



**USAID**  
FROM THE AMERICAN PEOPLE

## OTI Anywhere Privacy Impact Assessment (PIA)

### UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

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Office of the Chief Information Officer (M/CIO)  
Information Assurance Division  
OTI Anywhere  
Approved Date: September 30, 2015

#### Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

#### Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

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## 1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

## 2 Information

### 2.1 Program and System Information

#### 2.1.1 Describe the PROGRAM and its PURPOSE.

The Office of Transition Initiatives (OTI) was created within USAID’s Bureau for Democracy, Conflict, and Humanitarian Assistance (DCHA) in 1994. OTI provides fast, flexible, short-term assistance taking advantage of windows of opportunity to build democracy and peace. OTI lays the foundations for long-term development by promoting reconciliation, jumpstarting peace processes, and helping stable democracy take hold.

#### 2.1.2 Describe the SYSTEM and its PURPOSE.

OTI Anywhere (OTI/A) is a project management and collaboration website for OTI staff in Washington, DC and in-country Implementing Partners (IP), located abroad, who support the global missions of USAID. The primary purpose of OTI/A is to improve communication and information sharing among OTI/A users.

OTI works on projects around the world. Each project has a team of OTI staff and IP. OTI/A is divided into team sites to support these projects. Each team site includes team member profiles, links to important resources, answers to frequently asked questions, and a document library.

Other features of OTI/A include Knowledge Networks, Country Rooms, and an Activity Database. Knowledge Networks are spaces where discussions about a certain topic, or area of topics, can take place in OTI/A. Documents may also be uploaded. Country Rooms are a space within OTI/A to hold documents related to activities performed by OTI within that country. Lastly, the Activity Database is used to facilitate grant management. Because OTI manages thousands of activities under USAID’s GUC (Grants Under Contract) mechanism OTI must collect detailed project information to effectively manage its large and diverse portfolio of grants. Access to Knowledge Networks, Country Rooms, and the Activity Database is limited to OTI/A users with need to know.

#### 2.1.3 What is the SYSTEM STATUS?

- New System Development or Procurement
  - Pilot Project for New System Development or Procurement
  - Existing System Being Updated
  - Existing Information Collection Form or Survey
- OMB Control Number:

**2.1.3 What is the SYSTEM STATUS?**

<input type="checkbox"/> New Information Collection Form or Survey
<input type="checkbox"/> Request for Dataset to be Published on an External Website
<input type="checkbox"/> Other:

**2.1.4 What types of INFORMATION FORMATS are involved with the program?**

<input checked="" type="checkbox"/> Physical only
<input type="checkbox"/> Electronic only
<input type="checkbox"/> Physical and electronic combined

**2.1.5 Does your program participate in PUBLIC ENGAGEMENT?**

<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:
<input type="checkbox"/> Information Collection Forms or Surveys
<input type="checkbox"/> Third Party Web Site or Application
<input type="checkbox"/> Collaboration Tool

**2.1.6 What type of system and/or TECHNOLOGY is involved?**

<input type="checkbox"/> Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
<input type="checkbox"/> Network
<input checked="" type="checkbox"/> Database
<input checked="" type="checkbox"/> Software: Drupal
<input type="checkbox"/> Hardware
<input type="checkbox"/> Mobile Application or Platform
<input type="checkbox"/> Mobile Device Hardware (cameras, microphones, etc.)
<input type="checkbox"/> Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
<input type="checkbox"/> Wireless Network
<input type="checkbox"/> Social Media
<input type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input checked="" type="checkbox"/> Website or Webserver
<input type="checkbox"/> Web Application

<b>2.1.6 What type of system and/or TECHNOLOGY is involved?</b>
<input type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input checked="" type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input checked="" type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

<b>2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?</b>
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input checked="" type="checkbox"/> USAID employees and personal services contractors
<input checked="" type="checkbox"/> Employees of USAID contractors and/or services providers
<input type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input type="checkbox"/> Others:
<input type="checkbox"/> None

## 2.2 Information Collection, Use, Maintenance, and Dissemination

<b>2.2.1 What types of personal information do you collect, use, maintain, or disseminate?</b>
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input type="checkbox"/> Home Address
<input type="checkbox"/> Home Phone Number
<input type="checkbox"/> Personal Cell Phone Number
<input type="checkbox"/> Personal E-Mail Address
<input checked="" type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input checked="" type="checkbox"/> Employment or Salary Record
<input type="checkbox"/> Medical Record
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input type="checkbox"/> Education Record
<input checked="" type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input type="checkbox"/> Sex or Gender
<input type="checkbox"/> Age

<b>2.2.1 What types of personal information do you collect, use, maintain, or disseminate?</b>
<input type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo)
<input type="checkbox"/> Sexual Orientation
<input type="checkbox"/> Marital status or Family Information
<input type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input type="checkbox"/> Citizenship
<input type="checkbox"/> Other:
<input type="checkbox"/> No PII is collected, used, maintained, or disseminated

<b>2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?</b>
<input checked="" type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input type="checkbox"/> Form Data
<input checked="" type="checkbox"/> User Names
<input checked="" type="checkbox"/> Passwords
<input type="checkbox"/> Unique Device Identifier
<input type="checkbox"/> Location or GPS Data
<input type="checkbox"/> Camera Controls (photo, video, videoconference)
<input type="checkbox"/> Microphone Controls
<input type="checkbox"/> Other Hardware or Software Controls
<input checked="" type="checkbox"/> Photo Data
<input type="checkbox"/> Audio or Sound Data
<input type="checkbox"/> Other Device Sensor Controls or Data
<input type="checkbox"/> On/Off Status and Controls
<input type="checkbox"/> Cell Tower Records (logs, user location, time, date)
<input type="checkbox"/> Data Collected by Apps (itemize)

<b>2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?</b>
<input type="checkbox"/> Contact List and Directories
<input type="checkbox"/> Biometric Data or Related Data
<input type="checkbox"/> SD Card or Other Stored Data
<input type="checkbox"/> Network Status
<input type="checkbox"/> Network Communications Data
<input type="checkbox"/> Device Settings or Preferences (security, sharing, status)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

<b>2.2.4 Who owns and/or controls the system involved?</b>
<input checked="" type="checkbox"/> USAID Office:
<input type="checkbox"/> Another Federal Agency:
<input type="checkbox"/> Contractor:
<input checked="" type="checkbox"/> Cloud Computing Services Provider: Terremark (d/b/a Verizon – Enterprise Cloud Federal Edition)
<input type="checkbox"/> Third-Party Website or Application Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:

### 3 Privacy Risks and Controls

#### 3.1 Authority and Purpose (AP)

<b>3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?</b>
Section 491 of Foreign Assistance Act of 1961 (22 U.S.C. § 2151, as amended).



<b>3.1.2 Why is the PII collected and how do you use it?</b>
PII is collected from OTI/A users to populate OTI/A user profiles to facilitate communication, familiarization, and collaboration.

<b>3.1.3 How will you identify and evaluate any possible new uses of the PII?</b>
Not applicable. Personal information will not be used for reasons other than the purposes specified.

## 3.2 Accountability, Audit, and Risk Management (AR)

<b>3.2.1 Do you use any data collection forms or surveys?</b>
<input checked="" type="checkbox"/> No:
<input type="checkbox"/> Yes:
<input type="checkbox"/> Form or Survey (Please attach)
<input type="checkbox"/> OMB Number, if applicable:
<input type="checkbox"/> Privacy Act Statement (Please provide link or attach PA Statement)

<b>3.2.3 Who owns and/or controls the personal information?</b>
<input checked="" type="checkbox"/> USAID Office: DCHA/OTI
<input type="checkbox"/> Another Federal Agency:
<input type="checkbox"/> Contractor:
<input type="checkbox"/> Cloud Computing Services Provider:
<input type="checkbox"/> Third-Party Web Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:

<b>3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?</b>
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:

### 3.3 Data Quality and Integrity (DI)

#### 3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

Information is either collected by e-mail from the OTI/A user or directly inputted by the user into OTI/A. OTI project managers determine whether their staff needs an OTI/A account to perform their duties. If a team member requires access, he or she is asked by the program manager to voluntarily provide the information. Once provided, the program manager relays collected information to the OTI/A administrators via USAID.gov email. An account is created by the OTI/A administrator. Once the account is created, photos and OTI related employment experience can be voluntarily uploaded to user profile by the OTI/A user.

#### 3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?

All OTI/A user information is collected directly from the OTI/A user. The program manager has complete and up to date information to verify the information collected from his or her team. Once the OTI/A user's account is created, the OTI/A user can upload a photo, work phone, and employment information, as well as, update any other profile data populated by the OTI/A administrator.

#### 3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?

OTI conducts bi-annual quality control auditing, which involves program managers reviewing their team's OTI/A user accounts to ensure the information is accurate and up to date.

### 3.4 Data Minimization and Retention (DM)

#### 3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?

The minimum PII relevant and necessary for OTI/A is name and work e-mail.

#### 3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?

No.

Yes:

#### 3.4.4 What types of reports about individuals can you produce from the system?

OTI/A administrators have the ability to produce reports of OTI/A users and the sites which they have access.

**3.4.6 Does the system monitor or track individuals?**

*(If you choose Yes, please explain the monitoring capability.)*

No.

Yes:

**3.5 Individual Participation and Redress (IP)****3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?**

All personal information and PII, except name and work email, will be voluntarily provided by users. By default, only name, their organization (USAID Bureau/Office or Implementing Partner), and work email will be entered for all new accounts by the OTI/A site administrator. Users then choose to update their "member profile" with work phone, work cellular phone, photo, and OTI specific employment history in the form of previous work experience and professional interests.

**3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?**

A user has the ability to log in to their OTI/A account using their user name and password to edit their account.

**3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?**

OTI/A is hosted on Terremark (d/b/a Verizon – Enterprise Cloud Federal Edition) servers. Verizon Enterprise Cloud Federal Edition is FedRAMP certified. OTI/A gives users the ability to access and amend their PII.

**3.7 Transparency (TR)****3.7.1 Do you retrieve information by personal identifiers, such as name or number?**

*(If you choose Yes, please provide the types of personal identifiers that are used.)*

No.

Yes: By Name and work e-mail.

### 3.7.2 How do you provide notice to individuals regarding?

- 1) The authority to collect PII:
- 2) The principal purposes for which the PII will be used:
- 3) The routine uses of the PII:
- 4) The effects on the individual, if any, of not providing all or any part of the PII:

**OTI/A's Privacy Notice:**

"Thank you for visiting OTI/Anywhere, a project management and collaboration website supporting the global mission of the Office of Transition Initiatives. Your privacy and security are very important to us. Please be aware that OTI/Anywhere does not collect personal information when you visit our website, unless you choose to provide that information voluntarily. Additionally, any personal information you provide will not be shared outside of USAID, nor used for purposes other than creating and maintaining your user profile in OTI/Anywhere.

The authority for the Office of Transition Initiative comes from Section 491 of the Foreign Assistance Act of 1961, as amended. We would like to make you aware of a law that provides to you with certain rights concerning your personal information: the Privacy Act of 1974 (5 U.S.C. 552a, as amended). The Privacy Act of 1974 can be found [here](#)."

### 3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes: OPM/GOVT-1- General Personnel Records.

### 3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

Terremark (d/b/a Verizon – Enterprise Cloud Federal Edition) backs up OTI/A data to a known location.

## 3.8 Use Limitation (UL)

### 3.8.1 Who has access to the PII at USAID?

OTI/A administrators have access to the PII of all OTI/A users. OTI/A users have access to their own PII.

### 3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

Not applicable. PII is not shared outside of USAID.

**3.8.4 Do you share PII outside of USAID?  
If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?**

No.

Yes:

### **3.9 Third-Party Web Sites and Applications**

**3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?**

Not applicable. OTI/A does not engage with the public

## Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links
<input type="checkbox"/> None. There are no documents or links that I need to provide.
<input type="checkbox"/> Privacy Threshold Analysis (PTA)
<input type="checkbox"/> Privacy Impact Assessment (PIA)
<input type="checkbox"/> System of Records Notice (SORN)
<input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)
<input type="checkbox"/> Data Collection Forms or Surveys
<input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices
<input type="checkbox"/> USAID Web Site Privacy Policy
<input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application
<input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents