

Office of Government Ethics

Privacy Impact Assessment for the Performance Awards Management Application (PAM)

January 2022
Program Counsel Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the
Performance Awards Management (PAM) Application**

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

Name of Project/System: Performance Awards Management (PAM)
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?

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

Ty Cooper
Chief Information & Cybersecurity Officer
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5) Who is the Senior Agency Official for Privacy who reviewed this document?

Diana J. Veilleux
Senior Agency Official for Privacy

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6) Who is the Reviewing Official?

Ty Cooper
Chief Information & Cybersecurity Officer
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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, position title, grade/step, branch, type of award, amount of award). Form AD-287-2 (Recommendation and Approval of Awards) will be used as a format for data input. Employee Social Security Numbers (SSN) will NOT be collected to identify the employee in this application.

a. Is this information identifiable to the individual?

Yes.

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

No.

c. Is the information about employees?

Yes.

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

The application serves as a tool to increase the efficiency of processing year-end performance awards for OGE General Schedule (GS) employees. Data will be input directly by OGE supervisors/managers regarding recommended year-end performance awards for routing/approval through Division Heads to the Program Counsel and Chief of Staff for final approval. PAM is designed for the pre and final approval of all year-end performance awards excluding Special Act awards submitted during the performance period. Supervisors are able to submit their year-end performance award recommendations in PAM. Recommendations are then routed to the responsible Division Head for initial review and approval to the Program Counsel and Chief of Staff for final approval. There are at least two mandatory approvers on each award recommendation.

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

5 U.S.C. sections 4302, 4503 & 4505a; 5 CFR 451.104

C. DATA in the SYSTEM:

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

OGE employees.

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

The information is provided by the OGE employee's supervisor.

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 is provided by the OGE employee's supervisor.

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

Only OGE.

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

None.

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?

See above.

3) Accuracy, Timeliness, Reliability, and Completeness

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

No other sources of relevant data will be used for this application.

b. How will data be checked for completeness?

The OGE employee's supervisor is responsible to ensure the accuracy and completeness of the information provided.

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. The OGE employee's supervisor is responsible to ensure the data is current and not out-of-date.

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?

No.

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?

Data is not being aggregated.

- 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 award recipient name, Branch, Division, or fiscal year.

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

Year-end performance award amounts by fiscal year. PAM is only accessible by the Budget Officer, Chief of Staff, Branch Chiefs, Division Heads, and the Director. Branch Chiefs and Division Heads can only view the information pertaining to their own subordinates.

- 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)?**

The OGE employees whose performance awards are being entered into the application are not providing their own information, and have no opportunity to consent to particular uses of the information.

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. Per GRS 2.2, Item 030, Employee Incentive Award Records: Destroy when 2 years old or 2 years after award is approved or disapproved, whichever is later, but longer retention is authorized if required for business use.

- 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. The reports are temporary and will be destroyed when they are no longer needed

by the agency. Emails generated by the application are subject to a 90-day auto delete policy.

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 have a minimal impact on employee privacy and no impact on public privacy. The information is necessary to process performance awards and will be maintained with appropriate safeguards.

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?

The application does not have the capability to monitor individuals.

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

OPM/Government-2.

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?

The application will be restricted to the Budget Officer, Chief of Staff, Branch Chiefs, Division Heads, and the Director. The Branch Chiefs and Division Heads only have access to the information about their own subordinates.

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 an access 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.

The application will be restricted to the Budget Officer, Chief of Staff, Branch Chiefs, Division Heads, and the Director. The Branch Chiefs and Division Heads only have access to the information about their own subordinates.

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 they have been instructed not to engage in such activities. In addition, security controls are in place to prevent unauthorized browsing.

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 application.

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

No.

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

N/A.

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

No.

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

N/A.

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 Performance Award Management Application:**

1) System Manager

Electronic
Signature:

Name: Gilbert Carlson
Title: Budget Officer

2) System Owner

Electronic
Signature:

Name: Shelley K. Finlayson
Title: Program Counsel and Chief of Staff

3) Chief Information Officer

Electronic
Signature:

Name: Ty Cooper
Title: Chief Information & Cybersecurity Officer

4) Senior Agency Official for Privacy

Electronic
Signature:

Name: Diana Veilleux
Title: Chief, Legal, External Affairs and Performance Branch and Senior Agency Official
for Privacy