

U.S. Consumer Product Safety Commission PRIVACY IMPACT ASSESSMENT				
Name of Project:	Confidential Financial Disclosure Forms SORN OGE/GOVT-2			
Office/Directorate:	Office of General Counsel			
A. CONTACT INFORMATION				
Person completing PIA: (Name, title, organization and ext.)	Pamela Brinker, Attorney, OGC, X7840			
System Owner: (Name, title, organization and ext.)	Cheryl A. Falvey, General Counsel, OGC, X7642			
System Manager: (Name, title, organization and ext.)	Not Applicable – Not an Electronic System			
B. APPROVING OFFICIALS				
	Signature	Approve	Disapprove	Date
System Owner	Cheryl A. Falvey, OGC	CAC		5/3/10
Privacy Advocate	Linda Glatz, ITTP	✓		3/5/10
Chief Information Security Officer	Patrick Manley, ITTS	✓		5/12/10
Senior Agency Official for Privacy	Mary James	✓		4/4/10
System of Record? ✓ Yes No	Mary James, Director, ITTP			
Reviewing Official:	Patrick D. Weddle, AED, EXIT	✓		5/17/10
C. SYSTEM APPLICATION/GENERAL INFORMATION				
1. Does this system contain any personal information about individuals? (If there is NO 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.			

D. DATA IN THE SYSTEM

1. What categories of individuals are covered in the system? (public, employees, contractors)	Both current and former employees in the following categories: officers and employees in the executive branch whose position is classified at GS-15 or below of the General Schedule prescribed by 5 U.S.C. 5332, or the rate of basic pay for which is fixed, other than under the General Schedule and officers or employees in any other position determined by the Designated Agency Ethics Official to be of equal classification. All special Government employees as defined in 18 U.S.C. 202(a) and 5 CFR 2634.105(s) are required to file unless they are required to file public financial disclosure reports or their position has been excluded from filing.
2. Generally describe what data/information will be collected in the system.	The records contain employee's name and contact information and statements and amended statements of personal and family holdings and other interests in property; gifts reimbursements; liabilities; agreements and arrangements; outside positions; and other information related to conflict of interest determinations.
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?	The information is taken from the individual.
4. How will data be checked for completeness?	Ethics officials will review the forms for completeness.
5. Is the data current? (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.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	Yes. OGE Form 450, which can be found on OGE's website.

E. ATTRIBUTES OF THE DATA

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	The data is relevant and necessary to meet the requirements of or under Executive Orders 12674 as modified, 5 CFR 2634, agency regulations thereunder, as well as section 107 of the Ethics in Government Act of 1978, as amended. The reports help assure compliance with ethics laws and regulations and to determine if an actual or apparent conflict of interest exists between the employment of individuals by the Federal Government and their outside employment and financial interests.
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.	Not applicable.
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.	The data can be retrieved by claimant's name.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	None.

F. MAINTENANCE AND ADMINISTRATIVE CONTROLS

1. What are the retention periods of data in this system?	Generally, six years after filing. However, when filed by or with respect to a nominee for an appointment requiring confirmation by the Senate when the nominee is not appointed, the records are destroyed one year after the date the individual ceased being under Senate consideration for appointment. If records are needed for an ongoing investigation, they will be retained until no longer needed in the investigation.
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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?	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-2, Executive Branch Confidential Financial Disclosure Reports.
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

1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	Ethics officials, Office of Government Ethics employees and possibly Department of Justice Employees pursuant to routine uses under the Privacy Act for litigation.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	The CPSC ethics 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. Department of Justice Employees will only have access to the records as needed to pursue litigation and are subject to the Privacy Act requirements.
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 yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?	No.
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 pursuant to routine uses in the Privacy Act.
7. Will any of the personally identifiable information be accessed remotely or	The information may be accessed remotely by Department of Justice Employees or physically removed from CPSC and transferred to the Department of Justice as

physically removed?	needed for litigation purposes. Department of Justice employees are subject to the Privacy Act requirements.
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