

U.S. Consumer Product Safety Commission PRIVACY IMPACT ASSESSMENT				
Name of Project:	Employee Outside Activity Notices SORN CPSC-12			
Office/Directorate:	Office of General Counsel			
A. CONTACT INFORMATION				
Person completing PIA: (Name, title, organization and ext.)	Pamela Brinker, Attorney, OGC, X7840			
System Owner: (Name, title, organization and ext.)	Cheryl A. Falvey, General Counsel, OGC, X7642			
System Manager: (Name, title, organization and ext.)	Not Applicable – Not an Electronic System			
B. APPROVING OFFICIALS	Signature	Approve	Disapprove	Date
System Owner	Cheryl A. Falvey, OGC	CAF		4/13/10
Privacy Advocate	Linda Glatz, ITTP	✓		4-13-10
Chief Information Security Officer	Patrick Manley, ITTS	✓		5/12/10
Senior Agency Official for Privacy	Mary James, Director, ITTP	✓		5/11/10
System of Record? Yes No				
Reviewing Official:	Patrick D. Weddle, AED, EXIT	✓		5/11/10
C. SYSTEM APPLICATION/GENERAL INFORMATION				
1. Does this system contain any personal information about individuals? (If there is NO information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.)	Yes.			
2. Is this an electronic system?	No.			

D. DATA IN THE SYSTEM	
1. What categories of individuals are covered in the system? (public, employees, contractors)	Employees engaged in outside employment or outside activities such as consulting, teaching, or sales.
2. Generally describe what data/information will be collected in the system.	Employee's name and contact information, employee's position, nature of the outside activity, relation of official duties to outside activity, method of compensation for outside activity, and other information relevant to the outside employment or activity.
3. Is the source of the information from the individual or is it taken from another source? If not directly from individual, then what other source?	The information is taken directly from the individual.
4. How will data be checked for completeness?	Information directly from the individual will not be checked.
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	Employees are required to request prior approval for outside employment. Approval will be for a period not to exceed two years, after which, renewal approval must be sought. See 5 C.F.R. § 8101.103(a) and (d)
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	No.
E. ATTRIBUTES OF THE DATA	
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	The information is relevant and necessary so that ethics counselors can render accurate opinions regarding whether the outside activity creates a real or apparent conflict of interest with the employee's government duties and responsibilities.
2. For electronic systems, if the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.	Not applicable.
3. How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.	The data can be retrieved by the employee's name.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	None.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	The data is retained for six years after the approval date of the outside activity.
2. 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?	The information is destroyed by shredding six years after the approval date of the outside activity.
3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	Not applicable.
4. For electronic systems only, what	Not applicable.

controls will be used to prevent unauthorized monitoring?	
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	Yes, CPSC-12.
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	Not applicable. The system is not being modified.
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	Ethics Counselors in the Office of the General Counsel.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	Ethics counselors regularly undergo ethics and privacy training and must adhere to the principles of ethical conduct which specify the appropriate and inappropriate use of government property and information by federal employees.
3. Who is responsible for assuring proper use of the data?	Office of General Counsel
4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Are contractors involved in the collection of the data? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?	No.
5. Do other systems share data or have access to the data in the system? If yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?	No.
6. Will other agencies share data or have access to the data in this system? If yes, how will the data be used by the other agency?	No.
7. Will any of the personally identifiable information be accessed remotely or physically removed?	No.