

Office of Government Ethics

Privacy Impact Assessment for the Agency Resource Management Purchase Tracking System (ARMPTS)

August 2021
Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
Agency Resource Management Purchase Tracking System (ARMPTS)**

Provide electronic copies of the signed PIA to OGE's Chief Information Security Officer and Privacy Officer.

Name of Project/System: Agency Resource Management Purchase Tracking System (ARMPTS)

Office: Program Counsel Division

A. CONTACT INFORMATION:

1) Who is the person completing this document?

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2) Who is the system owner?

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3) Who is the system manager for this system or application?

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4) Who is the Chief Information Security Officer who reviewed this document?

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6) Who is the Reviewing Official?

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes. Individual information may pertain to an OGE employee (name and phone number), a commercial vendor point of contact (name, phone number, public vendor address, email), or other federal employee (name, phone number, government address, email).

a. Is this information identifiable to the individual?

Yes.

b. Is the information about individual members of the public?

Yes.

c. Is the information about employees?

Yes.

2) What is the purpose of the system/application?

The system serves as OGE's Purchase Request system for procurement of all required items and services. ARMPTS is designed for the pre and final approval of any purchase transaction and is used to place orders on purchase cards, Interagency Agreements, training requests, or contracts request purchases through OGE's contracting office-shared service provider Bureau of Fiscal Service (BFS). Requesters are able to

submit their purchase requests in ARMPTS. Requests are then routed through the CIO for IT-related items/services, to the responsible Division Head for an initial review and approval, followed by the Chief of Staff/Program Counsel (if over the micro-purchase limit), to the Budget Officer for funds certification, and finally to the card holder or procurement office for fulfillment. There are at least two mandatory approvers on each purchase request though other roles (CIO, HRO, and Branch Chief) are available as well.

3) What legal authority authorizes the purchase or development of this system/application?

P.L. 112-194, the Government Charge Card Abuse Prevention Act of 2012; Appendix B to Circular No. A-123; 31 U.S.C. chapter 15; 41 U.S.C. § 1909; Chief Financial Officers Act of 1990 (P.L. 101-576); Competition in Contracting Act of 1984; Federal Acquisition Streamlining Act of 1994; Federal Acquisition Reform Act of 1995; Federal Acquisition Regulation (FAR).

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

OGE employees, other federal agency employees, employees of public businesses.

2) What are the sources of the information in the system?

The information is provided by the individuals themselves or through information from a commercial vendor.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

The PII in the system is provided by the individuals themselves or through information from a commercial vendor.

b. What federal agencies provide data for use in the system?

N/A.

c. What State and local agencies are providing data for use in the system?

N/A.

d. From what other third party sources will data be collected?

N/A.

e. What information will be collected from the employee and the public?

Information collected includes name, work telephone number, email address, public address (commercial vendors).

3) Accuracy, Timeliness, Reliability, and Completeness

a. How will data collected from sources other than OGE records be verified for accuracy?

Through publically accessible sources or SAM.gov or the individual concerned.

b. How will data be checked for completeness?

OGE relies on individuals and vendors to provide complete information.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?

The data is current but can become outdated as vendors change. It is not intended that the data be updated over time; it is a historical record of purchase transactions.

d. Are the data elements described in detail and documented?

No. However, the data elements are simple and self-explanatory.

D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes.

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No.

3) Will the new data be placed in the individual's record?

N/A.

4) Can the system make determinations about employees/the public that would not be possible without the new data?

N/A.

5) How will the new data be verified for relevance and accuracy?

N/A.

6) If the data is being aggregated, what controls are in place to protect the data from unauthorized access or use?

N/A.

7) If data is being aggregated, are the proper controls remaining in place to protect the data and prevent unauthorized access?

N/A.

8) How will the data be retrieved? Does a personal identifier retrieve the data?

Data is retrieved by name, Division, item description, cost, purchase request number, date, fiscal year, status, and cardholder.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

Various reports can be accessed containing relevant information to readily identify specific purchase requests. There are reports by Division; by Requestor; by Status; by cardholder; By OGE Number; PRs by OGE Number; By BFS Req. Number; By BFS PO Number; PRISM Requisitions; Pending Requests; by Requestor; Approved; Need HR action; by Fiscal Year; completed by requestor Cardholder Monthly; completed by requestor Cardholder flat; completed by requestor Incremental Payments; by reconciliation flat; recurring Expiring purchases; recurring now expiring recurring purchases; Completed Requests; completed by requestor; cancelled requests.

The various reports are used by employees, supervisors, the Budget Officer, and Approving Officials to view relevant information as it pertains to a purchase request or any other relevant information. ARMPTS is accessible to all OGE employees but not to OGE contractors.

10) What opportunities do individuals have to decline/refuse to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses)?

None. If the information is not provided, the purchase will not be completed.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

N/A.

- 2) Is the data in the system covered by existing records disposition authority? If yes, what are the retention periods of data in this system?**

Yes, GRS 1.1, Item 010. Purchase transaction records are required to be maintained for a period of 6 years and then can be destroyed.

- 3) 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?**

Timely destruction of federal records is the responsibility of the OGE Records Officer, in accordance with OGE's records destruction guidance. The reports are temporary and will be destroyed after 6 years, if they are no longer needed by the agency.

- 4) Is the system using technologies in ways that the OGE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No.

- 5) How does the use of this technology affect public/employee privacy?**

The use of the application should not have any measurable impact on public or employee privacy. The information in the application regarding the public is all publically available elsewhere.

- 6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

No.

- 7) What kinds of information are collected as a function of the monitoring of individuals?**

N/A.

- 8) What controls will be used to prevent unauthorized monitoring?**

Technical controls are in place to enforce role-based editing of specific information. Employees (but not contractors) have access to all of the data since agency purchases are transparent and available as a semi-internal control for fraud, waste and abuse.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

Only the training request module is covered by the Privacy Act, and it is covered by OPM/GOVT-1.

10) If the system is being modified, will the Privacy Act system of records notice (SORN) require amendment or revision? Explain.

The system of records notice does not require amendment or revision.

F. ACCESS TO DATA:

1) Who will have access to the data in the system?

All OGE employees (but not contractors) have access to all of the data since agency purchases are transparent and available for review.

2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access to OGE applications is governed by the Account Access Request Form (AARF) process, which authorizes the Information Technology Division (ITD) to create, modify, and disable network accounts, including providing access to OGE applications. AARF requests must be signed by the employee, his/her supervisor, and the Chief Information & Cybersecurity Officer before a request is approved to be implemented by ITD staff.

3) Will users have access to all data on the system or will the user's access be restricted? Explain.

All OGE employees (except contractors) have access to all of the data.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Authorized users have been advised that agency policy prohibits them from unauthorized browsing of data and have been instructed not to engage in such activities. Technical controls are in place to enforce role-based editing of specific information.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

No contractors were involved with the design, development, or maintenance of the system.

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

Yes. Specific data in ARMPTS can be copied directly to the Budget Formulation for Fiscal Year (BuFFY) application.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

Authorized users are responsible for using the interface according to agency policy.

- 8) Will other agencies share data or have access to the data in this system (Federal, State, or Local)?**

The data in this system is provided to specific employees at BFS (budget analysts or accountants) in order for them to provide the services for which OGE contracts.

- 9) How will the data be used by the other agency?**

To record purchases approved and maintain expense reports and accounting procedures.

- 10) Who is responsible for assuring proper use of the data?**

Each authorized user is responsible for assuring proper use of the data.

See Attached Approval Page

**The Following Officials Have Approved the
PIA for the Employee Administrative Records System:**

1) System Manager

Gilbert Carlson 8/22/2021
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2) System Owner

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