# U.S. Department of Commerce

## Privacy Impact Assessment
## for the
## Human Resources Management System (HR Connect)

Reviewed by: ______________________, Bureau Privacy Officer or Designee

Approved by: ______________________, DOC Chief Privacy Officer

Date approved: 3|5|2014

# *HR Connect, Privacy Impact Assessment (PIA)*

**February 13, 2014**

## Identification

| | |
|---|---|
| System Name: | HR Connect |
| OMB Unique Identifier: | 015-00-01-013-01-1226-24 |
| Business Owner: | Treasury, Office of the Deputy Assistant Secretary for Human Resources/Chief Human Capital Officer (DASHR/CHCO) |

Project Title: Human Resources Management System (HRMS) Project
*HR Line of Business (HRLOB) for Department of Commerce*
*HR Connect*

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# Privacy Impact Assessment

## A. System/Application General Information

1. Description of the Project:

   *In 2010 DOC made a decision to implement a Human Resources Management System (HRMS) that complies with the Human Resources Line of Business Requirements (HRLOB) model developed by the Office of Personnel Management (OPM). DOCs vision for the HRMS is to provide an Agency-wide, modern, cost-effective, standardized, and interoperable HR solution that delivers common, core functionality to support the strategic management of human capital and addresses the manual and inefficient processing of HR transactions. The HRMS will provide an automated web-based system that will support the core personnel processes provided by DOC's HR professionals while enabling DOC managers and employees to easily manage personnel information and make strategic human capital decisions.*

   *OPM has published detailed guidance on the Shared Service Center (SSC) selection and mitigation process. Leveraging that guidance, DOC has evaluated the six (6) OPM certified public sector SSCs and has identified Treasury's HR Connect as its preferred provider.*

2. Who is involved in the HRMS Project at Department of Commerce?

   *DOC's core HRMS project team is comprised of program and project management support as part of the Office of Human Resources Management (OHRM). The Director and Deputy Director of OHRM are serving as the project's executive sponsors. Each of DOC's Human Resources Service Organizations (HRSOs) has assigned a designated project lead and various subject matter experts to participate in the project. These HRSOs include operating units from CENSUS, DOCHROC, ITA\CS\FS, NIST, NOAA, OIG, and USPTO.*

   *Program oversight and governance is provided by OPM, Capital Planning and Investment Control (CPIC), Commerce Business Systems (CBS) Executive Board, Principal Human Resource Managers (PHRM) council and bureau level Executive Review Boards (ERB). At times other oversight groups have been engaged including the Commerce Information Technology Review Board (CITRB) and the Chief Finance Officer Council (CFO).*

3. What is the purpose of the system/application?

   *HR Connect is Treasury's enterprise system, a web-based solution built on PeopleSoft commercial-off-the-shelf (COTS) software. HR Connect transforms core back-office HR functions, moving them from a processing-centric capability supported by Treasury bureaus legacy systems, to a strategic-centric capability enabled through its commercial software underpinning. Additionally, self service components of the software fundamentally transform the standard government HR service delivery model, putting additional information, services, and processes (i.e. personal data, position management, requests for personnel action, recruitment, reporting, etc) directly in the hands of managers and employees.*

   *From a business perspective, the Department of Commerce's decision to migrate its HRSOs to an HR Line of Business (and specifically HR Connect) mandated that all DOC bureaus co-exist in one standard software code line, ending a DOC history of bureau HR system autonomy through varied implementations of other legacy HR systems and traditional paper-based processing. Through HR Connect's implementation, HR and information technology standardization is being realized.*

   *HR Connect supports the common HRLOB processes and provides core HR functionality that is interoperable, portable, and scalable. HR Connect's core functions include: Administering Benefits, Employee / Labor Relations case tracking, Managing Payroll, Organization and Position Management, Personnel Action Processing Separation Management and Staff Acquisition. Through partnership, HR Connect delivers components of long term HRLOB functionality today.*

## B. Data in the System

1. Does the system contain any information in identifiable form (IIF) and personal identifiable information (PII)?

   *Yes. – Treasury's HR Connect system is categorized as FIPS 199 High.*

2. What categories of individuals are covered in the system?

   *Employees, former employees, and applicants for employment. In addition, the system has the capability to house information on government contractors, consultants, and other persons of interest.*

3. What are the sources of information for this system?

   *The major source of information is provided by the individual employee and is maintained in HR Connect by managers, and SHRO personnel. The resulting data is stored at Treasury and processed nightly to the National Finance Center (NFC), the Department of Commerce's payroll System of Record. These systems of record are comprised of a database and files that SHROs maintain on employees for completing personnel actions. This information includes employee identification and status data such as name, records that establish an individual's identity, social security number, date of birth, gender, race, national origin, awards received, work veterans preference, and military service history, to name a few.*

4. What Federal Agencies are providing data for the system?

   *The Department of Commerce and its various SHROs are responsible for providing the employee data in the system. Supporting data is provided by the Office of Personnel Management (OPM) and the National Finance Center (NFC).*

5. What State and/or Local Agencies are providing data for use in the system?

   *None.*

6. What information will be collected from the employees, government contractors, consultants, and the public?

   *Personnel information relating to government contractors and consultants comes directly from a source designated as the contracting office or the contracting officer technical representative, and includes employee identification, and status data such as name, records that establish an individual's identity, social security number, date of birth, sex, race and national origin.*

   *The bulk of employee information (as mentioned above) is provided by The National Finance Center (NFC), the Department of Commerce's payroll System of Record. This includes information regarding national ID (SSN), job data, compensation data, location information, etc. Additional information can be provided directly by the employee as desired (provided directly from the individual employee or from a source designated in writing by that employee) including emergency contact information, additional address and location information, name change information, etc).*

7. How will data collected from sources other than Treasury records be verified for accuracy?

*Any data that is collected from sources other than HR Connect records concerning an employee is subjected to the data protections afforded by the Privacy Act of 1974, as amended [5 USC 552a]. Data is entered by agency HR Specialist and verified for accuracy and relevancy and then verified through SF50 functionality. Data that is contained in HR Connect is reflective of employee data in NFC; consequently it will be the employee and the HR Servicing Office at the OU Level (SHRO) that will consistently verify that the data is accurate and relevant. Employees have direct access to their data so they will share the responsibility of maintaining its accuracy.*

8. Is the data current?

*Data templates are filled out and submitted by dedicated HR data Subject Matter Experts (SMEs) at each of the various operating units where Treasury then merges the information with current data from NFC to populate HR Connect. Treasury's project team reads the data, as they are responsible for the maintenance of the system, help desk practices, and troubleshooting to solve problems that may arise. (Templates are completed during the migration process to HR Connect)*

9. What steps or procedures are taken to ensure that the data is current and not out-of-date?

*The HR Servicing Operation Centers, through HR SMEs will maintain an employee's HR record in addition to allowing the individual (through Employee Self Service—ESS) to update their data throughout their employment to keep it current. The currency of the data obtained from a bureau's HR office is subject to their data management business rules.*

10. Are the data elements described in detail and well documented?

*Yes, all data elements pertaining to human resource information have been detailed and documented pursuant to the requirements imposed by OMB Circular A-130. The data elements are documented in NFC. In addition, data templates are completed prior to conversion, which are used to determine what data goes into HR Connect. These templates (both completed and blank) are maintained by the Department and Treasury.*

11. Are individuals notified if their PII/BII is collected, maintained, or disseminated by the system?

*Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section D.*

*Individuals are initially notified that they have PII/BII within the system (HR Connect) and that they have access to that system and their individual data (Employee and Manager Self Service).*

*Once an action goes to NFC and applies, an employee will get an email notification when their information is altered in eOPF and that their SF50 has been altered. This is the same process that Commerce currently operates with when it comes to employee PII/BII in NFC.*

*Note: The bureau has the option of turning off email notifications in eOPF so the employee will not receive notification. This decision is maintained outside of the HRMS project and the HR Connect and is independent on an individual, bureau basis.*

12. Do individuals have an opportunity to decline to provide PII/BII?

*No. Individuals do not have the opportunity to initially decline to provide PII/BII. HR Connect is a front end interface to NFC and is automatically populated with the NFC data of every individual in the organization. HR Connect is then utilized as an automated, core HR processing tool for the entire Department of Commerce.*

*Employees have the option (pursuant to bureau level business processes) to either use or not use HR Connect for employee self service/manager self service. However, they do not have the option to initially provide/decline their PII Data.*

*The authorities referenced in the Commerce Department SORNs are: Title 5 U.S.C., Title 31 U.S.C. 66a, 492, Title 44 U.S.C. 3101, 3309, E.O. 12107, and E.O. 13164.*

13. Do individuals have an opportunity to consent to particular uses of their PII/BII? If yes, then how?

*In HR Connect, employees have the option of accessing their own PII/BII (to review and update). However, they do not have the opportunity to consent to particular uses of their information.*

*The authorities referenced in the Commerce Department SORNs are: Title 5 U.S.C., Title 31 U.S.C. 66a, 492, Title 44 U.S.C. 3101, 3309, E.O. 12107, and E.O. 13164.*

## C. Attributes of the Data

1. Is the use of the data both relevant and necessary to the purpose for which the system is designed?

   *Yes.*

2. Will the system derive new data?

   *No.*

3. Will the system create previously unavailable data about an individual through aggregation from the information collected? If so, how is it maintained?

   *Yes. HR Connect is a replacement system for the current human resources systems and paper processing at Department of Commerce. The system will create one piece of previously unavailable data: an employee identifier data (employee ID).*

4. Will the new data be placed in the individual's record?

   *Yes. The employee ID number will reside within HR Connect and will be used to identify the employee and contractor/consultant to the system as long as the individual HR record remains with the Treasury Department or one of its bureau's or customer agencies.*

5. How will the new data be verified for relevance and accuracy?

   *If any data originates with the individual supplying the information except for the system generated employee identifier, verification for relevancy and accuracy inures to the individual as it pertains to their own individual Personally Identifiable Information (PII).*

6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access and use?

   *Any data consolidation that occurs is protected under statutory controls, such as the Privacy Act, configuration management controls, security controls, profiles and access controls in conjunction with the "need-to-know" principles for data protection.*

7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?

   *Yes. Under the configuration management and data controls that are currently in place for HR Connect, only authorized individuals may access their own personally identifiable information under the "need to know" authorities. The proper controls remain in place to protect the data and prevent unauthorized access. HR Connect complies with Treasury IT security policy for certification and accreditation, risk assessments and continuous monitoring of security controls.*

8. How will the data be retrieved? Does the personal identifier retrieve the date? If yes, explain and list the identifiers that can be used to retrieve information on the individual.

   *Yes, data is retrievable by personal identifier. Data can be retrieved either by the employee identifier as it pertains to an individual, or by the name of the employee if the information is being retrieved by either the manager of record or in the case on contractors/consultants, by the manager of the contract.*

9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

   *HR Connect has numerous reports built into its system and data is also defined in Workforce Analytics (WA). WA is an ad hoc reporting tool which includes information on the employee, job, position, and performance related information. (Access to various reports is based on system security roles and "need to know" criteria). Employee related data is available to managers for effective workforce administration: for example the processing of personnel actions, roster, employee location, not to exceed (NTE) dates, emergency contacts, pending and processing actions, and financial disclosure. Included in HR Reports are inbound interface reports, NFC error listings (SINQ), manager initiated actions, group/mass awards, NTE dates, emergency contacts, etc.*

## D. Maintenance and Administrative Controls

1. If the system is operated in more than one site, how will the consistent use of the system and data be maintained in all sites?

   *The Treasury Department HR Connect is operated at a single location, the Federal Data Center, which is currently at the Memphis Computing Center.*

2. What are the retention periods of the data in the system?

*The retention periods of data contained in this system are covered by General Records Schedules #1. Civilian Personnel Records and have various retention periods for specific types of data.*

3. 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?

   *Reports in the system are retained for 7 to 14 days based on data management business rules.*

   *The procedures for eliminating the data at the end of the retention period adhere to the Federal Records Act of 1950 and National Archives and Records Administration Guidelines in addition to the Treasury Information Systems Life Cycle (ISLC) management requirements.*

4. Is the system using technologies in ways that have not previously employed (e.g. monitoring software, smart cards, caller – ID)?

   *HR Connect is an integrated Treasury Department owned and operated human resource enterprise solution that is using a proven COTS product supported by technology that has a well established reputation.*

5. How does the use of this technology affect public/employee privacy?

   *The technology will enhance an individual's control over their own Personally Identifiable Information (PII) through role based access.*

6. Will this system provide the capability to identify, locate, and monitor individuals?

   *HR Connect does provide the capability to identify and employee via the employee identifier to gain access to the system through the network gateway. It also provides the capability to locate and authenticate an individual to ensure that only authorized individuals are utilizing the system. The monitoring capabilities are a security requirement in order to ascertain whether or not an individual is attempting to thwart the security mechanisms or manipulate data that is not owned by the individual nor access permissions under "need-to-know" principles.*

7. What kinds of information are collected as a function of the monitoring of individuals?

   *Currently, HR Connect is collecting the ID, time, date, successful logins and failed login attempts for both privileged and non-privileged users.*

8. What controls will be used to prevent unauthorized monitoring?

   *HR Connect has security checks that are built into the system to ensure that privacy safeguards are not abused or bypassed. For instance, access profiles are used to enable an individual to access their own information but will permit security administrators to monitor any individual that engages in any unauthorized or malicious behavior within the HR Connect environment. In addition, before users complete registration they must accept the system Rules of Behavior. Audit trails are reviewed on an ad-hoc basis and monitoring tools such as intrusion detection devices and vulnerability scanning tools have also been deployed.*

9. Under which Privacy Act SORN does the system operate?

   *This system is covered by the following existing system of records notices at the U.S. Department of Commerce:*

   *Commerce/Dept-1, Attendance, Leave, and Payroll Records of Employees and Certain Other Persons*

   *Commerce/Dept-18, Employee Personnel Files Not Covered by Notices of Other Agencies*

   *The system of records notice used by the U.S. Department of Treasury is: Treasury .001 – Treasury Personnel and Payroll System.*

10. If the system is being modified, will the Privacy Act SORN require amendment or revision?

   *No.*

## E. Access to Data

1. Who will have access to the data in the system?

   *Department of the Treasury and Customer Agency Employees and Managers. HR Connect System Administrators, Developers, and system maintenance personnel at the Federal Data Center located at the Memphis Computing Center. All access is based on "need-to-know" and the corresponding system access profiles.*

2. How is access to the data by a user determined?

*Access to the data by a user is determined based upon the user profile that is identified under the strict "need to know" criteria and also as a function of position. The criteria, procedures, controls, and responsibilities regarding access are documented in the security features user guides.*

3. Will users have access to all the data on the system or will the user's access be restricted?

   *Users will only have access to the data that is inherently theirs to access such as their own Personally Identifiable Information (PII). In the case of managers, these managers will only have access to the information that is specifically under their direct ownership or strict "need to know" access controls (i.e. employees that report to them) as well as their own personally identifiable information.*

4. What controls are in place to prevent the misuse (e.g. unauthorized browsing) of data by those having access?

   *Entrances to data centers and support organization offices are restricted to those employees who require access. Disclosure of information through remote terminals is restricted through the use of passwords and sign-on protocols, which are periodically changed. (A password change is required every 90 days). In addition privileged users are required to annually sign the rules behavior. (An electronic copy of the rules of behavior is available on the HR Connect system and attached to this correspondence).*

   *The HR Connect application prevents the misuse of the data through a profiled access approach. That is, only individuals with an established "need to know" may access only their specific profiled data that is controlled by the system security mechanisms that are outlined in NIST 800-53 and the HR Connect system security plan.*

5. Are contractors involved with the design and development of the system and will/are contractors involved with the maintenance of the system?

   *Yes. When a contract provides for the operation of a SOR on behalf of the Department, the Privacy Act requirements and Departmental regulations on the Privacy Act must be applied to such a system. The Federal Acquisition Regulations (FAR) also require that certain information be included in contract language and certain processes must be in place (see FAR 48 CFR.24.102(a)) and Treasury Acquisition Regulation 48 CFR.*

6. Do other systems share data or have access to the data in the system? If so, explain.

*Yes, shared with the data owners but not unauthorized third party organizations and companies. As HR Connect is presently configured, other systems are not sharing data contained in HR Connect. HR Connect is the data store for human resource information under Treasury member bureau and HRLOB customer auspices. As such, any system wishing to have extracts from HR Connect must follow configuration management principles and procedures in conjunction with the HR Connect Program Office and member bureau's and agencies prescribed information systems protocols to have access to HR Connect via specific written agreement. The data is inserted into other systems and then sent to HR Connect.*

7. Who will be/is responsible for protecting the privacy rights of the public and employees affected by the interface?

   *All users of the HR Connect system are responsible for protecting privacy rights of employees. This is communicated through security and privacy awareness training on an annual basis. For the interfaces described above, the HR Connect System Owner and Information Owner of the data involved in the interface is responsible for protecting the privacy rights of the employees affected by the interface.*

   *As previously stated, the interface as used in this context is not occurring at the present time. However, should any such interface surface occur to support future releases or functionalities within HR Connect, the responsible party or parties for protecting the privacy rights of employees will reside with each individual who has access to their own personally identifiable information and ultimately the Treasury secretary as well as his/her agency counterparts as the owner and users of the HR Connect enterprise system. In the case of HR Connect, the support staff who may have access to information that is generated from any potential future interface would also be responsible for protecting the privacy rights of individuals.*

8. Will other agencies share data or have access to the data in this system (e.g. Federal, State, Local, other)?

   *Other non-customer agencies may provide data on specific individuals at their request to the Treasury Department's HR Connect. As such, those agencies may share data but will not have access to the data in the HR Connect System.*

9. How will the data be used by the other agency(s)?

   *Data is only shared under statutory authorities/dictates mandated under the Privacy Act and Treasury Department Policies. The agency that received information must adhere to the statutory dictates under which the information* *was supplied to them. The agency is provided access through role based access control.*

10. Who is responsible for assuring proper use of the data?

*The data providers are responsible for assuring proper use of the data through various agreements and statutory mandates (e.g. The Privacy Act).*