
U.S. Nuclear Regulatory Commission



**Privacy Impact Assessment
Business Application Support System (BASS)
Office of the General Counsel (OGC)
Ethics Gateway (Ethics)
Office of the Chief Information Officer (OCIO)**

**Version 1.0
10/05/2023**

Instruction Notes:

Please do not enter the PIA document into ADAMS. An ADAMS accession number will be assigned through the e-Concurrence system which will be handled by the Privacy Team

Template Version 2.0 (08/2023)

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

Document Revision History

Date	Version	PIA Name/Description	Author
10/05/2023	1.0	Office of the General Counsel (OGC) Ethics Gateway Initial Release	OCIO Oasis Systems, LLC
09/15/2023	DRAFT	Office of the General Counsel (OGC) Ethics Gateway DRAFT Release	OCIO Oasis Systems, LLC

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

Table of Contents

1	Description	1
2	Authorities and Other Requirements	2
3	Characterization of the Information	3
4	Data Security	5
5	Privacy Act Determination	7
6	Records and Information Management-Retention and Disposal	9
7	Paperwork Reduction Act	11
8	Privacy Act Determination	12
9	OMB Clearance Determination	13
10	Records Retention and Disposal Schedule Determination	14
11	Branch Chief Review and Concurrence	15

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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: Office of the General Counsel (OGC) Ethics Gateway (Ethics).

Data Storage Location (i.e., Database Server, SharePoint, Cloud, Other Government Agency, Power Platform) : Appian Cloud.

Date Submitted for review/approval: November 15, 2023.

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.

Ethics Gateway is a Platform-as-a-Service (PaaS) cloud-based system hosted by Appian Cloud which is a Federal Risk and Authorization Management Program (FedRAMP) authorized cloud service provider. The Ethics Gateway system provides two distinct services to the NRC.

Ethics Gateway functions as a gateway to support the submission of OGE Form 450, Confidential Financial Disclosure Report by specific NRC employees. OGE Form 450 data is maintained to meet the requirements of Executive Order 12674 as modified, 5 CFR part 2634, agency regulations thereunder, as well as section 107 of the Ethics Gateway in Government Act of 1978, as amended, concerning the filing of confidential financial disclosure reports. Such reports are required to assure compliance with ethics laws and regulations, and to determine if an actual or apparent conflict of interest exists between the employment of individuals by the Federal Government and their outside employment and financial interests.

The Ethics Gateway system also functions as a Communications and Advising module which provides advising and consulting services to NRC employees through a web portal. Employees submit questions and receive advice and guidance from the Ethics Consulting Team on a variety of ethical topics. This service is intended to improve the overall ethics awareness of the agency by providing a direct communication channel between employees and the Ethics Advising team.

The NRC has entered a contract with Appian Cloud for the provision of these services. Appian Cloud uses a PaaS model to provide Appian customers the use of their software through secure VPN Internet connectivity. The Appian Cloud services include the delivery of the software, the installation of updated versions, and the provisioning of technical support services. Appian’s Federal cloud customers operate within the FedRAMP compliant AWS GovCloud region.

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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

<input type="checkbox"/> PowerApps	<input type="checkbox"/> Public Website
<input type="checkbox"/> Dashboard	<input type="checkbox"/> Internal Website
<input type="checkbox"/> SharePoint	<input type="checkbox"/> None
<input checked="" type="checkbox"/> Other: Platform-as-a-Service (PaaS) cloud-based system hosted by Appian Cloud	

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> Applying the new PIA template.
<input type="checkbox"/>	Other (explain)

1.3 Points of Contact:

	Project Manager	System Owner /Data Owner /Steward	ISSO	Business Project Manager	Technical Project Manager	Executive Sponsor
Name	Jay Hosseini	Gwen Hayden	Consuella Debnam	N/A	Meghan Creedon	N/A
Office /Division /Branch	Investment and Project Support Management Office (IPSMO)	Office of the Chief Information Officer (OCIO)	Office of the Chief Information Officer (OCIO)		Office of the Chief Information Officer (OCIO)	
Telephone	301-415-0021	301-287-0761	301-287-0834		301-287-9158	

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
<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 CFR Part 2634 5 CFR Part 2635 5 CFR Part 2638 5 CFR Part 5801.102

Mark with an "X" on all that apply.	Authority	Citation/Reference
<input type="checkbox"/>	Memorandum of Understanding/Agreement	
<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).

Any individual who uses the system must provide minimal contact information, such as agency, business address, telephone number, and official email address. OGE Form 450 confidential filers use the system to provide their official position title and reportable personal financial information.

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

Social Security numbers are not collected.

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

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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 2023](#).

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"/>	Gender	<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	<input type="checkbox"/>	Accommodation/disabilities information
<input type="checkbox"/>	Marital Status	<input checked="" type="checkbox"/>	Other : Personal Financial Information, business address and telephone and official email address.
<input type="checkbox"/>	Children Information		
<input type="checkbox"/>	Mother's Maiden Name		

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).

OGE Form 450 see

[https://www.oge.gov/web/OGE.nsf/OGE%20Forms/072B8F6679028547852585B6005A2051/\\$FILE/OGE%20Form%20450%20Sep%202023.pdf?open](https://www.oge.gov/web/OGE.nsf/OGE%20Forms/072B8F6679028547852585B6005A2051/$FILE/OGE%20Form%20450%20Sep%202023.pdf?open)

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

OGE Form 450 see

[https://www.oge.gov/web/OGE.nsf/OGE%20Forms/072B8F6679028547852585B6005A2051/\\$FILE/OGE%20Form%20450%20Sep%202023.pdf?open](https://www.oge.gov/web/OGE.nsf/OGE%20Forms/072B8F6679028547852585B6005A2051/$FILE/OGE%20Form%20450%20Sep%202023.pdf?open)

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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

Individual users are the source of the information. OGE Form 450 confidential filers use the system to provide their official position title and reportable personal financial information. Please note that this information is covered under the OGE-Govt-1 SORN.

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

Filers fill out the OGE Form 450 with their own information and submit the form at which time the data is assumed to be correct unless issues are identified by the EG team review process.

3.5 Will PII data be used in a test environment? If so, explain the rationale.

No.

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

There are two options for correcting inaccurate or erroneous information.

1 - Reviewers and administrators can edit the form on the employee's behalf. This method automatically requires the employee to review and re-certify their information.

2 – Reviewers and administrators can return the form to the employee to make their own changes. They will then re-certify, and the form comes back to reviewers/administrators.

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).

Administrators and reviewers (limited to members of the ethics team in OGC), employees only have access to their own data.

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.

No information sharing.

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

N/A.

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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 type="checkbox"/>	Memorandum of Understanding Provide ADAMS ML number for MOU:
<input type="checkbox"/>	Other
<input checked="" type="checkbox"/>	None

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

Access to Ethics Gateway is based on the FPPS employee file which is uploaded daily. There are only two types of profiles being used in the Ethics Gateway system: Users and Admins. Ethics Gateway admins are manually designated by supervisory or other Admin staff based on OGC job function. All other user accounts are designated as non-elevated users. The user interface prevents non-privileged users from accessing privileged functions.

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).

Data transmission from the browser to the Ethics Gateway application is transferred using the HTTPS protocol (encrypted).

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

Data for the Ethics Gateway application is stored in Appian GovCloud (FedRAMP) on the local database for the NRC EG application.

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

The NRC Ethics Gateway is a web-based application and can be accessed by multiple users from different locations.

4.8 Can the project be accessed by a contractor? If so, do they possess an NRC badge?

Yes, System Administrators for the system are contractors who have an NRC badge.

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

The Appian system has extensive logging capabilities that can be used to track system activities.

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

When a user logs in, the system logs their IP and browser details; however, the system is not set up natively to track or observe individuals.

4.11 Define which FISMA boundary this project is part of.

BASS.

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 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.

20190118.

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, etc.)
<input checked="" type="checkbox"/>	List the identifiers that will be used to retrieve the information on the individual. < Name of applicant >
<input type="checkbox"/>	No, the PII is not retrieved by a personal identifier. If no, explain how the data is retrieved from the project.

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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"/>	<p>Yes, this system is covered by an existing SORN. (See existing SORNs: https://www.nrc.gov/reading-rm/foia/privacy-systems.html)</p> <p>Provide the SORN name, number, (List all SORNs that apply):</p> <p>OGE-Govt-1 SORN</p>
<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 on OGE Form 450
<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?

Mandatory.

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

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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)	Ethics Gateway
Records Retention Schedule Number(s)	The National Archives and Records Administration (NARA) Employee Ethics Records (General Records Schedule 2.8) is to be used to manage information in the OGC Ethics Gateway. Please see the schedule for individual Disposition Instructions for data being managed in the system.
Approved Disposition Instructions	GRS 2.8 – Employee Ethics Records Records are Temporary and disposed of according to the approved scheduled items. Retentions range from 1 to 6 years depending on the individual item number. However, longer retention is authorized if required for business use.
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.	N/A
Disposition of Temporary Records Will the records/data or a composite be automatically or manually deleted once they reach their approved retention?	N/A
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

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

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?

No.

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?

See 5 C.F.R. Part 2634 and 2638.205, 2638.104(c)

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>.

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

8 Privacy Act Determination

Project/System Name: Ethics Gateway (Ethics).

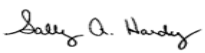
Submitting Office: Office of the General Counsel (OGC)

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:

Government-wide System of Records - OGE/GOVT-1 (Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records) and OGE/GOVT-2 (Executive Branch Confidential Financial Disclosure Reports)

Reviewer's Name	Title
 Signed by Hardy, Sally on 11/28/23	Privacy Officer


9 OMB Clearance Determination

NRC Clearance Officer Review

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

Comments:

No clearance is needed if information is only collected from current federal employees. The collection of this information from potential incoming employees whose positions are designated for confidential financial disclosure reporting prior to onboarding is covered by OMB No. 3209-0006


Reviewer's Name	Title
 Signed by Cullison, David on 11/21/23	Agency Clearance Officer

10 Records Retention and Disposal Schedule Determination

Records Information Management Review

Review Results	
<input type="checkbox"/>	No record schedule required.
<input checked="" 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 11/20/23	Sr. Program Analyst, Electronic Records Manager

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

11 Branch Chief 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 Feibus, Jonathan
on 11/28/23

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

Ethics Gateway	Version 1.0
Privacy Impact Assessment	10/05/2023

ADDITIONAL ACTION ITEMS/CONCERNS

Name of Project/System: Ethics Gateway (Ethics)	
Date CISD received PIA for review: November 15, 2023	Date CISD completed PIA review: November 21, 2023
Action Items/Concerns: 	
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>Caroline Carusone</i> <i>Director</i> <i>IT Services Development and Operations Division</i> <i>Office of the Chief Information Officer</i></p> <p><i>Garo Nalabandian</i> <i>Deputy Chief Information Security Officer (CISO)</i> <i>Office of the Chief Information Officer</i></p>	