

Office of Government Ethics

Privacy Impact Assessment for the Ethics Agreement Tracking System (EATS)

March 2025
Compliance Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
Ethics Agreement Tracking System**

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

Name of Project/System: Ethics Agreement Tracking System (EATS)

Office: Compliance Division

I. EXECUTIVE SUMMARY

EATS allows OGE to track compliance with the commitments made in nominee ethics agreements by individuals entering into Presidential appointments requiring Senate confirmation (PAS) in order to resolve potential conflicts of interest. These records are maintained to document PAS employees’ attestation as to whether they have complied with the requirements of their ethics agreements.

OGE sends the certification of ethics agreement compliance form to the appropriate agency ethics official via email when a Presidential nominee is confirmed by the Senate. Then the PAS employee is required to complete the form and return it by the deadline. OGE staff enter the relevant information into EATS. The certifications of ethics agreement compliance forms are posted to OGE’s website.

II. CONTACT INFORMATION:

A. Who is the person completing/updating this document?

Jennifer Matis
Privacy Officer
jmatis@oge.gov
202-482-9216

B. Who is the system owner?

Compliance Division
Dale A. Christopher
Deputy Director for Compliance
dachrist@oge.gov
202-482-9224

C. Who is the system manager for this system or application?

Stephanie C. Bonhomme
Chief, Program Review Branch
sbonhomme@oge.gov

202-482-9288

D. Who is the Chief Information Security Officer who reviewed this document?

Ty Cooper
Chief Information & Cybersecurity Officer
jtcooper@oge.gov
(202) 482-9226

E. Who is the Senior Agency Official for Privacy who reviewed this document?

Diana J. Veilleux
Senior Agency Official for Privacy
Chief, Legal, External Affairs and Performance Branch
Diana.veilleux@oge.gov
(202) 482-9203

F. Who is the Reviewing Official?

Ty Cooper
Chief Information & Cybersecurity Officer
jtcooper@oge.gov
(202) 482-9226

III. SYSTEM APPLICATION/GENERAL INFORMATION:

A. Does this system contain any information about individuals?

Yes, it contains financial information and information on current or former positions held. It also contains assignment information pertaining to OGE staff.

1) Is this information identifiable to the individual?

Yes.

2) Is the information about individual members of the public?

No.

3) Is the information about employees?

Yes, it includes information about individuals who are serving in Presidential appointments requiring Senate confirmation. The information may remain in the system after the individuals are no longer in their positions. It also contains assignment information pertaining to OGE staff.

B. What is the purpose of the system/application?

EATS allows OGE to track compliance with the commitments made in nominee ethics agreements by individuals entering into Presidential appointments requiring Senate confirmation (PAS) in order to resolve potential conflicts of interest. These records are maintained to document PAS employees' attestation as to whether they have complied with the requirements of their ethics agreements.

C. What legal authority authorizes the purchase or development of this system/application?

The Ethics in Government Act of 1978, as amended, authorizes the Director of OGE to provide overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive agency. See 5 U.S.C. app. § 402(a). OGE's regulation at 5 CFR part 2634 subpart H sets forth the requirements for ethics agreement compliance. The system supports those functions.

IV. DATA in the SYSTEM:

A. What categories of individuals are covered in the system?

Individuals who are confirmed to Presidential appointments requiring Senate confirmation.

B. What are the sources of the information in the system?

The Personally Identifiable Information (PII) in the system is provided by the individuals on their financial disclosure report (OGE Form 278e), ethics agreement, and/or their certification of ethics agreement compliance. Some of this information is uploaded into EATS by the user and some is transferred directly from another OGE system, the Financial Disclosure Tracking System (FDTS). Users add additional information (non-PII) about the administration of the program, such as the date reminder emails sent to the appointees' agency. Information is also drawn from the U.S. Senate's publicly available website announcing the dates of confirmation of PAS officials. Assignment information is entered by OGE officials.

C. 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 obtained directly from the individual and indirectly from the individual through FDTS.

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

N/A.

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

N/A.

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

Some of the data is collected from the U.S. Senate's publicly available website announcing the dates of confirmation of PAS officials.

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

Information on financial assets, financial transactions, current and former positions held, and ethics agreement compliance is collected from PAS nominees and appointees. No other information is collected from the public.

V. Accuracy, Timeliness, Reliability, and Completeness

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

The purpose of the system is to ensure that OGE receives complete information from the individual on their ethics agreement compliance. Accordingly, the OGE staff using the system will check the data for accuracy as part of OGE's business process.

B. How will data be checked for completeness?

The purpose of the system is to ensure that OGE receives complete information from the individual on their ethics agreement compliance. Accordingly, OGE staff using the system will check the data for completeness as part of OGE's business process.

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

OGE staff using the system ensure that the data is kept current based on information reported to OGE from the individual.

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

No. However, most of the substantive data elements are derived from specific forms submitted by the individuals.

VI. ATTRIBUTES OF THE DATA:

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

Yes.

B. 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?

Yes.

C. Will the new data be placed in the individual's record?

Some information uploaded into EATS (the full compliance date and the OGE notified date) will be shared with FDTS, making it accessible internally to OGE staff as part of the individual's financial disclosure profile or "record" in FDTS.

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

No, however, the system provides information about ethics agreement compliance that would not otherwise be reported in a similar format.

E. How will the new data be verified for relevance and accuracy?

The information is self-reported by the particular individual.

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

N/A.

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

N/A.

H. How will the data be retrieved? Does a personal identifier retrieve the data?

Data is retrieved by personal identifier, status, agency, and/or other data elements.

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

EATS can produce reports indicating who has submitted their required certifications timely, who submitted a certification in a given fiscal year quarter, and which certifications are due in a given fiscal year quarter. These reports will be used to provide statistical data on the number of certifications due and submitted. They will also be used to keep track of certifications due so that OGE can follow-up with PAS officials who are delinquent in submitting their certification. All users will have access to these reports.

J. 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)?

Individuals do not have any opportunity to decline to provide the information or to consent to particular uses of the information.

VII. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

A. 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.

B. 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, they are covered by General Records Schedule 2.8. The records are destroyed at the same time as the employee's last related public financial disclosure report is destroyed (generally six years from receipt by the agency) or when no longer needed for active investigation, whichever is later. Longer retention is authorized if needed for business use.

C. 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 Records Officer. The reports are temporary and will be destroyed when they are no longer needed by the agency.

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

No.

E. How does the use of this technology affect public/employee privacy?

The public financial disclosure reports, ethics agreements, and certifications of ethics agreement compliance from which the PII in the system originates are all publicly available documents. Therefore, the system will not have a significantly new impact on the privacy interests of the individuals whose data is in the system.

F. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

No.

G. What kinds of information are collected as a function of the monitoring of individuals?

N/A.

H. What controls will be used to prevent unauthorized monitoring?

N/A.

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

The certification information is subject to OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records. The assignment information is subject to OGE/INT-8, Employee Personnel Files Not Covered by Other Notices. EATS will display a Privacy Act statement referencing OGE/INT-8.

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

N/A.

VIII. ACCESS TO DATA:

A. Who will have access to the data in the system?

Authorized OGE employees will have access to the data in the application.

B. 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 Officer before a request is approved to be implemented by ITD staff.

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

Authorized users will have access to all data in the system.

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

In accordance with the OGE AARF process, only authorized users will have access to the information. In addition, 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.

- E. 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.

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

Some of the information (full compliance date and OGE notified date) will be shared with FDTS.

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

N/A.

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

No.

- I. How will the data be used by the other agency?**

N/A.

- J. 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 Ethics Agreement Tracking System:

1) System Manager

Name:

Stephanie C. Bonhomme

Title: Chief, Program Review Branch

2) System Owner

Name: Dale A. Christopher

Title: Deputy Director for Compliance

3) Chief Information Officer

Name: Ty Cooper

Title: Chief Information Officer & Cybersecurity Officer

4) Senior Agency Official for Privacy

Name: Diana Veilleux

Title: Chief, Legal, External Affairs and Performance Branch