please select all items that apply. You should be able to add explanatory remarks in the answer boxes.
- Each section includes assistance (in blue text) on how to answer the question.
- Answer each question fully and completely. Answer each question with sufficient detail to permit the Privacy Office to analyze the possible privacy issues.
- Type *Not Applicable* in the answer boxes for those questions that do not apply to your dataset and explain why the question is not applicable.
- Spell out each acronym the first time it is used in the ODPA.
- Define technical terms or references, and keep in mind readers may not understand technical terms until they are explained.
- Use short and simple sentences.
- Use Spell Check and Grammar Check before submitting the ODPA for approval.

5.1.5 Help Interpreting the Questions

Some questions provide choices, with the option to either pick one or pick all that apply. The questions that do not provide choices include explanations of the type of information that is required.