

Office of Government Ethics

Privacy Impact Assessment for the OGE Officials' Individual Disclosures Search Collection System

June 2025

General Counsel and Legal Policy Division

**U.S. Office of Government Ethics (OGE)
Privacy Impact Assessment (PIA) for the OGE
Officials' Individual Disclosures Search Collection System**

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

Name of Project/System: OGE Officials' Individual Disclosures Search Collection System
Office: General Counsel and Legal Policy Division

I. EXECUTIVE SUMMARY:

The OGE Officials' Individual Disclosures Search Collection System is designed to provide members of the public with an easy, transparent means for obtaining access to certain records that are covered by the Ethics in Government Act of 1978 and maintained by OGE. The automated submission and response system significantly reduces the administrative burden and cost of retrieving and photocopying records in order to provide access to records by members of the public and other stakeholders.

There are three main functions of the system:

First, the system publishes to OGE's public website certain records that OGE is authorized to make public without limitation. These records include public financial disclosure reports for filers in positions on Level I or II of the Executive Schedule, ethics agreements, and certifications of ethics agreement compliance. The system also publishes information (but not the records themselves) regarding executive branch employees who have received a conflict-of-interest waiver pursuant to 5 U.S.C. 208. These records are available on OGE's website without the need for submission of a request for records.

Second, the system permits the public to submit a request (OGE Form 201) to receive copies of records pursuant to 5 U.S.C. 13107 and/or the public disclosure requirements in 5 CFR § 2634.603. These records include most other public financial disclosure reports maintained by OGE and all certificates of divestiture issued to executive branch officials.

Third, the system automates much of the process of responding to such requests. When a request is received, the system will validate certain elements of the request, retrieve the requested records from the agency's Financial Disclosure Tracking System (FDTS), and match the requested records to the appropriate records in FDTS. If the system cannot make a confident match, it will display the potential match on a report so that an authorized OGE staff person can review and confirm the match. Once the requested records are matched to the appropriate records in FDTS, the requested records are sent to the requester via email.

As noted above, the OGE Officials' Individual Disclosures Search Collection System is integrated with FDTS, which is where ethics records are managed and tracked as part of OGE's business processes. The Privacy Impact Assessment for FDTS is available on OGE's website.

II. CONTACT INFORMATION:

A. Who is the person completing this document?

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B. Who is the system owner?

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

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

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E. Who is the Privacy Officer who reviewed this document?

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F. Who is the Reviewing Official?

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III. SYSTEM APPLICATION/GENERAL INFORMATION:

A. Does this system contain any information about individuals?

Yes.

1. Is this information identifiable to the individual?

Yes, it includes financial disclosure information about nominees to Senate-confirmed Presidential appointee (PAS) positions, candidates to Presidential and Vice Presidential positions, and certain other executive branch officials. It also includes certain other ethics records and information about individuals who have received a conflict of interest waiver. This information may remain in the system after the individuals are no longer in their positions. Finally, it includes information about individuals who submit a Request for an Individual's Ethics Documents.

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

Yes, see above.

3. Is the information about employees?

Yes, see above.

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

The purpose of the OGE Officials' Individual Disclosures Search Collection System is to provide members of the public with an easy, transparent means for requesting and receiving copies of certain records that are covered by the Ethics in Government Act of 1978 and maintained by OGE. The automated submission and response system significantly reduces the administrative burden and cost of retrieving and photocopying requested records.

As noted above, the OGE Officials' Individual Disclosures Search Collection System is integrated with FDTS, which is where ethics records are managed and tracked as part of OGE's business processes. The Privacy Impact Assessment for FDTS is available on OGE's website.

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

The Ethics in Government Act of 1978, as amended, governs the filing of public financial disclosure reports and ethics agreements, as well as OGE's role in that process. See 5 U.S.C. 13105. It also 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. 13122(a). OGE's regulation at 5 CFR part 2634 subpart H sets forth the requirements for ethics agreements, which are approved by OGE as part of the nominee financial disclosure process.

OGE is authorized to issue certificates of divestiture pursuant to 26 U.S.C. 1043 and OGE's regulation at 5 CFR part 2634 subpart J. Finally, OGE's regulation at 5 CFR part 2640 subpart C requires agencies to consult with OGE when practicable before granting waivers to the financial conflict of interest prohibitions of 18 U.S.C. § 208. See 18 U.S.C. 208(d)(2); 5 CFR § 2640.303.

IV. DATA in the SYSTEM:

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

Members of the public under consideration for nomination to PAS positions, federal appointees and employees, former federal appointees and employees, Presidential and Vice Presidential candidates, and members of the public who submit requests for ethics records through the system.

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

Most of the personally identifiable information (PII) in the system is provided by the individuals on their financial disclosure reports (OGE Form 278e or OGE Form 278T), draft ethics agreement, certification of ethics agreement compliance (through OGE's Ethics Agreement Tracking System or EATS), and/or request for certificate of divestiture. The waiver information in the system is provided by agency ethics officials, who in turn obtain the information from the individual seeking the waiver.

The information on individuals who submit requests for ethics records is submitted by the requesters themselves through the system's public interface. Most of the information collected from requesters is mandated by the Ethics in Government Act.

1. 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?

See above.

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

As described above, information concerning certificates of divestiture and conflict of interest waivers may be provided by the agency ethics officials of any executive branch agency and the White House.

3. What State and local agencies provide data for use in the system?

None.

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

None.

5. What information is collected from the employee and the public?

See above.

D. Accuracy, Timeliness, Reliability, and Completeness

1. How is data collected from sources other than OGE records be verified for accuracy?

Individuals are responsible for the accuracy of the information that is provided to OGE directly or on their behalf both in connection with their own ethics records and in Requests for an Individual's Ethics Documents. Regarding the information provided in Requests for an Individual's Ethics Documents, the system validates the request for errors and holds nonconforming requests for manual review.

2. How is data checked for completeness?

OGE staff using the FDTs system check the financial disclosure, certificate of divestiture, and ethics agreement data for completeness as part of OGE's business process. Staff in OGE's Compliance Division check the certification of ethics agreement compliance data for completeness as part of their business process. With regard to information provided in Requests for an Individual's Ethics Documents, the public interface validates that the required fields have been completed before a requester can submit a request.

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

OGE staff keep the data regarding financial disclosure and ethics compliance up to date as part of OGE's business processes. The information submitted through the public interface is historical.

4. 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.

V. 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. The system provides a more efficient means for the public to obtain documents and information that must be made publicly available by law and regulation. The data collected and maintained within the system are relevant and necessary to this purpose.

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?

The system aggregates the information collected from several sources but does not create new or previously unavailable data.

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

N/A.

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

N/A.

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

N/A.

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

Access to the internal portion of the application is limited to authorized users. See below for further information about OGE's access controls. Authorized users have been advised that agency policy prohibits them from unauthorized use of data and have been instructed not to engage in such activities.

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

Data is retrieved by name, agency, and/or other data elements.

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

Authorized users can produce reports on the instances in which an individual's ethic documents were requested and produced in response to a Request for an Individual's Ethics Documents. Public users do not have access to reports. There are no reports available on documents accessed via direct download, without a Request for an Individual's Ethics Documents.

I. 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.

VI. 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, the completed Requests for an Individual's Ethics Records are covered by General Records Schedule 2.8. item 0010. The retention period is temporary. The requests are to be destroyed when the requested report is destroyed (see General Records Schedule 2.8 item 063). This disposition instruction is mandatory.

The records pulled from FDTS (e.g. reports, ethics agreements, etc.) are maintained in FDTS and their disposition authorities are covered in the Privacy Impact Assessment for that system.

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, pursuant to OGE's records management policies. Data is automatically deleted from the OGE Officials' Individual Disclosures Search Collection System in accordance with the disposition schedule for the respective record. The system 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 use of the system does not affect privacy more than necessary. The ethics information in the system is required to be made public by law and regulation. Users must manually designate which documents in FDTS will be available to publish to the website. The system only collects the minimum information necessary from requesters. Additionally, the system replaces prior systems with fewer security controls.

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 systems of records notice does the system operate? Provide number and name.

OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records.

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

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

VII. ACCESS TO DATA:

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

Only authorized OGE employees have access to the data in the internal portion of the application. In the public-facing portion of the application, requesters seeking access to ethics records in the system can access them either directly from OGE's website or by submitting an OGE Form 201.

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

Access to the internal portion of the application is limited to authorized OGE users only. 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, their supervisor, and the

Chief Information Officer before a request is approved to be implemented by ITD. Access to the public-facing portion of the application is unrestricted.

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

Authorized OGE users will have access to all data on the system. Note that only a few OGE staff are authorized to access the internal portion of the system. Access to the public-facing portion of the application is unrestricted.

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

Access to the internal portion of the application is limited to authorized users. See above for further information about OGE's access controls. Authorized users have been advised that agency policy prohibits them from unauthorized use of data and have been instructed not to engage in such activities. Access to the public-facing portion of the application is unrestricted.

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.

As discussed above, most of the data in the system is retrieved from OGE's Financial Disclosure Tracking System (FDTS) and made accessible to the public on OGE's public website (www.oge.gov).

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

The system owner, in conjunction with the CIO and the SAOP, is responsible for protecting the privacy rights of the public and employees affected by the interface.

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 OGE Officials' Individual Disclosures Search Collection System:**

1) System Owner and Manager

Name: Megan V. Granahan

Title: Chief, Incumbent Financial Disclosure Branch

2) Chief Information Officer

Name: Ty Cooper

Title: Chief Information Officer & Cybersecurity Officer

3) Privacy Officer

Name: Jennifer Matis

Title: Privacy Officer