

Third Party Application Privacy Impact Assessment

Department of State Privacy Coordinator Sheryl Walter Bureau of Administration Global Information Services Office of Information Programs and Services	
Name of Third Party Application: innocentive.com ITAB Number: None Month and Year PIA was completed: 7/2013	

**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.

Innocentive.com is a web-based platform designed to advertise and host challenge competitions open to the public, and to relay applicant information to its clients in response to these challenges.

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

Public challenge competitions can provide a low-cost means to developing innovative solutions to problems well-known to Department of State employees and the arms control community. Innocentive.com has significant visibility within the “solver community¹” and is well-suited to advertise these challenges and organize the incoming information to enhance the Department of State’s decision making capabilities. These challenges assist in the Department’s mission by enhancing arms control treaty verification capabilities, making these agreements more useful, reliable, and enforceable, all of which are in the interest of the United States.

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

Yes, including but not limited to the President’s January 21, 2009 memorandum on Transparency and Open Government and the OMB Director’s December 8, 2009 Open Government Directive. These documents serve as the primary policies underlying the

¹ The “solver community” is Innocentive’s term for describing the group of eligible individuals and small companies willing to take on challenges such as this offering, and who are likely to frequent Innocentive.com in search of such opportunities.

Department's efforts to use the third-party websites or applications. In addition, the Department shall work closely with its counsel to ensure that its use of third-party websites and applications remains compliant.

The Department will comply with all applicable laws, regulations, and policies, including but not limited to: the Privacy Act of 1974, as amended; and Section 508 of the Rehabilitation Act of 1973 (codified at 29 U.S.C. § 794d).

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

These authorities include but are not limited to: the Privacy Act of 1974, as amended (applying to Innocentive in accordance with 5 USC §552a(m)(1) "Government Contractors"); the America COMPETES Reauthorization Act (15 U.S.C. §3719), and OMB M-10-11, Guidance on the Uses of Challenges and Prizes to Promote Open Government, March 8, 2010.

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

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

Applicants must supply to Innocentive full names, physical addresses, email addresses, and telephone numbers. Only the PII of successful applicants will be provided to the Department, and only after a decision has been made as to whether an application is successful or not. Additional information is requested from the winner only after a selection has been made.

(b) What are the sources of the PII?

PII is provided by the applicants upon registering through Innocentive.

(c) From which individuals is the information collected?

Innocentive collects this information on all applicants initially, but only the information of successful applicants is forwarded to the Department.

(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?

The April 7, 2010 OMB memorandum entitled, "Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act" stated that, "contests that permit respondents to create their own submissions are not covered by the PRA if no additional information is collected for the contest beyond what is necessary to contact the entrants." Therefore, this collection is not subject to PRA requirements.

3) Intended or expected use of PII

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

The Department will only use this PII in order to contact winning applicants, to arrange for payment and development of their proposed solutions, and for limited publicity purposes to advertise the challenge program.

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

If applicant X submits an application which is selected by the Department for a prize, Innocentive will, upon notice by the Department, provide access to the Program Manager through its secure website to applicant X's PII in order to contact him/her.

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?

PII will be disclosed to the Program Manager and, to the extent necessary and permissible, to Public Affairs for the purposes of promoting this program and its outcomes to the broader public. Innocentive will request of awardees receiving monetary prizes certain information that will be shared with the Internal Revenue Service (IRS), in order to comply with tax and other applicable laws. This information will include copies of positive identification documentation and a tax identification number, (often a Social Security number). This information will not be incorporated into the identifying account information that is stored by the Site, and Innocentive will request only such information that is reasonably necessary to comply with these legal obligations.

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

PII will only be transmitted through approved channels such as secure websites and Departmental email.

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

Access to Innocentive's information is password-protected, and any PII acquired through the challenge process will only be shared with duly authorized Department of State personnel. All relevant personnel will be advised of and abide by the following standard procedures for handling PII:

- Do not inspect, search, or browse records of PII in files or databases unless you are authorized to do so in the performance of your official duties and you have a need to do so to accomplish your assigned work.
- Do not alter or delete records containing PII unless it is necessary in the performance of your official duties.
- Do not copy records of PII to a non-government furnished computer.
- Do not disclose PII to others, including other authorized users, verbally or otherwise unless there is a need to do so in the performance of your official duties.

- Do not reveal your password to others or allow them to log on under your account.
- Do not leave your work area without first locking your computer.
- Do not store PII in shared electronic folders or shared network files.
- Do not email PII in an unencrypted form without first evaluating the potential harm to the individuals if their PII were exposed.
- Do not leave hard copy PII records exposed and subject to theft.

5) Maintenance and retention of PII

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

Records of winners from Innocentive will only be retained by the Department so long as is necessary (typically only a few months, with the exception of the winner's name). Should the relationship between the Department and the challenge winners develop into a contractual relationship for the development of their idea, rules and procedures related to contracting will take over at that time, but absent that relationship developing, all other PII will be discarded.

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

This activity falls outside the scope of existing records disposition schedules A-24-055-1 to A-24-055-26. Should AVC/VTT choose to proceed to enter into a contractual relationship with the winning application, one or more of these schedules would likely apply, but only to records produced as a result of the awarding of a contract for development of the winning proposal.

6) Securing PII

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

Yes. Methods include keeping reports in locations only accessible by those authorized to have such access as part of their official duties.

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

Department of State users access the system through a web-based user interface. Access to this system is password protected, and passwords are only available to those authorized to have such access as part of their official duties.

7) Identifying and mitigating other privacy risks

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

Mishandling of PII by Innocentive is possible; however the Department has worked closely with Innocentive in this and previous years to craft effective privacy policies for

the use of Innocentive's platform, and to present these policies clearly to the user before they agree to use the system.

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?

No.

(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 <http://foia.state.gov/Learn/SORN.aspx>).

If there is no existing Department SORN to cover this collection, one must be created. Please contact SornTeam@state.gov for guidance.

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

Notice is provided through this PIA, which will be published on the public Department of State website, as well as through the Innocentive platform, which sets out its terms of use and privacy policy when users register for the first time, and requires submitters to this challenge to agree to and acknowledge Innocentive's policies as well as the planned sharing of PII with the Department of State before users can provide their application information.