The subject of this PIA is which of the following?
Minor Application (child)

Identify the Enterprise Performance Lifecycle Phase of the system.
Development

Is this a FISMA-Reportable system?
No

Does the system include a Website or online application available to and for the use of the general public?
No

Identify the operator.
Agency

Is this a new or existing system?
New

Does the system have Security Authorization (SA)?
No

Indicate the following reason(s) for updating this PIA.

Describe the purpose of the system.
The Health Resources and Services Administration Ethics Reporting Database (HERD) houses Ethics Program data and documents that have been housed in Excel logs and a shared drive. The database allows for storage of ethics forms, reports, and advice all in one place and allows HRSA Ethics Program staff to run reports on employee compliance with HRSA Ethics Program requirements. The reports also provide information on HRSA's compliance with the Departmental Ethics Program requirements. The Ethics Program is a preventative program that requires certain agency employees to file financial disclosure and outside activity reports, as well as request prior approval for certain types of outside activities. The forms used for these purposes, as well as correspondence regarding them and ethics rules/regulations inquiries, are stored in this database. Many of the program requirements have regulatory deadlines and employee and staff actions must be monitored to ensure those deadlines are being met. The reporting capabilities of this system allow for that monitoring activity.

Describe the type of information the system will collect, maintain (store), or share.
The database collects and stores employee ethics data, such as dates of interaction with program staff and when and how employees met compliance requirements of the HRSA Ethics Program. The system houses documents submitted by employees for review/approval, as well as advice provided by the HRSA Ethics Program staff to agency employees. Forms and reports stored in the system or with links in the system to them include the (Office of Government Ethics) OGE Form 278 Public Financial Disclosure Report, 450 Confidential Financial Disclosure Report, HHS 520 Request for Approval of Outside Activity, HHS 521 Annual Report of Outside Activity and 18 USC 208(b)(3) conflict of interest waivers and recusals notifications.

These documents collect employee information including name; position; address; phone number; e-mail; supervisor name and contact information; salary and grade information; descriptions of financial holdings of employee, spouse, and dependent children; sources of income; outside financial relationships; other outside relationships with non-Federal entities and individuals; and advice based on ethics statutes and regulations that have been provided to employees by HRSA Ethics staff.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

The system is a database, searchable by HRSA Ethics Program staff. It houses all HRSA Ethics Program data and documents relative to HRSA employees and their compliance with the agency ethics program. The system has reporting capabilities for ethics program compliance monitoring. Forms and reports stored in the system or with links in the system to them include the OGE Form 278 Public Financial Disclosure Report, 450 Confidential Financial Disclosure Report, HHS 520 Request for Approval of Outside Activity, HHS 521 Annual Report of Outside Activity and 18 USC 208(b)(3) conflict of interest waivers and recusals notifications. These documents collect employee information including name; position; address; phone number; e-mail; supervisor name and contact information; salary and grade information; descriptions of financial holdings of employee, spouse, and dependent children; sources of income; outside financial relationships; other outside relationships with non-Federal entities and individuals; and advice based on ethics statutes and regulations that have been provided to employees by HRSA Ethics staff. The documents stored in the system are maintained as individual ethics folders for each HRSA employee. Most of the financial disclosure reports are actually stored in systems maintained by the HHS Office of General Counsel and the Office of Government Ethics. The HERD maintains links to those other systems so the HRSA Ethics staff can quickly retrieve the ethics forms in those system while working all within the HERD. The HERD collects data for those systems for compliance reporting purposes. Agency employee ethics records are required to be maintained for six years before being destroyed. HERD also purges documents that are no longer required to be maintained by the (National Archives and Records Administration) NARA records schedule governing Executive Branch Ethics records.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name
E-Mail Address
Mailing Address
Phone Numbers
Financial Accounts Info
Legal Documents
Employment Status
Foreign Activities

Indicate the categories of individuals about whom PII is collected, maintained or shared.
  Employees
  special government employees (SGE)

How many individuals' PII is in the system?
  500-4,999

For what primary purpose is the PII used?
  Primarily, the PII is being used for employee identification, ethics analysis, filing compliance, and data collection.

Describe the secondary uses for which the PII will be used.
  Secondarily, the PII will be used for training and research purposes.

Identify legal authorities governing information use and disclosure specific to the system and program.
  The legal authority governing information use and disclosure specific to the system and program is 5 CFR 2638: Office of Government Ethics and Executive Agency Ethics Program Responsibilities.

Are records on the system retrieved by one or more PII data elements?
  Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.
  OGE/GOVT-2 - Executive Branch Confidential Financial Disclosure Reports
  OGE/GOVT-1 - Executive Branch Personnel Public Financial Disclosure Reports and Other Name-

Identify the sources of PII in the system.
  Directly from an individual about whom the information pertains
    In-Person
    Hardcopy
    Email
    Online
    Other

Government Sources
  Within OpDiv
  Other Federal Entities

Non-Governmental Sources
Identify the OMB information collection approval number and expiration date
OMB No.3209-001

Is the PII shared with other organizations?
Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Within HHS
The PII is shared and disclosed with the Office of General Counsel (OGC), for compliance and auditing purposes; with the Office of the Inspector General (OIG), for potential investigations; with the Health Resources and Services Administration (HRSA) Office of Human Resources, for on-boarding pre-clearance purposes and for possible administrative actions due to potential violations of ethics rules; and with the Ethics Program Operating Division (OPDIV) when an employee is in service at that OPDIV.

Other Federal Agencies
U.S. Office of Government Ethics (OGE), for compliance and auditing purposes; Other Federal Agencies when employee is in service at that agency.

Describe any agreements in place that authorizes the information sharing or disclosure.
No PII information is being shared outside of HHS, therefore no MOU or ISA is required.

Describe the procedures for accounting for disclosures.
PII will not be disclosed to any requesting person unless authorized by law, in accordance with the OGE/GOVT-2 executive branchwide Privacy Act system of records.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.
The Office of Government Ethics (OGE) collects data directly from the individual using Electronic Financial Disclosure System (EFDS). All forms that the HERD application collects contain a privacy act statement designed to inform individuals of the collection and use of their information.

All documents and reports being uploaded into the system contain the Privacy Act notice, the method by which individuals are being informed their personal information is being collected. Privacy Act Statement: Title I of the Ethics in Government Act of 1978 (5 U.S.C. App.), Executive Order 12674 (as modified by Executive Order 12731), and 5 CFR Part 2634, Subpart I, of the Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this form is for review by Government officials of your agency, to determine compliance with applicable Federal conflict of interest laws and regulations. Additional disclosures of the information on this report may be made: (1) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation; (2) to a court or party in a court or Federal administrative proceeding if the Government is a party or in order to comply with a judge-issued subpoena; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; (6) to the Department of Justice or in certain legal proceedings when the disclosing agency, and employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (7) to reviewing officials in a new office, department or agency when an employee transfers from one covered position to another, (8) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record, and (9) to contractors and other
non-Government employees working for the Federal Government to accomplish a function related to an OGE Government wide system of records. This confidential report will not be disclosed to any requesting person unless authorized by law. See also the OGE/GOVT-2 executive branch wide Privacy Act system of records.

Is the submission of PII by individuals voluntary or mandatory?
Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

There is no option to object to the collection of information on the forms stored in this system as it is required by regulation.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

Individuals are informed when they submit the information that this information will be stored in the system and that it will be used for legitimate purposes to avoid conflict of interest. No other notification or consent beyond this is required.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

There is no process, as individuals are notified at the time they submit the information stored in this system that it will be used for legitimate purposes and it will not be disclosed unless authorized by law.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

Ethics staff will periodically review PII found in the system and will make necessary updates to ensure PII is accurate and up-to-date. Ethics staff will ensure PII is not improperly or inadvertently modified or destroyed, available when needed, and sufficiently accurate for the purposes needed. Any outdated, unnecessary, irrelevant, incoherent, and inaccurate PII will be removed from the system.

Identify who will have access to the PII in the system and the reason why they require access.

Users:
System Users require access to PII data in order to review and analyze employee compliance.

Administrators:
System Administrators require access to PII for audit purposes as well as system maintenance.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

A user submits a request for system access to the system administrator. The administrator makes a determination as to what PII data the user has access to based on their job title and role.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

No system control limits are required since all staff in HRSA Ethics Program need access to all parts of database in order to perform key job functions as ethics officials; these include review and analysis of ethics reports and requests.
Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

All personnel that will use the system would have taken the IT Security Awareness and Records Management Training.

Describe training system users receive (above and beyond general security and privacy awareness training).

N/A

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

No

Describe the process and guidelines in place with regard to the retention and destruction of PII.

The process and guidelines in place with regard to the retention and destruction of PII follow the National Archives and Records Administration (NARA) General Records Schedule 25, requiring all records to automatically be deleted after 6 years.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

HERD relies on network security controls provided by the contractor and HRSA managed through GSS.(General Support System) The HERD implements firewalls, network and host base intrusion detection to secure its facilities. Boundary entry points are controlled by firewall rules and protected by Intrusion Detection Servers to prevent unauthorized access.