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U.S. Department of Commerce
Office of the Secretary

Privacy Threshold Analysis
for the
OHRM Applications

U.S. Department of Commerce Privacy Threshold Analysis

Office of the Secretary/
Office of Human Resources Management (OHRM) Apps

Unique Project Identifier: An EAS OS-059 Application

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 on 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 to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system: *Provide a brief description of the information system.*
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).

Performance Payout System (PPS) provides the functionality to record, Document and report the annual employee performance rating, performance increase, bonus payout and calculate the annual comparability increase (ACI) for the employees who are under the Commerce Alternative Personnel System (CAPS) pay plans and transmit updated data to the U.S. Department of Agriculture's National Finance Center (NFC) – the Department's Payroll System of Record.

Automated Classification System (ACS) contains key position data that supervisors use to create and simultaneously classify project position descriptions. In addition to creating new position descriptions, the ACS stores descriptions in a local user database and allows the user to create a new description based on one in the database; to revise, review, print, or delete descriptions; or to review and report on the descriptions in the database.

ERIS-Top Level (ERIS-TL) is designed to provide to a limited cadre of the most senior Commerce executives information regarding the incumbency status of all key positions to aid in executive level staffing decisions.

SES BP provides the functionality to record and report the annual performance ratings, performance increases, and bonus recommendations, and calculate the annual comparability increases (ACIs) for the SES employees and transmit the updated data to NFC.

Honor Award Nominee System (HANS) is an automated Gold and Silver Honor Awards Program nomination and reporting system. This system provides users' access to nominate employees and vote on nominations, and produce reports including certificate citations, program booklets, and seating charts.

CLC Datafeed is an outbound feed containing department-wide employee and non-employee personnel data used for account creation and maintenance for the Learning Management System.

Address the following elements:

a) *Whether it is a general support system, major application, or other type of system*
OHRM Apps are categorized as a child system of EAS OS-059

b) *System location*
The systems are primarily managed by resources located at the CBS Solutions Center in Gaithersburg, MD. The system is physically located at the Federal Aviation Administration Data Center (DOT/FAA/ESC) in Oklahoma City, OK.

c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
For payroll and payment processing, Human Resources (HR) personnel data files from OHRM's Pay for Performance System (PPS) and SES Bonus Pool System (SES BP), are batched to USDA's NFC database. A second file is uploaded to Department of Treasury's HR Connect System for future department wide all-in-one front-end HR system.
Data from CLC Datafeed is uploaded to the LMS vendor Cornerstone On-Demand, as a part of their user integration application.
The system also obtains data from USDA for PPS, CLC Datafeed, and the SES Bonus Pool.

d) *The purpose that the system is designed to serve*
The OHRM Applications supports the accomplishment of Department of Commerce and OHRM mission goals and objectives, which include ensuring that OHRM employees have computing ability needed to perform official duties, ensuring the availability of work products and information, and satisfying mission-oriented data processing requirements in a timely and cost-effective manner.
The OHRM include several applications that include:

- Automated Classification System (ACS) – Web-based system for creating new position description, editing, viewing, or deleting position description.
- Executive Resource Information System (ERIS) - SES End of Year – Web-based system for collecting SES ratings and bonus recommendations, and subsequent transmission to NFC.
- Executive Resource Information System (ERIS) - Top Level – Tracks Senior Executive Service employees and political appointees via the Monthly "Top Level" report.

- Honor Award Nominee System (HANS) – Web-based Honor Awards Program nominating and reporting system. Utilizes database to track honor award nominations and associated data, obtain management reports, and print information.
- Performance Payout System (PPS) – Utilized to perform the end-of-year performance and rating processes and to process the annual comparability increases covering Demo Project employees.
- CLC – SQL based Data Transformation Service (DTS) package.

e) *The way the system operates to achieve the purpose*

The OHRM applications utilizes a wide variety of HRIT systems to provide Department-wide human resources services. The applications perform vital Human Resource (HR) functions to support OHRM business.

- Automated Classification System (ACS) – ACS contains key position data that supervisors use to create and simultaneously classify project position descriptions. In addition to creating new position descriptions, the ACS stores descriptions in a local user database and allows the user to create a new description based on one in the database; to revise, review, print, or delete descriptions; or to review and report on the descriptions in the database.
- Performance Payout System (PPS) – PPS provides the functionality to record, document and report the annual employee performance rating, performance increase, bonus payout and calculate the annual comparability increase (ACI) for the employees who are under the Commerce Alternative Personnel System (CAPS) pay plans and transmit updated data to the U.S. Department of Agriculture's National Finance Center (NFC) – the Department's Payroll System of Record.
- ERIS- End of Year – Senior Executive Service (SES) Bonus Pool (BP) – SES BP provides the functionality to record and report the annual performance ratings, performance increases, and bonus recommendations, and calculate the annual comparability increases (ACIs) for the SES employees and transmit the updated data to NFC.
- Executive Resources Information System-Top Level (ERIS-TL) – provides information regarding the incumbency status of all key positions to aid in Executive Level (SES) Staffing decisions.
- Honor Award Nominee System (HANS) – HANS is an automated Gold and Silver Honor Awards Program nomination and reporting system. This system provides users' access to nominate employees and vote on nominations, and produce reports including certificate citations, program booklets, and seating charts.
- CLC Datafeed Database - CLC Datafeed is an outbound feed containing department-wide employee and non-employee personnel data used for account creation and maintenance for the Learning Management System (LMS).

f) *A general description of the type of information collected, maintained, used, or disseminated by the system*
OHRM utilizes a wide variety of HRIT systems to provide Department-wide human resources services. The group of these applications is commonly referred to as the OHRM Applications. The applications perform vital Human Resource (HR) functions to support OHRM business. As a result, several types of General Personal and Work-Related data are collected. SSN usage is minimized, but it is needed to ensure accurate employee reporting.

g) *Identify individuals who have access to information on the system*
Both government employees and contractors have access to the application and thus the PII/BII contained in it. HANS, SES BP, SES TL, PPS – CSC provides the support for these applications and is responsible for the account management. CSC will add user accounts after receiving written notification from the Bureau POCs with a business justification explaining why the access is required. In the case of PPS, a signed access request form from Bureau POC for all new end users. ACS and CSC provides the support for these applications, but account management is decentralized and managed by the bureau organizations.

h) *How information in the system is retrieved by the user*
Users can only print reports attributed to their assigned role within all the HR Systems. Their local printers or high-speed printers in their office vicinity. It is the responsibility of the users to handle printed media in accordance with established policies/procedures/rules of behavior and governmental record retention regulations of their bureau and DOC. Users can download information, again based on their assigned user role within the HR Systems , to removable media and it is their responsibility to handle digital media in accordance with established policies/procedures/rules of behavior and governmental record retention regulations of their bureau and DOC.

i) *How information is transmitted to and from the system*
Information is transmitted across approved encryption protocols such as HTTPS, SSH, and SFTP. Sensitive data transmissions are encrypted according to NIST 800-18, Federal Information Processing Standards (FIPS) 186-4, Digital Signature Standard and FIPS 180-4, and Secure Hash Standard issued by NIST when necessary.

Questionnaire:

1. Status of the Information System

1a. What is the status of this information system?

____ This is a new information system. *Continue to answer questions and complete certification.*

____ This is an existing information system with changes that create new privacy risks. *Complete chart below, continue to answer questions, and complete certification.*

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions		d. Significant Merging		g. New Interagency Uses	
b. Anonymous to Non-Anonymous		e. New Public Access		h. Internal Flow or Collection	
c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Character of Data	
j. Other changes that create new privacy risks (specify):					

____ This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*

_X__ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment. *Skip questions and complete certification.*

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

____ Yes. This is a new information system.

____ Yes. This is an existing information system for which an amended contract is needed.

____ No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.

____ No. This is not a new information system.

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.

____ Yes. *(Check all that apply.)*

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

____ No.

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.)."

____ Yes, the IT system collects, maintains, or disseminates BII.

____ No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate 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."

____ Yes, the IT system collects, maintains, or disseminates PII about: *(Check all that apply.)*

____ DOC employees
____ Contractors working on behalf of DOC
____ Other Federal Government personnel

____ Members of the public

____ No, this IT system does not collect any PII.

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?

____ Yes, the IT system collects, maintains, or disseminates 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.

____ No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

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

____ Yes, the IT system collects, maintains, or disseminates PII other than user ID.

____ No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

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.

____ Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

____ No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

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 SAOP approved PIA must be a part of the IT system's Assessment and Authorization Package.

CERTIFICATION

__X__ The criteria implied by one or more of the questions above **apply** to the OHRM Applications and because of this applicability, a PIA will be performed and documented for this IT system.

_____ The criteria implied by the questions above **do not apply** to the OHRM Applications and because of this non-applicability, a PIA for this IT system is not necessary.

Information Technology Security Officer Name: Eduardo Macalanda Office: DOC OFMS Phone: 301-355-5987 Email: emacalanda@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: EDUARDO MACALANDA Digitally signed by EDUARDO MACALANDA Date: 2022.07.25 16:17:32 -04'00' Date signed:	**Chief Information Security Officer** Name: Densmore Bartley Office: OS OCIO Phone: 202-482-3186 Email: dbartley@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: DENSMORE BARTLY Digitally signed by DENSMORE BARTLY Date: 2022.08.03 10:25:34 -04'00' Date signed:
System Owner Name: Teresa Coppolino Office: DOC OFMS Phone: 301-355-5501 Email: tcoppolino@doc.gov I certify that the appropriate authorities and SORNs (if applicable) are cited in this PIA. Signature: TERESA COPPOLINO Digitally signed by TERESA COPPOLINO Date: 2022.07.26 08:35:55 -04'00' Date signed:	**Authorizing Official** Name: Dr. Lawrence W. Anderson Office: OS OCIO Phone: 202-482-2626 Email: landerson@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: LAWRENCE ANDERSON Digitally signed by LAWRENCE ANDERSON Date: 2022.08.03 14:39:14 -04'00' Date signed:
Authorizing Official Name: Stephen M. Kunze Office: Office of Financial Management Phone: 202-482-3709 Email: skunze@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: STEPHEN KUNZE Digitally signed by STEPHEN KUNZE Date: 2022.07.27 11:49:59 -04'00' Date signed:	**Privacy Act Officer** Name: Tahira Murphy Office: Office of Privacy and Open Government Phone: 202-482-8075 Email: tmurphy2@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: Tahira Murphy Digitally signed by Tahira Murphy Date: 2022.09.12 17:00:19 -04'00' Date signed:

Section intentionally left blank.	**Bureau Chief Privacy Officer** Name: Tahira Murphy Office: Office of Privacy and Open Government Phone: 202-482-8075 Email: tmurphy2@doc.gov I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system. Signature: Tahira Murphy Digitally signed by Tahira Murphy Date signed: Date: 2022.09.12 17:01:42 -04'00'