



Privacy Impact Assessment
for the
Coast Guard Art Program

DHS/USCG/PIA-027

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Abstract

The Department of Homeland Security (DHS) U.S. Coast Guard Art Program (COGAP) is an outreach tool for educating diverse audiences about the United States Coast Guard (USCG). COGAP relies on contributions and works of art provided by its members to tell the story of the service's missions, heroes, and history. This Privacy Impact Assessment (PIA) is being conducted because COGAP collects personally identifiable information (PII) from members of the public.

Introduction

COGAP has been in existence since 1981 and is co-sponsored by the USCG and the Salmagundi Club.¹ COGAP co-founder George Gray, himself an artist, was asked by the USCG to create an art program similar to one he had created for the United States Navy (Navy) when the Navy phased out its program in 1980. The Salmagundi Club worked closely with Gray to develop a framework for the art program, implement it, and provide valued artistic input on artists' applications. In May 1981, the USCG received its first annual collection. With few exceptions, COGAP continues to receive yearly collections from its members. These works are donated to the Salmagundi Club with the intention they be given to the USCG. At an annual acceptance ceremony taking place at the Salmagundi Club, the club's leadership conveys the art to the service and the service officially accepts the art.

Since COGAP's inception, the Salmagundi Club has provided invaluable support, artistic guidance, and administrative assistance. The Salmagundi Club has repeatedly served as the venue for the annual inaugural exhibitions and acceptance ceremonies as well as the site for other special events featuring USCG artists. The Salmagundi Club helps publicize COGAP events and exhibits, and provides logistical and administrative support, making these events possible. The Salmagundi Club's COGAP committee reviews samples of art submitted by applicants (who are members of the public) to determine if the applicant's abilities merit being accepted into the program.

COGAP uses fine art as an outreach tool for educating diverse audiences about the USCG. As a DHS component, showing the service's contributions to the nation underscores the Department's vital role in securing our country. Through displays at museums, libraries, and patriotic events, Coast Guard art tells the story of the service's missions, heroes, and history to the public. Art is also displayed in offices of members of Congress, senior officials of the executive branch, other military services facilities, and at USCG locations throughout the country.

Individuals seeking to become members of the art program voluntarily complete an application form via the Coast Guard website.

¹ The Salmagundi Club was founded in 1871 and is one of the oldest art organizations in the United States. The Salmagundi Club offers programs including art classes, exhibitions, painting demonstrations, and art auctions throughout the year for members and the public.



This application form requests the following information:

- Name;
- Address;
- Email;
- Website addresses;
- Phone numbers;
- Date and place of birth;
- Art education;
- Qualifications and experience; and
- Signature.

Applicants also submit images of samples of their artwork. If accepted as members, applicants are also asked if they would like their biographies posted to the Coast Guard website. If so, the following additional information is requested from the applicants:

- Current place of residence;
- Additional career highlights and honors; and
- Link to the artist's website, if there is one.

The applications are stored by the COGAP coordinator in locked file cabinets and the voluntary data provided is entered into a database that can be only accessed by the COGAP coordinator or others at the USCG with a need-to-know. This contact information is used to communicate with applicants/members. The biographies are posted only when the artists have provided written permission.

Applications, along with samples of the artists' work, are sent to the Salmagundi Club, which examines the submissions to determine if the applicant has the necessary ability to become a member.² Artists are notified in writing and email of this decision. If accepted as members, artists are able to opt in to having their biographies posted to the Coast Guard website.

Annually, artists who have become members are asked to submit one or more images of their works of art to the program. These submissions are reviewed by a jury to determine if the submission(s) are of sufficient quality to be accepted into the art program. The jury consists of members of the Salmagundi Club and Coast Guard leadership. The artists are notified in writing and by email on the acceptance or denial of their yearly submission(s). If the work is accepted, the

² No PII is shared with the Salmagundi Club during the applicant review process.



artist sends the original piece to the USCG, which has the works framed. Along with the art, the artist sends a letter offering his or her submissions to the USCG's permanent collection and the artist relinquishes all copyrights to the piece(s).

The annually accepted works go on view at the Salmagundi Club in New York City for roughly two weeks. There is a formal acceptance ceremony during this period when the art is officially accepted into the USCG by Coast Guard leadership. Artists can submit annually if they wish. Submission is not necessary for membership retention. However, artist members are asked to submit at least once every three years.

Fair Information Practice Principles (FIPPs)

The Privacy Act of 1974 articulates concepts of how the Federal Government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. The Homeland Security Act of 2002 Section 222(2) states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974.

In response to this obligation, the DHS Privacy Office developed a set of Fair Information Practice Principles (FIPPs) from the underlying concepts of the Privacy Act to encompass the full breadth and diversity of the information and interactions of DHS. The FIPPs account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure.

DHS conducts Privacy Impact Assessments on both programs and information technology systems, pursuant to the E-Government Act of 2002 Section 208 and the Homeland Security Act of 2002 Section 222. Given that U.S. Coast Guard Art Program is program rather than a particular information technology system, this PIA is conducted as it relates to the DHS construct of the FIPPs. This PIA examines the privacy impact of U.S. Coast Guard Art Program operations as it relates to the FIPPs.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a SORN and PIA, as appropriate. There should be no system the existence of which is a secret.

All of the information that the USCG collects is voluntarily submitted by the applicant or COGAP member. The USCG provides notice of this through the Privacy Act Statement on the COGAP application and allows members to opt in to sharing their PII/biography in association



with their art. The collection of this information is covered by the History of the Department of Homeland Security System of Records Notice (SORN).³

Additionally, the USCG provides further information on its website page dedicated to its art program.⁴

2. Principle of Individual Participation

Principle: DHS should involve the individual in the process of using PII. DHS should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of PII and should provide mechanisms for appropriate access, correction, and redress regarding DHS's use of PII.

All of the information submitted to DHS has been done so voluntarily and by the applicant or COGAP member. In addition, the USCG takes steps at each collection of information to ensure that individuals consent to have their PII available for the public to view in association with the art. Once accepted into the program, the applicant signs a legally-binding sharing agreement with the USCG in which they attest to the validity of the biographical data provided.

In the case of biographies of deceased artist members, information has been compiled from publicly available sources such as newspaper articles and funeral announcements.

As this information is submitted by the individuals, the USCG assumes that it is accurate. However, individuals are able to correct their information at any time by reaching out to the COGAP coordinator. Additionally, individuals seeking access to their information may submit a Privacy Act or Freedom of Information Act (FOIA) request in writing to USCG, Commandant (CG-611), 2703 Martin Luther King Jr Avenue, SE STOP 7710, Attn: FOIA Coordinator, Washington, D.C. 20593-7710. Individuals may also submit a request to EFOIA@uscg.mil. Individuals are also provided notification of the procedures to correct their information through the History of the Department of Homeland Security SORN.⁵

3. Principle of Purpose Specification

Principle: DHS should specifically articulate the authority which permits the collection of PII and specifically articulate the purpose or purposes for which the PII is intended to be used.

The COGAP program uses the information that is voluntarily submitted by an applicant for consideration for program membership. COGAP uses the contact information collected to communicate with applicants and the experience/qualifications, education information, and artwork to determine if the applicant has the necessary ability to become a COGAP member. If accepted, USCG uses contact information in order to continue communications with program members. If a member wants to have his or her biography on the USCG website, the USCG asks

³ DHS/All-027 The History of the Department of Homeland Security, 75 FR 8092 (February 23, 2010).

⁴ See <https://www.uscg.mil/Community/Art-Program/>.

⁵ DHS/All-027 The History of the Department of Homeland Security, 75 FR 8092 (February 23, 2010).



for additional information about the artists and requests permission in writing to post the information.

The COGAP information collected is only available and accessible to authorized COGAP personnel who have a need-to-know. The information provided by applicants is reviewed by the COGAP coordinator. The Salmagundi Club COGAP committee is only sent samples of the artist's work with no PII to determine if the applicant is qualified to become a member.

If the applicant is accepted into the program, the individual's information is stored in locked files and in a database run by the COGAP coordinator and not accessible to the public. The COGAP coordinator controls access to the database. In the case of artist biographies posted on the Coast Guard website, these are only posted with the permission of the artist. No contact information on individuals is posted on the Coast Guard website other than a link to the artists' website, if they have one.

4. Principle of Data Minimization

Principle: DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

COGAP only collects the minimal amount of information in order to communicate with the applicant and validate his or her credentials. All data associated with current applicants and historical data related to current and past members of the Coast Guard Art Program is maintained in accordance with the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information.⁶ Additionally, any external release of biographical data is done so with the artist's full knowledge and signed permission.

The information and paintings accepted from artists into COGAP will remain permanently within the Coast Guard collection.

Privacy Risk: There is a risk that records that contain PII may become lost or misplaced, or that USCG will retain the information for too long.

Mitigation: COGAP membership records will be retained in accordance with the National Archives and Records Administration (NARA)-approved record retention schedule once it is finalized. USCG is working with the Records Officer to finalize this retention schedule. Until that time, USCG is following the retention schedule of the History of the Department of Homeland

⁶ See <https://www.dhs.gov/sites/default/files/publications/dhs%20policy%20directive%20047-01-007%20handbook%20for%20safeguarding%20sensitive%20PII%2012-4-2017.pdf>.



Security SORN,⁷ which states that records relating to background material are to be destroyed when no longer needed for administrative purposes.

Although this information is being kept permanently, USCG has taken the proper safeguards to protect the information. All membership applications are kept in locked files and member contact information is kept on a database that only those with a need-to-know may access. The COGAP coordinator controls access to both. Additionally, the minimal amount of PII used and collected poses little harm to an individual if it were accessed inappropriately.

5. Principle of Use Limitation

Principle: DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.

The information provided by applicants and COGAP members is reviewed only by the COGAP program. No PII is shared with the Salmagundi Club during the applicant review process. Only samples of the artist's work are sent to determine if the applicant is qualified to become a COGAP member.

Contact information will not be shared with third-parties without the consent of artists selected for membership. Instances of when contact information might be shared is when COGAP members are sent invitations to Coast Guard events or invitations from organizations exhibiting Coast Guard art by member artists. The COGAP coordinator confirms that an artist wishes to have his or her address and contact information sent to a museum for publicity purposes and for mailing invitations. No information is shared with a museum until the member indicates if he or she wishes to share or not share.

The COGAP application clearly notes what information is collected (images of associated art) that will be shared externally for the purpose of application review. Upon acceptance into the program, artists are informed of the potential use or sharing of biographical data externally, if written consent is provided by the individual artist.

6. Principle of Data Quality and Integrity

Principle: DHS should, to the extent practical, ensure that PII is accurate, relevant, timely, and complete, within the context of each use of the PII.

All of the information that the USCG receives is voluntarily submitted by the applicant or COGAP member.⁸ As such, the USCG considers this information to be complete and accurate. If an individual believes there is inaccurate information submitted to the USCG, he or she may contact the COGAP coordinator at any time to resolve any discrepancies.

⁷ DHS/All-027 The History of the Department of Homeland Security, 75 FR 8092 (February 23, 2010).

⁸ However, in the case of deceased members, information has been compiled from publicly available sources such as newspaper articles and funeral announcements.



Privacy Risk: There is the risk of data entry error by the COGAP program when entering information into the database.

Mitigation: Although this risk is always a possibility, because PII is not a factor in determining an applicant's admission into the COGAP program, inaccurate PII carries minimal risk to an individual. The individual's art and qualifications are the deciding factors in determining admission. This risk is also mitigated as all USCG personnel who access COGAP data are trained using the USCG and DHS-approved privacy training courses regarding the proper handling and use of PII.

7. Principle of Security

Principle: DHS should protect PII (in all forms) through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

COGAP applicants' membership forms are kept in locked files and access to contact information in the database is controlled by the COGAP coordinator. Only those with a need-to-know are granted access. There are no mechanisms for outside individuals or entities to access the files or database, as it is on a secure DHS network.

8. Principle of Accountability and Auditing

Principle: DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

The PII collected through the COGAP application process is only seen by the Coast Guard personnel who work in the COGAP program. The applicants' membership forms are kept in locked files and access to contact information in the database is controlled by the COGAP coordinator.

Upon acceptance into the COGAP program, artists are informed of the potential use or sharing of biographical data externally. However, the artists are required to consent to this sharing. All transmissions of contact information to third-parties are done via encrypted PDF per USCG CIO Bulletin 16-003, *Implementation of Email File Filters*.

All Coast Guard personnel, to include the COGAP program, must complete annual mandated trainings titled, *Privacy at DHS: Protecting Personal Information* and *DHS Records Management for Everyone*.

Conclusion

The U.S. Coast Guard Art Program (COGAP) is an outreach tool for educating diverse audiences about the United States Coast Guard (USCG). It is co-sponsored by the Salmagundi Club, a New York City art and cultural institution. Artists seeking to become members of the art program ask for and voluntarily complete an application form and submit images of their artwork.



The images are evaluated by the Salmagundi Club and the USCG to determine if the applicant artistically qualifies for membership. The application form (and PII) is viewed solely by the COGAP coordinator and kept secured in a locked file along with images.

Artists are notified in writing and email on whether they have been accepted. If accepted as members, artists are able to opt in to having their biographies posted to the Coast Guard website. Only information approved by each artist is posted on the website.

COGAP ensures that only qualified artists are chosen as members and then assists in such matters as exhibitions and loans to Coast Guard leadership and other important borrowers. All members donate their art which becomes the property of the USCG. It is used to serve the USCG, public, museums, and any organizations involved in education and other public-minded activities. The art is never used or sold for profit.

Overall, the risks to the privacy of individuals are minimal. All information is voluntarily submitted to the USCG, and it is only made public when an artist opts in to having their PII presented with their artwork.

Responsible Officials

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U.S. Coast Guard
Department of Homeland Security

Approval Signature

Original, signed copy on file with the DHS Privacy Office.

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