

1. System Name: Employee Ethics Records.
2. System Location: Jackson Graham Bldg., 600 Fifth Street, NW, Washington, DC 20001 – Office of the General Counsel.
3. Categories of Individuals Covered by System: (1) Individual employees, or departmental officials on behalf of employees, who have sought guidance regarding any of the following: a conflict of interest, accepting gifts from Interested Parties, negotiation for post-WMATA employment, post-WMATA employment restrictions, financial transactions between employees, the acceptance of gifts from Interested Parties, and/or other similar concerns; and (2) WMATA employees who are required to submit an Interest Disclosure Statement Form or otherwise have made an ethics disclosure or report.
4. Categories of Records in the System: Records relating to inquiries regarding Code of Ethics, such as incoming and outgoing correspondence and information and notes based interviews and other correspondence of interested or knowledgeable persons. Records may include names, employee ID numbers, job codes, real estate holdings, and information related to non-WMATA employment and/or financial or other interests. Records may include code of ethics Gift Acceptance Reports, post-employment questionnaires, Interest Disclosure Statement Forms and code of ethics-related questionnaires.
5. Principle Purpose: To document decisions made regarding code of ethics inquiries and requests for waivers under the code of ethics; to ensure consistency in addressing similar future inquiries; to provide information in support of code of ethics related investigations; to document the receipt and disposition of gifts received by employees; to document when employees have conflicts of interest ; and to provide advice if conflicts are present.
6. Routine Uses of Records Maintained in the System: General Routine Uses A (Disclosure for Law Enforcement Purposes); B (Disclosure Incident to Requesting Information); D (Disclosure to Congressional Offices or Offices of Elected Officials in the Transit Zone); E (Disclosure to Courts or Administrative Bodies); F (Disclosure to Contractors, Grantors, Grantees, Federal Government Agencies, and Others); G (Disclosures for Administrative Claims, Complaints, and Appeals); H (Disclosure in Connection with Litigation); I (Disclosure to WMATA Unions); and J (Disclosure to the Government Accountability Office (GAO), Federal Transit Administration (FTA), or Other Government Oversight Agencies) apply to this system.
7. Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:

Retrieved by: Name of employee and employee ID number.

Storage: Electronic storage in a restricted access section of the COUN shared drive.

Safeguards: Restricted access to electronic location.

Retention and Disposal: Stored through employment and for five years from the date the employee is separated from employment.

8. Systems Manager/Administrator: Ethics Officer, Office of General Counsel, 600 Fifth Street, NW, Washington, DC 20001

9. Procedure for Notice, Access, and Contesting: Any individual who wants to know whether this system of records contains a record about him/her who wants access to his/her record, or who wants to contest the contents of a record, should make a written request to the Systems Manager listed above or **Privacy Administrator, Office of General Counsel, 600 Fifth Street, NW, Washington, DC 20001**. Requesters will be required to provide adequate identification, such as a WMATA ID, driver's license, or a government issued identification document. Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete Privacy Policy Procedures are set out in WMATA's Privacy Policy Instruction 9.2/2, which is posted on WMATA's website.

10. Records Source Categories: Individual employees, or departmental officials, who have sought guidance on WMATA's code of ethics. WMATA employees who have submitted an Interest Disclosure Statement Form, Gift Acceptance Report or other inquiry or report under the Code of Ethics. Ethics Officer and his or her delegees.