U.S. Department of Commerce
National Institute of Standards and Technology
(NIST)

Privacy Threshold Analysis
for the
172-01 Human Resources System

U.S. Department of Commerce Privacy Threshold Analysis

National Institute of Standards and Technology (NIST)

Unique Project Identifier: 172-01

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose: *Provide a general description (in a way that a non-technical person can understand) of the information system that addresses the following elements:*

The E-Government Act of 2002 defines "information system" by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: "Information system" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

a) *Whether it is a general support system, major application, or other type of system*
b) *System location*
c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
d) *The purpose that the system is designed to serve*
e) *The way the system operates to achieve the purpose*
f) *A general description of the type of information collected, maintained, use, or disseminated by the system*
g) *Identify individuals who have access to information on the system*
h) *How information in the system is retrieved by the user*
i) *How information is transmitted to and from the system*

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a. Whether it is a general support system, major application, or other type of system
The Human Resource System is a general support system.

b. System location
The GRB component is a commercially hosted application located in Virginia. The HRSTAT component stores data in Florida and Virginia facilities within the continental United States. The remaining components are located at the NIST Gaithersburg, Maryland, and Boulder, Colorado, facilities within the continental United States.

c. Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)

The Performance System component shares information with the USDA National Finance Center (NFC) (for payroll processing).

The NIST hosted Attachment Application (183-01, Applications System Division (ASD) – Moderate Applications) is a portal for storing HR documents that are attached to customer service requests for personnel actions. Customer service requests are initiated, stored, tracked, and managed from NIST 181-01 NIST Network Security System.

d. The purpose that the system is designed to serve
The Office of Human Resource Management (OHRM) is responsible for planning, developing, administering, and evaluating the human resources management programs of NIST and NTIS. This enables NIST to acquire and manage a dedicated, diverse, motivated, and highly qualified workforce to accomplish its mission and achieve its goals, while ensuring compliance with pertinent Federal, Office of Personnel Management, Office of Management and Budget, and Department of Labor, policy and administrative mandates.

e. The way the system operates to achieve the purpose

1. **Automated Reduction in Force (ARIF): Automates the reduction-in-force process for Human Resources staff from the selection of position(s) to be abolished, to the close of the case.**
2. **Performance System (Pay for Performance/General Workforce System): Provides the functionality for Human Resources staff, management, and administrative staff to record, document and report the annual employee performance rating, performance increase, bonus payout, and calculate the annual comparability increase. (ACI) for employees. Transmits updated data to the U.S. Department of Agriculture's (USDA) National Finance Center (NFC), which is the Department of Commerce's Payroll System of**
3. **Human Resource Arrival/Departure System (HRADS): Processes Entrance on Duty (EOD) and Departures, and automatically notifies other internal organizations of staffing changes.**
4. **Government Retirement Benefits (GRB): commercially hosted application that is used to perform employee retirement calculations based on salary and years of service. Upon an employee's request, authorized OHRM staff input the employee information into the system to perform the**
5. **HR STAT: Used to initiate and submit all Human Resources (HR) service requests to include completion and submission of HR forms, personnel action requests, and other HR requests.**
6. **USA Staffing: An application that is used to recruit, evaluate, assess, certify, select, and onboard employees. This is to include forms, workflow, approval, signature, tracking, and reporting. It will be implemented with the USA Staffing and USA Hire integrated talent acquisition systems.**

f. A general description of the type of information collected, maintained, use, or disseminated by the system

The system contains identifying numbers, general personal data, and work-related data for NIST and NTIS government employees in order to process Human Resource transactions beginning with the recruitment of an employee and continuing until their separation from the federal government.

g. Identify individuals who have access to information on the system

NIST Human Resource federal employees have access to information within the components based on their role.

h. How information in the system is retrieved by the user

Information in the components is not directly accessible by the user. Prior to employment, individuals may update their information directly with Human Resources. After the initial Human Resources hiring process, employees have opportunity to review/update their information using the National Finance Center (NFC) Employee Personal Page (EPP).

i. How information is transmitted to and from the system

The components of the system are only accessible on government issued computers through encrypted transmissions and are protected by multiple layers of firewalls. Each of the components permit assigning roles based on least privilege.

Questionnaire:

1. The status of this information system:
   This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2017 or later).
   (Skip questions and complete certification.)

Changes That Create New Privacy Risks (CTCNPR)
Other changes that create new privacy risks:

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

   NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

Activities
Other activities which may raise privacy concerns:

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

   As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

4. Personally Identifiable Information (PII)
4a. Does the IT system collect, maintain, or disseminate sensitive personally identifiable information (PII)?

   As per OMB 17-12: "The term PII refers to information that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual."

   The IT system collects, maintains, or disseminates PII about:

   If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

4d. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the approved PIA must be a part of the IT system's Assessment and Authorization Package.

Is a PIA Required?	**Yes**

CERTIFICATION

 X I certify the criteria implied by one or more of the questions above **apply** to the 172-01 Human Resources System and as a consequence of this applicability, I will perform and document a PIA for this IT system.

 I certify the criteria implied by the questions above **do not apply** to the 172-01 Human Resources System and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO):

Whiteside, Teresa

Signature of SO: TERESA GARCIA-WHITESIDE

Digitally signed by TERESA GARCIA-WHITESIDE
Date: 2021.09.22 14:21:00 -04'00'   Date: _____

Name of Co-Authorizing Official (Co-AO):

Brown, Essex

Signature of Co-AO: ESSEX BROWN

Digitally signed by ESSEX BROWN
Date: 2021.09.24 11:52:35 -04'00'   Date: _____

Name of Chief Information Security Officer (CISO):

Heiserman, Blair

Signature of CISO: _____

Digitally signed by BLAIR HEISERMAN
Date: 2021.09.24 14:35:11 -04'00'   Date: _____

Name of Authorizing Official (AO):

Sastry, Chandan

Signature of AO: CHANDAN SASTRY

Digitally signed by CHANDAN SASTRY
Date: 2021.09.22 12:51:47 -04'00'   Date: _____

Name of Privacy Act Officer (PAO):

Fletcher, Catherine

Signature of PAO: CATHERINE FLETCHER

Digitally signed by CATHERINE FLETCHER
Date: 2021.09.23 10:45:07 -04'00'   Date: _____

Name of Bureau Chief Privacy Officer (CPO):

Barrett, Claire

Signature of CPO: CLAIRE BARRETT

Digitally signed by CLAIRE BARRETT
Date: 2021.09.22 12:30:24 -04'00'   Date: _____