



Office of Inspector General

REVIEW OF THE FEDERAL LABOR RELATIONS
AUTHORITY'S PRIVACY AND DATA SECURITY
POLICIES, PROCEDURES, AND PRACTICES FOR
FISCAL YEAR 2025

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YEAR 2025**

**Report No. MAR-25-06
APRIL 2025**

Federal Labor Relations Authority
1400 K Street, N.W., Washington, D.C. 20424

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Abbreviations

FLRA	Federal Labor Relations Authority
FY	Fiscal Year
OIG	Office of Inspector General
PII	Personally Identifiable Information

Review of the Federal Labor Relations Authority's Privacy and Data Security Policies, Procedures, and Practices for Fiscal Year 2025

Report No. MAR-25-06

April 15, 2025

The Honorable Colleen Duffy Kiko, Chairman

Dembo Jones, P.C. was engaged by the Federal Labor Relations Authority (FLRA) Office of Inspector General (OIG) to perform a privacy and data protection review for Fiscal Year (FY) 2025.

The objective was to perform a privacy and data protection review of FLRA's privacy and data security policies, procedures, and practices for FY 2025. A detailed description of our objective is below. This year's privacy and data protection review resulted in no new findings.

Executive Summary

Dembo Jones, P.C., on behalf of the FLRA, OIG, performed a Privacy and Data Protection Review in accordance with privacy and data protection-related laws and guidance (e.g., Privacy Act of 1974, Office of Management and Budget memorandums, Consolidated Appropriations Act of 2005, etc.). The Consolidated Appropriations Act of 2005, codified in relevant part at 42 U.S.C. § 2000ee-2, requires agencies to assign a Chief Privacy Officer who is responsible for identifying and safeguarding personally identifiable information (PII) and requires periodic OIG or OIG-contracted independent third-party review of agency use of PII and of its privacy and data protection policies and procedures.

There were no new findings in the current year; however, there were two findings from the prior FY privacy report, *Review of the FLRA's Privacy and Data Security Policies, Procedures, and Practices for FY 2024*, MAR-24-06. In a written management response, FLRA agreed with our prior recommendations. Based on the results of our review, we determined that a review was warranted in FY 2025, to include a follow-up on the FY 2024 report. Pursuant to that follow-up, we have determined that both prior recommendations contained in Report MAR-24-06 have been fully remediated and are considered closed.

Objective

The objective was to perform a privacy and data protection review of the Federal Labor Relations Authority Privacy and Data Security Policies, Procedures, and Practices for FY 2025. The purpose of our review was to perform the following:

Review of the Federal Labor Relation Authority's Privacy and Data Security Policies, Procedures, and Practices for Fiscal Year 2025 (Report No. MAR-25-06)

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- Conduct a review of the FLRA privacy and data security policies, procedures, and practices in accordance with regulations;
- Review FLRA’s technology, practices, and procedures with regard to the collection, use, sharing, disclosure, transfer and storage of information in identifiable form;
- Review FLRA’s stated privacy and data protection procedures with regard to the collection, use, sharing, disclosure, transfer, and security of personal information in identifiable form relating to FLRA employees and the public;
- Perform an analysis of FLRA’s intranet, network, and websites for privacy vulnerabilities (through review of source documents):
 - Noncompliance with stated practices, procedures, and policy;
 - Risks of inadvertent release of information in an identifiable form from the website of the agency; and
- Issue recommendations to management for improvements or enhancements of information in identifiable form, and the privacy and data protection procedures of the agency.

Background

Dembo Jones, P.C., on behalf of the FLRA, OIG, conducted an independent evaluation of the quality and compliance of the FLRA privacy program with applicable Federal information security laws and regulations.

The Privacy Act of 1974, 5 U.S.C. § 552a, regulates the use of personal information by the United States Government. Specifically, it establishes rules that determine what information may be collected and how information can be used in order to protect the personal privacy of individuals.

The Privacy Act applies to *Federal Government Agencies* and governs their use of a system of records, which is defined as “a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”¹

The following rules govern the use of a system of records:

- Publish in the Federal Register upon establishment or revision a notice of the existence and character of the system of records.
- No agency may disclose personal information to third parties without the consent of the individual (with some exceptions).
- No agency may maintain records on how an individual exercises their First Amendment rights (with some exceptions).
- Federal personal information records are limited only to data that is relevant and necessary.
- Individuals must have access to the records maintained about them by the Federal Government (with some exceptions).

¹ 5 U.S.C. § 552a(a)(5).

- Individuals must have the opportunity to request correction or amendment to any inaccuracies or incompleteness in their records.

Findings

There were no findings.

Dembo Jones, P.C.

North Bethesda, MD
April 15, 2025

Appendix

Report Distribution

The Honorable Susan Tsui Grundmann, Member
The Honorable Anne M. Wagner, Member
Michael Jeffries, Executive Director
Dave Fontaine, Director, Information Resources Management Division
Thomas Tso, Senior Agency Official for Privacy

Contacting the Office of Inspector General

If you know of fraud, waste, or misconduct
relating to an FLRA program, contract, or
employee, you may report it to the FLRA OIG
Hotline:

HOTLINE (877) 740-8278

[HTTP://WWW.FLRA.GOV/OIG-Hotline](http://www.flra.gov/OIG-Hotline)

CALL: (771) 444-5712 FAX: (202) 208-4535

WRITE: 1400 K Street, N.W.
Washington, D.C. 20424

When reporting information, you may choose to be confidential, which means the FLRA OIG will not disclose your identity without your consent, unless the Inspector General determines that such a disclosure is unavoidable during the course of an investigation. You may instead choose to be anonymous. Anonymous reports may limit our ability to process the information you provide as we would not be able to contact you for additional information or clarification. To learn more about the FLRA OIG, visit our website at: www.flra.gov/components-offices/offices/office-inspector-general



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