

| U.S. Consumer Product Safety Commission<br>PRIVACY IMPACT ASSESSMENT                                                                                                                                                                      |                                                   |                |                   |             |
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| Name of Project:                                                                                                                                                                                                                          | Public Financial Disclosure Forms SORN OGE/GOVT-1 |                |                   |             |
| Office/Directorate:                                                                                                                                                                                                                       | Office of General Counsel                         |                |                   |             |
| <b>A. CONTACT INFORMATION</b>                                                                                                                                                                                                             |                                                   |                |                   |             |
| Person completing PIA:<br>(Name, title, organization and ext.)                                                                                                                                                                            | Pamela Brinker, Attorney, OGC, X7840              |                |                   |             |
| System Owner:<br>(Name, title, organization and ext.)                                                                                                                                                                                     | Cheryl A. Falvey, General Counsel, OGC, X7642     |                |                   |             |
| System Manager:<br>(Name, title, organization and ext.)                                                                                                                                                                                   | Not Applicable – Not an Electronic System         |                |                   |             |
| <b>B. APPROVING OFFICIALS</b>                                                                                                                                                                                                             | <b>Signature</b>                                  | <b>Approve</b> | <b>Disapprove</b> | <b>Date</b> |
| System Owner                                                                                                                                                                                                                              | Cheryl A. Falvey, OGC                             | CAF            |                   | 5/3/10      |
| Privacy Advocate                                                                                                                                                                                                                          | Linda K Glatz<br>Linda Glatz, ITTP                | ✓              |                   | 5/5/10      |
| Chief Information Security Officer                                                                                                                                                                                                        | Patrick Manley<br>Patrick Manley, ITTS            | ✓              |                   | 5/12/10     |
| Senior Agency Official for Privacy                                                                                                                                                                                                        | Mary James<br>Mary James, Director, ITTP          | ✓              |                   | 5/13/10     |
| System of Record?<br>✓ Yes      No                                                                                                                                                                                                        |                                                   |                |                   |             |
| Reviewing Official:                                                                                                                                                                                                                       | Patrick D. Weddle<br>Patrick D. Weddle, AED, EXIT | ✓              |                   | 5/13/10     |
| <b>C. SYSTEM APPLICATION/GENERAL INFORMATION</b>                                                                                                                                                                                          |                                                   |                |                   |             |
| 1. Does this system contain any personal information about individuals?<br>(If there is <b>NO</b> information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.) | Yes.                                              |                |                   |             |
| 2. Is this an electronic system?                                                                                                                                                                                                          | No.                                               |                |                   |             |

| <b>D. DATA IN THE SYSTEM</b>                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <b>1. What categories of individuals are covered in the system?</b> (public, employees, contractors)                                                                                          | Both former and current employees in the following categories: officers and employees including special government employees, whose positions are classified above GS-15 of the General Schedule or at an equivalent rate of basic pay equal to or greater than 120% of the minimum rate of basic pay for GS-15; officers or employees in a position determined by the Director of the Office of Government Ethics to be of equal classification to GS-15 or above; excepted service employees in positions that are of a confidential or policymaking nature unless an employee or group of employees are exempted by the Director of the Office of Government Ethics; CPSC's primary designated agency ethics official; nominees for positions requiring Senate confirmation.                                                                                                                  |
| <b>2. Generally describe what data/information will be collected in the system.</b>                                                                                                           | Filer's name; financial information such as salary, dividends, retirement benefits, interests in property, deposits in a bank and other financial institutions; information on gifts received; information on certain liabilities; information about positions as an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any corporation, company, firm, partnership, or other business, non-profit organization, labor organization, or educational institution; information about non-Government employment agreements such as leaves of absence to accept Federal service, continuation of payments by a non-Federal employer; and information about assets placed in trust pending disposal. This record contains other information received in administering the Ethics of Government Act of 1978 or Ethics Reform Act of 1989, as amended. |
| <b>3. Is the source of the information from the individual or is it taken from another source? If not directly from individual, then what other source?</b>                                   | The information is taken from the individual.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>4. How will data be checked for completeness?</b>                                                                                                                                          | The accuracy and completeness of the data is reviewed by an ethics official.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>5. Is the data current?</b> (What steps or procedures are taken to ensure the data is current and not out-of-date?)                                                                        | Yes. The ethics officials track who needs to file and who has returned the data.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>6. Are the data elements described in detail and documented?</b> (If yes, what is the name and location of the document?)                                                                  | Yes. Standard Form 278, which is available on OGE's website.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>E. ATTRIBUTES OF THE DATA</b>                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?</b>                                                               | The data is relevant and necessary to comply with the Ethics in Government Act of 1978 and the Ethics Reform Act of 1989, as amended and to preserve and promote the integrity of the public officials.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>2. For electronic systems, if the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.</b>                                 | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>3. How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.</b> | The data can be retrieved by claimant's name.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?</b>                                                       | None.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## F. MAINTENANCE AND ADMINISTRATIVE CONTROLS

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| 1. What are the retention periods of data in this system?                                                                                                                   | In accordance with the National Archives and Records Administration General Records Schedule for ethics program records, these records are generally retained for a period of six years after filing, or for such other period of time as is provided for in that schedule for certain types of ethics records. Records filed by or in respect to a nominee for an appointment requiring confirmation by the Senate when the nominee is not appointed are generally destroyed one year after the individual ceased being under Senate consideration for appointment. However, if any records are needed in an ongoing investigation, they will be retained until no longer needed in the investigation. |
| 2. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented? | The records are destroyed by shredding and/or electronic deletion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.                                           | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?                                                                              | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?                                                      | No but it is identified as government wide SORN OGE/GOVT-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain                                                    | Not applicable. This system is not being modified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## G. ACCESS TO DATA

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| 1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).                                                                                                                                                                                    | The records are open to the public.                                                                                                                                                                                                  |
| 2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)                                                                                                                                                                            | The CPSC staff regularly undergoes ethics and privacy training and must adhere to the principles of ethical conduct which specify the appropriate and inappropriate use of government property and information by federal employees. |
| 3. Who is responsible for assuring proper use of the data?                                                                                                                                                                                                                                                     | Office of General Counsel.                                                                                                                                                                                                           |
| 4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Are contractors involved in the collection of the data? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed? | CPSC does not use contractors to use or maintain the system.                                                                                                                                                                         |
| 5. Do other systems share data or have access to the data in the system? If                                                                                                                                                                                                                                    | No.                                                                                                                                                                                                                                  |

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| yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?      |                                                                                                                                                                                                                                                                           |
| 6. Will other agencies share data or have access to the data in this system? If yes, how will the data be used by the other agency? | Office of Government Ethics reviews a selection of the forms on a random schedule to ensure compliance with the government ethics statutes and regulations. Department of Justice employees will have access to the records to assist with litigation involving the data. |
| 7. Will any of the personally identifiable information be accessed remotely or physically removed?                                  | The information may be accessed remotely by Department of Justice Employees or physically removed from CPSC and transferred to the Department of Justice as needed for litigation purposes. Department of Justice employees are subject to the Privacy Act requirements.  |