



Privacy Impact Assessment  
for the

## HR Solutions

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## Abstract

The Department of Homeland Security, Office of the Chief Human Capital Officer (OCHCO) operates the HR Solutions System. HR Solutions is a newly developed system designed to aid in the administration of the Human Capital Processing of human resources operations and services. OCHCO conducted this PIA because HR Solutions collects and maintains personally identifiable information (PII).

## Overview

The OCHCO is responsible for administering human resources services for DHS Headquarters and components.<sup>1</sup> As part of this administration, OCHCO employees are regularly required to access other OCHCO systems and perform tasks associated with a particular employee or prospective employee. These tasks require two essential elements: easy access to centralized personnel records and a structured tasking function (Action Tracker). HR Solutions provides both of these elements.

HR Solutions is network and Shared Space operated by contractor support on behalf of OCHCO. This PIA will discuss the basic system design of HR Solutions and the major elements of HR Solutions (access to files via a Shared Space and Action Tracker), as well as any privacy risks associated with the system.

Prior to the development of HR Solutions, contract human resources personnel were located at different locations, delaying communication and document transfer. The HR Solutions network will allow all contract support personnel to be centrally located. The advantage of having the staff and computing network centrally located is that efficiency can be gained more by utilizing common processes and procedures with the added advantage of being able to immediately shift resources more effectively as necessary. HR Solutions will serve as the central repository to help manage receipt and management of human resources needs.

Structurally, the HR Solutions system is thirty-two (32) networked desktop computers with an accompanying Shared Space for document management. Employees and contractors of DHS OCHCO are the only individuals who can access the Shared Space.

OCHCO management will use the Action Tracker to assign a user with a specific human resources task. Each task will have attached any relevant human resources forms and documents necessary. The user will save the relevant documents to the Shared Space. The user will complete the task in the relevant HR system (for example, eRecruitment) and then notify the Action Tracker that the task is complete.

The HR Solutions network (specifically the Shared Space) is linked only to DHS OCHCO. Action Tracker, the tasking agent within HR Solutions, will assign a user within the HR Solutions network with a certain human resources task. Any relevant human resources forms and documents necessary to complete the tasking will be attached to the Action Tracker message. The user will save the required documents to the shared space. The user will then access, for example, an external site like eRecruitment to fulfill the task. Once the task is complete the user will update the action in Action Tracker.

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<sup>1</sup> Most components continue to utilize their existing human resources systems, but various OCHCO initiatives are moving some component systems into DHS enterprise solutions.



The HR Solutions system will be used to track perform various human resources actions such as time and attendance (WebTA), recruitment actions using the eRecruitment system along with Office of Personnel Management (OPM) USAJobs and DHS e-Qip, and position/personnel management using National Finance Center (NFC) Corporate, EmpowHR and electronic Official Personnel File (EOPF)<sup>2</sup>. Specific to eRecruitment, the HR Solutions network and shared space enables support staff to post a vacant job, receive resumes, process certifications, and select a candidate.<sup>3</sup>

## Security

The design and implementation of the HR Solutions security architecture is a combination of software and hardware primarily used for sensitive but unclassified office automation. The initial Certification and Accreditation for HR Solutions is scheduled for July 31, 2008. Access to HR Solutions is granted to the government and contractor personnel, located at 1201 New York Ave NW, Washington D.C. via secure inbound VPN. All personnel and system users have an active DHS background suitability check on file with the DHS security office.

## Information Sharing and Interconnections

HR Solutions is a partially closed network of computers at a contractor support facility. As noted above, HR Solutions prompts individuals to interface with several internal and external human resources systems, but HR Solutions does not have a direct feed of data from any other system. DHS OCHCO users must either push data to HR Solutions (through a tasking, for example) or pull data from HR Solutions (from the Shared Space) (see Question 1.5 for detail on the dynamics of the push-pull). The HR Solutions System provides access to various other systems including USDA NFC Corporate, DHS eRecruitment/OPM USAJobs/DHS e-QIP (all are interconnected as part of the intake process), USDA EmpowHR WebTA, and OPM eOPF) by authorized DHS users.

## Typical Transaction

A member of the HR Solutions system is tasked with collecting the resumes of the individuals who have applied for a particular DHS job. The task itself will arrive through Action Tracker. The HR Solutions user will acknowledge receipt of the task. The user will then use his or her access to eRecruitment to collect the resumes for the particular position. That transaction occurs exclusively on eRecruitment. Once the resumes are downloaded from eRecruitment, the HR Solutions user saves them on the Shared Space, and coordinates delivery via email or courier service to the individual who requested the resumes via Action Tracker. The user then closes the task within Action Tracker as completed.

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<sup>2</sup> USAJobs is the official OPM website for Federal job listings. E-Qip is a web-based application which automated the Federal employee hiring and clearance processes. WebTA manages time and attendance records (DHS has published a PIA on its WebTA). The NFC processes payroll for the Federal government and is operated by the Department of Agriculture. EmpowHR is a workforce management tool operated by the Department of Agriculture. The eOPF is the electronic version of an employee's personnel file. DHS has also published a PIA on its eRecruitment system.

<sup>3</sup> See the eRecruitment PIA for more detail ([www.dhs.gov/privacy](http://www.dhs.gov/privacy), follow the links to Privacy Impact Assessments”).



## Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

### 1.1 What information is collected, used, disseminated, or maintained in the system?

Action Tracker collects the following data elements: last name, first name, organization, telephone number, fax number, and email address for DHS employees or contractors who are working a requested action.

The HR Solutions Shared Space will contain SF-52s (Request for Personnel Action), Senior Executive Service (SES) actions, awards (leave and money), and payroll and benefit documents (e.g., Federal/State tax forms, direct deposit forms, Federal Employee Health Benefits, Thrift Savings Plan, Voluntary Leave Transfer Program, etc.), garnishments, and student loan repayment (if repayment is completed through the Federal government). It also includes submitted voluntary self identification of Race and National Origin Identification (SF-181) data and other applicant flow requirements of Management Directive MD-715.

1. SF-52 (Request for Personnel Action) or PAIs that contain identifying information regarding the individual for which a personnel action is requested/taken; organizational information such as budget and organizational codes; and information regarding salary and the legal authority to take the personnel action.
2. Vacancy Announcements which are developed to post job vacancies in USA JOBS, e-Recruitment and other recruiting sources. These announcements are posted to attract applicants for positions to be filled in DHS Headquarters and are stored electronically and in a hard copy staffing case file.
3. Resumes – These are the applicants who apply for jobs posted via USA JOBS and e-Recruitment. These resumes are stored electronically. The resumes of the applicants who are referred for possible selection along with the selectee, are stored in hard copy in the staffing case files as well.
4. DD-214 – These veterans' status forms are maintained electronically and in hard copy (selectee) as part of the official staffing case file.
5. Selection Certificates – These are the official Certificate from which managers may make selections from jobs. This is stored electronically and in hard copy in the staffing case file.
6. Tentative Job Offer letters – These are the tentative job offers that are sent to selectees pending their suitability and/or security clearances. Hard copies of these are stored in the staffing case file.
7. Final Job Officer letters – These are the final notices to selectees informing them that they are officially cleared to on-board. These letters are stored in the staffing case file.



8. Monthly Status Reports – These reports are maintained electronically. They are the reports submitted to OCHCO to track status of work for the previous month.
9. Ad-Hoc Reports – As ad-hoc requests are completed and submitted to OCHCO and other requesting authorities (e.g. General Accounting Office), soft and hard copies are maintained in appropriate files.
10. OPM 45-Day Hiring Report – This report is prepared for the Office of Personnel Management and contains performance data on how the Agency is meeting Office of Personnel Management’s goal of completed hiring actions (up to selections), within 45 days. These reports are maintained in both electronic and hard copy files.

It is important to note that the HR Solutions Shared Space will contain certain documents of an employee’s personnel file. An employee’s entire file may be present on the shared space, but documents are saved on the shared space only if delivered as part of a tasking. In most instances, only certain documents related to certain tasks will appear on the HR Solutions Shared space, therefore, under most circumstances, an employee’s complete file will never be present on the Shared Space.

## **1.2 What are the sources of the information in the system?**

Action Tracker receives its information from OCHCO as employees are tasked with personnel actions.

The sources of information for the HR Solutions files will include information in on any DHS form used for human resources purposes.

It is important to note that the SF-52 is generated by OCHCO while the other forms are produced elsewhere and provided by the applicant/employee to OCHCO.

## **1.3 Why is the information being collected, used, disseminated, or maintained?**

The HR Solutions system serves as a repository to store PII such as job applications, personnel, and payroll data for the purpose of performing HR operations.

The Action Tracker is used to manage and track case/workload management and to generate performance metrics based on the workload.

## **1.4 How is the information collected?**

Information is collected directly from employees or potential employees on forms and through electronic and paper means.

## **1.5 How will the information be checked for accuracy?**

HR Solutions is set up to serve as a data repository that provides system access to personnel information. Checks by HR staff for accuracy, completeness, and validity of information is accomplished before



information is saved. Because HR Solutions operates a push-pull interface with DHS OCHCO, in order to preserve document integrity and accuracy, should DHS OCHCO “pull” a document from the HR Solutions shared space, that document is physically removed from the HR Solutions Shared Space. The OCHCO user who “pulled” the document is free to use and edit the document as necessary and “push” it back to HR Solutions. Once the document is back on HR Solutions Shared Space, the OCHCO cannot edit the document. This ensures that changes made by HR Solutions are not being duplicated or altered at the same time as another OCHCO user working on the same document.

The Action Tracker has data validation routines built into the interface that checks for required fields, data types, and data ranges. Additionally, the business logic layer processes data before it is committed to the database, checking the data against business logic for accuracy and consistency.

Further, the HR Solutions network will be used to access NFC Corporate in order to resolve Suspense Inquiry and Correction (SINQ) errors, and process History Correction and Update (HCUP) and Special Payroll Processing System (SPPS) actions. SINQ is used to query and correct payroll/personnel documents that fail certain edits. HCUP is used to update personnel history data and to enter late, replacement, and newly required personnel actions. SPPS is used to process quick service payments, final salary payments for indebted employees, and payments to the estate of a deceased.

## **1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

The Homeland Security Act of 2002 called for the establishment of a new human resources system for the DHS that is flexible and contemporary. In related legislation, the E-Government Act of 2002 called for the use by the Government of web-based Internet applications and other information technologies, combined with processes that implement these technologies, to bring about improvements in Government operations that may include effectiveness, efficiency, service quality, or transformation. It also called for the adoption of innovative information technology, including the appropriate use of commercial best practices. Authority for Maintenance of the System: 5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order 9397.

## **1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

The privacy risk associated with HR Solutions is the scope of information available to users of HR Solutions. This is mitigated by two factors. First, each form and piece of information available in HR Solutions is directly relevant to OCHCO’s mission to perform human resources services to the Department. Without this collection no human resources management would occur within Headquarters. Second, each HR Solutions user is properly vetted with security clearance and has received the appropriate security and privacy training. This ensures that any misuse or improper access to data is met with sanctions and accountability.



## Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### 2.1 Describe all the uses of information.

HR Solutions utilizes a file share for storage of PII information for HR operations outlined below.

Personnel and Payroll processing to deliver the following functions to DHS:

- Processes SF-52 personnel action requests, SES actions, awards, payroll and benefit documents (eg. Fed/State, Direct Deposit, FEHB, TSP, VLTP, etc.), garnishments, and student loan repayment
- Resolve Suspense Inquiry and Correction (SINQ) errors, History Correction and Update (HCUP), and Special Payroll Processing System (SPPS) actions
- Job code and position builds
- Time and Attendance (T&A) document tracking, filing, and mailing
- Support new hire orientation, employment verification, and requesting prior service.

Recruitment to deliver the following functions to DHS:

- Work with the DHS management on the design, development, implementation, and evaluation of the DHS corporate recruitment strategic programs
- Assess current recruitment program efforts, design metrics for measuring success of efforts and recommend programmatic improvements
- Develop portfolios for DHS positions to assess and monitor recruitment efforts specific to each position or cluster of similar positions
- Support DHS managers and the corporate recruitment team including the members of the recruitment council in outreach and recruiting efforts including, but not limited to, job fairs, college campuses, advertising and job announcements, professional organizations, etc.

Staffing, Hiring, and Benefits to deliver the following functions to DHS:

- Conduct job analysis by using the results of the job analysis and job description to develop any unique agency-specific selection criteria
- Create and posts vacancy announcements on USA Jobs
- Perform all application process steps within the principles of OPM and the Partnership for Public Service
- Track and manage the receipt of applications from candidates, including those collected at job fairs and other recruitment events
- Provide and/or collect from applicants all necessary paperwork
- Capture voluntary self identification of Race and National Origin Identification (SF-181) data and other applicant flow requirements of MD-715
- Maintain a history of qualification determinations made on candidates to ensure consistency
- Ensure pre-employment requirements are met; (e.g. security, physical, citizenship requirements)



- Conduct applicant rating and ranking against established qualification and eligibility requirements and standards including any positive education requirements and/or professional licensure, certification, credentialing requirements, incorporate appropriate rules; (e.g. those related to area of consideration, veterans' preference) and evaluate applicants against those rules
- Rate and rank applicants based on specified assessment criteria, and place "Best Qualified" and "Qualified" candidates appropriately on referral list(s), to include adjudicating candidates' Veteran Preference status.

It should be noted that these types of transactions do not occur on the HR Solutions platform. These transactions occur in other DHS and USDA systems. These transactions may be tasked to individuals within HR Solutions, and an employee's information may be accessed on HR Solutions, but the actions which this information supports are conducted on other systems.

The Action Tracker uses PII to simply task OCHCO employees.

## **2.2 What types of tools are used to analyze data and what type of data may be produced?**

The Action Tracker has data validation routines built into the interface that checks for required fields, data types, and data ranges. Additionally, the business logic layer processes data before it is committed to the database, checking the data against business logic for accuracy and consistency.

Monthly status reports and other ad hoc reports may be generated electronically and printed for hard copy use, if necessary. They are the reports submitted to OCHCO to track status of work volume, or submit formal reports to oversight agencies (e.g., Government Accountability Office (GAO), Office of Management and Budget (OMB), OPM).

## **2.3 If the system uses commercial or publicly available data please explain why and how it is used.**

The HR Solutions system does not use commercial or publicly available data.

## **2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

Given the amount and type of information collected, robust auditing functions are built into general support the system to provide an audit trail sufficient to reconstruct security relevant events. Additionally, the system will be able to create, maintain, and protect from modification or unauthorized access or destruction of audit trail of accesses to the objects it protects.





## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 What information is retained?

HR Solutions contains all of the forms listed in Section 1 of this PIA, as they pertain to any DHS Headquarters and some component employees. Within those forms, PII is present and will be retained as part of the form.

### 3.2 How long is information retained?

Although currently not approved by NARA, the HR Solutions system will comply with the National Archives Records Administration (NARA) Retention Schedule for civilian personnel records relating to recruitment. Merit Promotion and Delegated Examining Unit (DEU) cases are retained mainly for the purpose of appeals from applicants who were not selected and/or not found qualified. There are numerous categories for hiring-related files with varying retention periods under the General Records Schedule, Transmittal No. 15, September 2005. Two (2) years is the maximum time period for retention of any such records.

After two years, the SF-50, Notification of Personnel Action, is stored in the eOPF along with the position description. The employee's eOPF is placed in the National Personnel Records Center and is held for 65 years post termination per the retention schedule of the records retention center. The request for personnel action, position description, and any other supporting documentation are retained in an employee working/payroll file. This file is kept as long as the employee is working for DHS. Once the employee has transferred or separated, the working/payroll file is destroyed. The working/payroll file concerns things such as taxes and direct deposit information, which is no longer used after the employee transfers or separated.

The Action Tracker will comply with National Archives Records and Administration (NARA) retention schedule GRS 23.8 (Tracking and Control Records) that are currently covered by GRS1.

### 3.3 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

No, but OCHCO is currently working with the DHS Senior Records Officer for formal submission to NARA.

### 3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

The purpose of retaining the information is to provide DHS the capability to serve the human resources needs of OCHCO. The data will be used to respond to any human resources issues including but not limited to time attendance, recruitment, payroll, Equal Employment Opportunity (EEO) issues or law suits, and disciplinary actions. Retaining these records in accordance with GRS 1, which has a fairly limited



retention period, will help to mitigate attendant privacy risks associated with maintaining these records.

## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

### **4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

The information that is saved and stored on the HR Solutions Shared Space is shared among DHS CHCO and component HR staff where the human resources request was originated. Component human resources staff currently includes the various offices and directorates considered DHS Headquarters and the Federal Emergency Management Agency (FEMA). Services may possibly be extended to other components in time. Direct physical access to the file share is limited to personnel physically located at OCHCO headquarters or at the contractor facility.

### **4.2 How is the information transmitted or disclosed?**

An inbound only VPN connection for DHS CHCO users located at OCHCO headquarters. provides access to the HR Solutions file share located at a contractor site. Personnel not physically located at OCHCO or at the contractor facility do not have access to the file share.

The Action Tracker does not transmit data to any other system other than the tasks itself is issuing. The data is only accessible to users who have been granted access (manager, representative, user or executive) to the system by DHS.

### **4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

Given the nature of the system, internal organizational components will utilize the system to track personnel actions. The system employs role-based security by organization which limits internal sharing of data. Records are maintained in a secured environment with access limited to authorized personnel whose duties require access. The system is specifically designed to be a partially closed network, with the only connection being with OCHCO. Even in those instances, OCHCO does not have full read/write access unless OCHCO retrieves for download the documents back to its own network.



## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

### **5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

The HR Solutions System and the Action tracker do not provide access to external organizations for information sharing nor is it integrated in any way with other systems. The Action Tracker facilitates the workflow of various HR functions and will prompt HR Solutions human resources specialist/admin personnel to perform HR related tasks in other systems. For example, as part of a task an HR Solutions user may be directed to the USDA's NFC. Those external systems include:

- eOPF (USDA)
- EmpowHR (USDA)
- WebTA (USDA)
- NFC Corporate (USDA)
- eRecruitment/USAJobs (DHS and OPM)

### **5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.**

External systems may receive data from DHS HR Solutions users by an update to information sets. For example, an employee's payroll information may have an error preventing them from receiving direct deposit paychecks. An HR Solutions user would update the NFC should any information be inaccurate or mistaken.

Other than sharing on a case by case basis, no information is shared en masse.

### **5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

Data updates and exchanges are completed within the confines of an IT system. No data is directly transmitted.



## **5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

No direct external sharing of information is allowed in HR Solutions. Other external systems may receive updates or new information from HR Solutions users (e.g., opening a new employee's profile in WebTA or the NFC), but this is completed on a single employee transaction basis. No information is exchanged en masse from HR Solutions to any other external systems. .

## **Section 6.0 Notice**

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

### **6.1 Was notice provided to the individual prior to collection of information?**

Human resources specialist/admin personnel within DHS utilize the HR Solutions system to access and store personnel information for specific uses. Notice provided to individuals prior to the collection of information may take place at an earlier stage, in the HR processes and prior to individual data being stored on the system. It is not a function or requirement of HR Solution's HR specialist/admin personnel to provide notice to users in order to save personnel files on the data share for storage and information sharing among HR processes.

### **6.2 Do individuals have the opportunity and/or right to decline to provide information?**

In every case, individuals have proactively sought to provide DHS with PII, whether it is for existing or prospective employment. Any right to decline to provide information is exercised when choosing to be employed or seek employment with DHS.

### **6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

The rights of individuals and uses of personnel information should be addressed with appropriate applicants/employees during HR processes, and prior to storing personnel data onto HR Solutions. The HR Solutions System provides access to HR Specialist/Admin personnel to perform HR functions. Individuals, such as an applicant or an employee, who do not consent to HR operations to be performed should address this at a phase in which it can be determined if there is a need to save and store individual information on the HR Solutions System.

The following OPM government-wide system of records notices apply to the information in the HR Solutions system:

OPM/GOVT-1, General Personnel Records, 71 Fed. Reg. 35, 341 (June 19, 2006).

OPM/GOVT-5, Recruiting, Examining, and Placement Records, 71 Fed. Reg. 35,341, 35,351 (June 19,



2006)

## **6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

Information within the HR Solutions system comes from the individuals, such as an applicant or employee, to whom it applies or is derived from information the individual supplied. Notice may be provided at the original point of collection, but notice is not provided to individuals via the HR Solutions system because HR Solutions is a purely internal OCHCO system.

## **Section 7.0 Access, Redress and Correction**

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

### **7.1 What are the procedures that allow individuals to gain access to their information?**

The HR Solutions only provides access to HR personnel to perform HR functions related to individuals that are employed or being employed within DHS. There are no procedures that allow individuals to gain access to their own information within the HR Solutions system. Access control mechanisms are in place to only allow authorized users to access HR Solutions and the Action Tracker. Almost all systems with which HR Solutions relates allow individual employees to review their own information, and edit it as necessary. HR Solutions does not provide such access.

### **7.2 What are the procedures for correcting inaccurate or erroneous information?**

HR Solutions provides a data repository for personnel data. Erroneous information is corrected once made known to the contractor or federal employee that has access to HR Solutions. If a revised document is submitted that corrects previous incorrect information, the revised document is annotated as the most recent and correct document.

Managers and representatives have the authority to change, edit, or correct data that is found to be invalid within the Action Tracker. The Action Tracker does validate data against secondary systems. It is the sole responsibility of the users (manager, and representative roles) to correct invalid data within the system.

### **7.3 How are individuals notified of the procedures for correcting their information?**

In some ways HR Solutions is designed to correct the information of the several systems in use for DHS human resources. HR Solutions and the Action Tracker do not follow procedures for correcting personnel information that is stored within the system itself. This question does not apply to HR Solutions.



## **7.4 If no formal redress is provided, what alternatives are available to the individual?**

HR Solutions and the Action Tracker do not follow procedures for correcting personnel information that is stored within the system. This question does not apply to HR Solutions.

## **7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

HR Solutions is specifically designed to resolve any inaccuracies in HR data that are discovered through daily OCHCO operations. Data of HR Solutions may be edited, but such information is simple and any privacy risks are minimal. HR Solutions is not the primary collector of data, and most if not all of HR Solutions' source systems provide direct access and redress to its users, i.e., employees.

## **Section 8.0 Technical Access and Security**

The following questions are intended to describe technical safeguards and security measures.

### **8.1 What procedures are in place to determine which users may access the system and are they documented?**

The HR Solutions system users include a team of DHS and multiparty contract personnel. Per the system security documentation, system administrators have right to administer operations and maintenance.

The Action Tracker system users include contractor support, DHS, DHS components, and contractors. All user accounts must be authorized and granted by DHS before user accounts can be activated.

### **8.2 Will Department contractors have access to the system?**

Yes. OCHCO utilizes several contractors to fulfill several roles including reporting, IT support, operations and maintenance, payroll, staffing support, and recruitment.

### **8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

DHS coordinates PII training with DHS Privacy Office to be administered to all Federal and contract employees of OCHCO annually.

### **8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

As with other OCHCO enterprise systems, the Certification and Accreditation (C&A) documentation for HR Solutions is currently under development. This system is in the development phase of the System Development Life Cycle. The initial C&A for HR Solutions is scheduled for July 31, 2008. At this time, the



system will comply with FISMA requirements. The DHS Risk Management System Application will be used to create, maintain and update the C&A for the System. The HR Solutions will secure data in accordance with NIST SP-800-53, SP-800-37, SP-800-18, SP-800-30, FIPS 199 (MMM), and E-Authentication (assurance level 2).

## **8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

The HR Solutions uses audit capabilities to record system events. The HR Solutions System generates audit records for the following events:

- Account Logon and Logoff
- Directory Service Access
- Object Access
- Policy Change
- System Events
- Failed authentication attempts
- File creation and deletion
- Account creation and deletion
- Account changes
- Account privilege changes
- Server startup and shutdown

Audit records are planned to be transmitted in real time to the Stennis Data Center for system monitoring.

## **8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

All DHS employees and contractors are required to take mandatory security and privacy training prior to accessing a Federal system. This security and privacy training course includes an overview on privacy and personally identifiable information and its appropriate uses. Further, all actions on the system are logged and maintained to ensure accountability.

## **Section 9.0 Technology**

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

### **9.1 What type of project is the program or system?**

The HR Solutions will serve as a General Support System, which serves as a data repository. The system will employ, a patch management, print, anti-virus server provides software updates to Windows operating system as well as anti-virus updates. The file servers store the project related personnel files. An additional web and database server operates the Action Tracker minor application for Case/Workload Management.



Users of the HR Solution system are responsible for providing DHS functions in recruitment, staffing, hiring, benefits, and payroll processing.

## **9.2 What stage of development is the system in and what project development lifecycle was used?**

DHS has established the System Lifecycle Management process to oversee the various technical, security, and quality aspects of its technology projects and to manage the integration of technology into the DHS organization. NIST SP 800-64 is used to support the system development lifecycle approach. Currently the HR Solutions system is in the Acquisitions/Development stage. The System Security Plan, 800-53 self assessment, Security Assessment Report and Risk assessment is currently being reviewed for final approval.

## **9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.**

No.

## **Responsible Officials**

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## **Approval Signature**

Original signed and on file with the DHS Privacy Office.

Hugo Teufel III  
Chief Privacy Officer  
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