

Integrity - Office of the General Counsel	Version 2.0
Privacy Impact Assessment	06/02/2025



Privacy Impact Assessment Integrity

**Office of the General Counsel (OGC)
Office of the Chief Information Officer (OCIO)**

**Version 2.0
06/02/2025**

Template Version 2.5 (03/2025)

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Document Revision History

Date	Version	PIA Name/Description	Author
06/02/2025	2.0	Integrity – updated POC table	OGC / OCIO Oasis Systems, LLC
05/12/2025	DRAFT of 2.0	Integrity – updated POC table	OGC / OCIO Oasis Systems, LLC
11/15/2023	1.0	Integrity - Office of General Counsel	OGC / OCIO Oasis Systems, LLC
10/25/2023	DRAFT	Integrity - Draft Release	OGC / OCIO Oasis Systems, LLC

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The agency is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below help determine any privacy risks related to the E-Government Act or later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST).

Name/System/Subsystem/Service Name: Integrity.

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform): Integrity is owned by the U.S. Office of Government Ethics (OGE) and hosted in the U.S. Department of Agriculture (USDA) Digital Infrastructure Services Center (DISC) Government Community Cloud.

Date Submitted for review/approval: June 23, 2025.

1 Description

1.1 Provide the description of the system/subsystem, technology (i.e., Microsoft Products), program, or other data collections (hereinafter referred to as “project”). Explain the reason the project is being created.

Integrity is a secure, controlled-access, web-based information system created by the U.S. OGE for the executive branch of the U.S. Federal Government for electronically filing and reviewing public financial disclosure reports. The system is used to collect, manage, process, and store financial disclosure information from select members of the public in anticipation of nomination by the President and approval by the Senate and certain federal employees. Authorized agency ethics officials use the collected data to identify and resolve potential conflicts of interest between an employee's official duties and his or her private financial interests and affiliations.

OGE contracted with the U.S. Department of Agriculture (USDA) DISC, formerly known as the USDA National Information Technology Center (NITC), to host Integrity in a secure cloud environment. The USDA DISC is a federally owned Cloud Service Provider (CSP) authorized by the Federal Risk and Authorization Management Program (FedRAMP).

Please mark appropriate response below if your project/system will involve the following:

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Artificial Intelligence (AI)
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Public Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> Internal Website
<input type="checkbox"/> Cloud Service Provider	<input checked="" type="checkbox"/> Other: Government Community Cloud-based system owned by OGE
<input type="checkbox"/> Server/Database Design	

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1.2 Does this privacy impact assessment (PIA) support a proposed new project, proposed modification to an existing project, or other situation? Select options that best apply in table below.

Mark appropriate response.

Status Options	
<input type="checkbox"/>	New system/project
<input type="checkbox"/>	Modification to an existing system/project. <i>If modifying or making other updates to an existing system/project, provide the ADAMS ML of the existing PIA and describe the modification.</i>
<input checked="" type="checkbox"/>	Annual Review <i>If making minor edits to an existing system/project, briefly describe the changes below.</i> The PIA has been transferred into the latest template and updated POC list.
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

Role	Contact Information Name Office/Division/Branch Phone Number
Project Manager(s)	Jay Hosseini Office of the Chief Information Officer (OCIO) / Governance & Enterprise Management Services Division (GEMSD) / Architecture, Portfolio, & Investment Branch (APIB)/Project Management Team (PMT) 301-415-0021
System Owner/Data Owner or Steward	Tison Campbell Office of the General Counsel / Legislation, Ethics, and Administrative Law 301-287-9290
ISSM	Jonathan Butler Office of the Chief Information Officer (OCIO)/ Cyber and Infrastructure Security Division (CISD) 301-415-2560
Executive Sponsor	Tison Campbell Office of the General Counsel / Legislation, Ethics, and Administrative Law 301-287-9290
Other	Business Project Manager: Meghan Creedon Office of the General Council (OGC)/ Legislation, Rulemaking, and Agency Administration (LRAA)/ Legislation, Ethics, and Administrative Law (LEAL) 301-287-9158

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2 Authorities and Other Requirements

2.1 What specific legal authorities and/or agreements permit the collection of information for the project?

Provide all statutory and regulatory authorities for operating the project, including the authority to collect the information; NRC internal policy is not a legal authority. Please mark appropriate response in table below.

Mark with an "X" on all that apply.	Authority	Citation/Reference
<input checked="" type="checkbox"/>	Statute	Ethics in Government Act of 1978 (EIGA) as amended, 5 U.S.C. §101, 103(1) The Stop Trading on Congressional Knowledge Act of 2012 ("STOCK Act"), Pub. L. No. 112-105, 125 Stat. 191, 298-99 (2012), as amended
<input checked="" type="checkbox"/>	Executive Order	Executive Order 12674 (April 12, 1989), as modified by Executive Order 12731 (October 17, 1990)
<input checked="" type="checkbox"/>	Federal Regulation	5 C.F.R. Part 2634 5 C.F.R Part 2635 5 C.F.R. Part 2638 5 C.F.R. Part 5801.102
<input checked="" type="checkbox"/>	Memorandum of Understanding/Agreement	Memorandum of Acknowledgements between the U.S. OGE & the Nuclear Regulatory Commission (ML15352A085)
<input type="checkbox"/>	Other (summarize and provide a copy of relevant portion)	

2.2 Explain how the information will be used under the authority listed above (i.e., enroll employees in a subsidies program to provide subsidy payment).

The purpose of this executive branch-wide system is to electronically collect, manage, process, measure, and store reported financial and related information used in the OGE Form 278e and the OGE Form 278-T. Authorized OGE and NRC users will use the collected information to identify, prevent, and resolve conflicts of interest in accordance with Ethics in Government Act of 1978 (EIGA).

If the project collects Social Security numbers, state why this is necessary and how it will be used.

N/A.

3 Characterization of the Information

In the table below, mark the categories of individuals for whom information is collected.

Category of individual	
<input checked="" type="checkbox"/>	Federal employees
<input type="checkbox"/>	Contractors
<input checked="" type="checkbox"/>	Members of the Public (any individual other than a federal employee, consultant, or contractor)
<input type="checkbox"/>	Licensees
<input type="checkbox"/>	Other

In the table below, is a list of the most common types of PII collected. Mark all PII that is collected and stored by the project/system. If there is additional PII not defined in the table below, a comprehensive listing of PII is provided for further reference in ADAMS at the following link: [PII Reference Table](#).

Categories of Information			
<input checked="" type="checkbox"/>	Name	<input type="checkbox"/>	Resume or curriculum vitae
<input type="checkbox"/>	Date of Birth	<input type="checkbox"/>	Driver's License Number
<input type="checkbox"/>	Country of Birth	<input type="checkbox"/>	License Plate Number
<input type="checkbox"/>	Citizenship	<input type="checkbox"/>	Passport number
<input type="checkbox"/>	Nationality	<input type="checkbox"/>	Relatives Information
<input type="checkbox"/>	Race	<input type="checkbox"/>	Taxpayer Identification Number
<input type="checkbox"/>	Home Address	<input type="checkbox"/>	Credit/Debit Card Number
<input type="checkbox"/>	Social Security number (Truncated or Partial)	<input type="checkbox"/>	Medical/health information
<input type="checkbox"/>	Sex (Male or Female)	<input type="checkbox"/>	Alien Registration Number
<input type="checkbox"/>	Ethnicity	<input type="checkbox"/>	Professional/personal references
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Criminal History
<input type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Biometric identifiers (facial images, fingerprints, iris scans)
<input type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Emergency contact e.g., a third party to contact in case of an emergency
<input type="checkbox"/>	Personal Mobile Number/Home Number	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	<i>Other agency, business address, and official email address. Filers using the system provide their official position title and reportable personal financial information.</i>
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

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3.1 Describe how the data is collected for the project. (i.e., NRC Form, survey, questionnaire, existing NRC files/ databases, response to a background check).

The purpose of this executive branch-wide system is to electronically collect, manage, process, measure, and store reported financial and related information used in the OGE Form 278e and the OGE Form 278-T. Authorized OGE and NRC users will use the collected information to identify, prevent, and resolve conflicts of interest in accordance with Ethics in Government Act of 1978 (EIGA).

3.2 If using a form (paper or web) to collect the information, provide the form number, title and/or a link to the form.

The forms that are used to collect information are the OGE Form 278e ([OGE Form 278e](#)) and the OGE Form 278-T ([OGE Form 278-T](#)).

3.3 Who provides the information? Is it provided directly from the individual or a third party.

The information is provided by the individual.

3.4 Explain how the accuracy of the data collection is validated. If the project does not check for accuracy, please explain why.

All information about a subject individual will be provided by the subject individual. Individual users are responsible for ensuring the information they enter is accurate and are required to certify to the accuracy of the information. The system will generate an error message and highlight incomplete required fields.

3.5 Will PII data be used in a test environment? If so, explain the rationale for this and how the PII information is protected.

N/A.

3.6 What procedures are in place to allow the subject individual to correct inaccurate or erroneous privacy information?

All the information about a subject individual will be provided by the subject individual when they submit the OGE Form 278e or 278-T. Individuals are able to make corrections to the data if necessary.

4 Data Security

4.1 Describe who has access to the data in the project (i.e., internal NRC, system administrators, external agencies, contractors, public).

Only system-registered, authorized users will be granted access to the system. The system will be used by OGC who will manage accounts and roles for other NRC users who are required to use Integrity to file public financial disclosure reports.

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4.2 If the project/system shares information with any other NRC systems, identify the system, what information is being shared and the method of sharing.

Integrity does not share information with other NRC systems.

4.3 If the project/system connects, receives, or shares information with any external non-NRC partners or systems, identify what is being shared.

OGE owns and maintains the system and has access to system information.

If so, identify what agreements are in place with the external non-NRC partner or system in the table below.

Agreement Type	
<input type="checkbox"/>	Contract Provide Contract Number:
<input type="checkbox"/>	License Provide License Information:
<input checked="" type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU: Memorandum of Acknowledgements between the U.S. OGE & the Nuclear Regulatory Commission (ML15352A085)
<input type="checkbox"/>	Other
<input type="checkbox"/>	None

4.4 Describe how the data is accessed and describe the access control mechanisms that prevent misuse.

OGE is responsible for ensuring physical controls are implemented and in place to mitigate the privacy risks for unauthorized access. Electronic controls, such as multi-factor authentication, are in place to protect the data. Access to the system is controlled. Access to system information is role-based. Executive branch agencies control their users' access to information. Only users who are registered with credentials at MAX.gov or use PIV/CAC card can access the system. Detailed information regarding system security controls is documented in the agency's Integrity System Security Plan.

The data view is role-based. Only certain roles have access to the filer's data. Agencies using the system appoint agency role assignment administrators who assign users roles (e.g., filer, reviewer, group administrator) in the system.

4.5 Explain how the data is transmitted and how confidentiality is protected (i.e., encrypting the communication or by encrypting the information before it is transmitted).

A system user's information is encrypted when in transit using the highest available level of encryption currently supported by web browsers.

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4.6 Describe where the data is being stored (i.e., NRC, Cloud, Contractor Site).

Integrity is hosted by the USDA DISC in a secure cloud environment. The USDA DISC is a FedRAMP authorized cloud service provider.

4.7 Explain if the project can be accessed or operated at more than one location.

No. The system is hosted in a U.S. Government Community Cloud.

4.8 Can the project be accessed by a contractor? Have the contractors completed an IT-II investigation? Do they possess an NRC badge?

Yes. Contractors are involved in the design and development of this system. Contractors sign Confidentiality and Non-Disclosure Agreements. No they do not possess an NRC badge.

In addition, OGE's Privacy Act System of Records includes a routine that allows agencies, including OGE, to disclose information to contractors performing or working on a contract for the federal government, when necessary, to accomplish an agency function related to the System of Records Notice.

4.9 Explain the auditing measures and technical safeguards in place to prevent misuse of data.

Integrity system components, including operating system, database, and application components, generate audit logs. Auditing is configured in accordance with FISMA and NIST requirements.

4.10 Describe if the project has the capability to identify, locate, and monitor (i.e., trace/track/observe) individuals.

No, Integrity does not have the capacity to identify, locate, and monitor individuals.

4.11 Define which FISMA boundary this project is part of.

OGE issued an Authorization to Operate (ATO) for Integrity on October 15, 2024. NRC authorized Integrity as a subsystem of Third-Party System (TPS) on November 17, 2021. Both agencies perform independent security assessments for their systems annually.

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4.12 Is there an Authority to Operate (ATO) associated with this project/system?

Authorization Status	
<input type="checkbox"/>	Unknown
<input type="checkbox"/>	No <i>If no, please note that the authorization status must be reported to the Chief Information Security Officer (CISO) and Computer Security Organization (CSO's) Point of Contact (POC) via e-mail quarterly to ensure the authorization remains on track.</i>
<input type="checkbox"/>	In Progress provide the estimated date to receive an ATO. Estimated date:
<input checked="" type="checkbox"/>	Yes OGE issued an Authorization to Operate (ATO) for Integrity on October 15, 2024. NRC authorized Integrity as a subsystem of Third-Party System (TPS) on November 17, 2021. Both agencies perform independent security assessments for their systems annually. Indicate the data impact levels (Low, Moderate, High, Undefined) approved by the Chief Information Security Officer (CISO) Confidentiality-Moderate Integrity-Moderate Availability-Moderate

4.13 Provide the NRC system Enterprise Architecture (EA)/Inventory number. If unknown, contact [EA Service Desk](#) to get the EA/Inventory number.

Integrity is a subsystem of TPS; EA number is 20180002.

5 Privacy Act Determination

5.1 Is the data collected retrieved by a personal identifier?

Mark the appropriate response.

Response	
<input checked="" type="checkbox"/>	Yes, the PII is retrieved by a personal identifier (i.e., individual's name, address, SSN, or other unique number, etc.) List the identifiers that will be used to retrieve the information on the individual. <i>The data is retrievable by a filer's name, date, and/or form type (e.g., OGE Form 278e, OGE Form 278-T).</i>
<input type="checkbox"/>	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project.

5.2 For all collections where the information is retrieved by a personal identifier, the Privacy Act requires that the agency publish a System of Record Notice (SORN) in the Federal Register. As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some other personal identifier assigned to the individual.

Mark the appropriate response in the table below.

Response	
<input checked="" type="checkbox"/>	Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html) Provide the SORN name, number, (List all SORNs that apply): Government-wide, OGE/GOVT-1 SORN.
<input type="checkbox"/>	SORN is in progress
<input type="checkbox"/>	SORN needs to be created
<input type="checkbox"/>	Unaware of an existing SORN
<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

5.3 When an individual is asked to provide personal data (i.e., form, webpage, survey), is a Privacy Act Statement (PAS) provided?

A Privacy Act Statement is a disclosure statement required to appear on documents used by agencies when an individual is asked to provide personal data. It is required for any forms, surveys, or other documents, including electronic forms, used to solicit personal information from individuals that will be maintained in a system of records.

Mark the appropriate response.

Options	
<input checked="" type="checkbox"/>	Privacy Act Statement
<input type="checkbox"/>	Not Applicable
<input type="checkbox"/>	Unknown

5.4 Is providing the PII mandatory or voluntary? What is the effect on the individual by not providing the information?

Yes, it is mandatory to provide PII. Filers are required to report all requested information on the OGE Form 278e or OGE Form 278-T in order to satisfy reporting requirements.

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6 Records and Information Management-Retention and Disposal

The National Archives and Records Administration (NARA), in collaboration with federal agencies, approves whether records are **Temporary** (eligible at some point for destruction/deletion because they no longer have business value) or **Permanent** (eligible at some point to be transferred to the National Archives because of historical or evidential significance). Records/data and information with historical value, identified as having a “permanent” disposition, are transferred to the National Archives of the United States at the end of their retention period. All other records identified as having a “temporary” disposition are destroyed at the end of their retention period in accordance with the NARA Records Schedule or the General Records Schedule.

These determinations are made through records retention schedules and NARA statutes (44 United States Code (U.S.C.), 36 Code of Federation Regulations (CFR)). Under 36 CFR, agencies are required to establish procedures for addressing Records and Information Management (RIM) requirements. This includes strategies for establishing and managing recordkeeping requirements and disposition instructions before approving new electronic information systems or enhancements to existing systems.

The following questions are intended to determine whether the records/data and information in the system have approved records retention schedules and disposition instructions, whether the system incorporates RIM strategies including support for [NARA's Universal Electronic Records Management \(ERM\) requirements](#), and if a mitigation strategy is needed to ensure compliance.

If the project/system:

- Does not have an approved records retention schedule and/or
- Does not have an *automated* RIM functionality,
- Involves a cloud solution,
- And/or if there are additional questions regarding Records and Information Management - Retention and Disposal, please contact the NRC Records staff at ITIMPolicy.Resource@nrc.gov for further guidance.

If the project/system has a record retention schedule or an automated RIM functionality, please complete the questions below.

6.1 Does this project map to an applicable retention schedule in NRC's Comprehensive Records Disposition Schedule (NUREG-0910), or NARA's General Records Schedules?

<input type="checkbox"/>	NUREG-0910, “NRC Comprehensive Records Disposition Schedule
<input checked="" type="checkbox"/>	NARA's General Records Schedules
<input type="checkbox"/>	Unscheduled

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6.2 If so, cite the schedule number, approved disposition, and describe how this is accomplished.

System Name (include sub-systems, platforms, or other locations where the same data resides)	Integrity
Records Retention Schedule Number(s)	<p>GRS 2.8 – Employee Ethics Records GRS 2.8 item 060 – Public financial disclosure reports. Reports for individuals filing in accordance with the Ethics in Government Act...and not subsequently confirmed by the U.S. Senate.</p> <p>GRS 2.8 item 061 – Public financial disclosure reports. All other reports.</p> <p>GRS 2.8 item 062 – Public financial disclosure reports. Periodic transaction reports.</p>
Approved Disposition Instructions	See entries below for schedule numbers/titles and disposition instructions.
Is there a current automated functionality or a manual process to support RIM requirements? This includes the ability to apply records retention and disposition policies in the system(s) to support records accessibility, reliability, integrity, and disposition.	Integrity is owned by the U.S. Office of Government Ethics (OGE) and it is responsible for the retention of the data.
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	<p>PIA Template (03-2021) - 13 -</p> <p>A filer's data for the OGE Form 278e public financial disclosure reports and related records maintained in the system is identified for deletion from the system in compliance with section 105(e)(2)(d) of EIGA (5 U.S.C. app.): 1 year after the date the individual withdraws or otherwise is no longer under consideration for a Presidentially appointed, Senate-confirmed position, or 6 years after the year the report was received for other filers, or when no longer needed for active investigation, whichever is later. Filer's data related to the OGE Form 278-T Periodic Transaction Reports, mandated by the Stop Trading on Congressional Knowledge Act (STOCK Act) of 2012, is to be deleted from the system usually when 7 years old, when the related (subsequent) OGE Form 278e which they support is deleted from the system, or when no longer needed for active investigation, whichever is later.</p> <p>Certain information about individuals such as</p>

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	name, executive branch agency, and position title will be deleted manually when all related document data has been deleted. System administration reports will be deleted when OGE determines that they are no longer needed for administrative, legal, audit, or operational purposes under General Records Schedule 3.2, Item 30 .
Disposition of Permanent Records Will the records be exported to an approved format and transferred to the National Archives based on approved retention and disposition instructions? If so, what formats will be used? NRC Transfer Guidance (Information and Records Management Guideline - IRMG)	N/A

7 Paperwork Reduction Act

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain an Office of Management and Budget (OMB) approval in the form of a "control number"—before promulgating a paper form, website, surveys, questionnaires, or electronic submission from 10 or more members of the public. If the data collection is from federal employees regarding work-related duties, then a PRA clearance is not necessary.

7.1 Will the project be collecting any information from 10 or more persons who are not Federal employees?

Potentially, yes. Nominees to PAS positions are usually members of the public who will use the system to complete a Nominee OGE Form 278e.

7.2 Is there any collection of information addressed to all or a substantial majority of an industry (i.e., Fuel Fabrication Facilities or Fuel Cycle Facilities)?

No.

7.3 Is the collection of information required by a rule of general applicability?

Yes. 5 C.F.R. Part 2634.

Note: For information collection (OMB clearances) questions: contact the NRC's Clearance Officer. Additional guidance can be found on the NRC's internal Information Collections Web page at: <https://intranet.nrc.gov/ocio/33456>.

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8 Privacy Act Determination

Project/System Name: Integrity

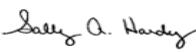
Submitting Office: Office of the General Counsel (OGC)

Privacy Officer Review

Review Results		Action Items
<input type="checkbox"/>	This project/system does not contain PII .	No further action is necessary for Privacy.
<input type="checkbox"/>	This project/system does contain PII ; the Privacy Act does NOT apply, since information is NOT retrieved by a personal identifier.	Must be protected with restricted access to those with a valid need-to-know.
<input checked="" type="checkbox"/>	This project/system does contain PII ; the Privacy Act does apply .	SORN is required - Information is retrieved by a personal identifier.

Comments:

Covered by Government-wide system of records, OGE/GOVT-1, Executive Branch Personnel Public Financial Disclosure Reports and Other Name – Retrieved Ethics Program Records.

Reviewer's Name	Title
 Signed by Hardy, Sally on 07/29/25	Privacy Officer

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9 OMB Clearance Determination

NRC Clearance Officer Review

Review Results	
<input type="checkbox"/>	No OMB clearance is needed.
<input type="checkbox"/>	OMB clearance is needed.
<input checked="" type="checkbox"/>	Currently has OMB Clearance. Clearance No. <u>3109-0001</u>

Comments:

The clearance number is for the OGE Form 278e.

Reviewer's Name	Title
 Signed by Benney, Kristen on 07/14/25	Agency Clearance Officer

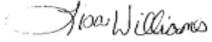
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10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input type="checkbox"/>	Additional information is needed to complete assessment.
<input type="checkbox"/>	Needs to be scheduled.
<input checked="" type="checkbox"/>	Existing records retention and disposition schedule covers the system - no modifications needed.

Comments:

Reviewer's Name	Title
 Signed by Dove, Marna on 07/28/25	Sr. Program Analyst, Electronic Records Manager
 Signed by Williams, Lisa on 07/24/25	Records and Information Management Specialist

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11 Review and Concurrence

Review Results	
<input type="checkbox"/>	This project/system does not collect, maintain, or disseminate information in identifiable form.
<input checked="" type="checkbox"/>	This project/system does collect, maintain, or disseminate information in identifiable form.

I concur with the Privacy Act, Information Collections, and Records Management reviews.



Signed by Nalabandian, Garo
on 07/29/25

Director
Chief Information Security Officer
Cyber Information Security Division
Office of the Chief Information Officer

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ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System:	
Integrity	
Date CISD received PIA for review:	Date CISD completed PIA review:
June 23, 2025	July 28, 2025
Action Items/Concerns:	