



## ***InCompass, Privacy Impact Assessment (PIA)***

***8/3/2011***

### **A. Identification**

System Name: InCompass  
Former System Name: Integrated Talent Management (ITM)  
OMB Unique Identifier: 015-00-01-13-01-1261-24  
System Owner: DASHR/CHCO and HRCPO, for all HR Connect Customers

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### **B. System / Application General Information**

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

Yes

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

*InCompass is a comprehensive talent management system that incorporates the following functional modules:*

- *Learning*
- *Connect*
- *Performance*
- *Succession*
- *Extended Enterprise*

*The Learning module supports the management and tracking of training events and individual training records. Training events may be instructor led or online.*

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*Courses may be managed within the system to provide descriptions, availability, and registration. Online content is stored on the system. Training information stored for individuals includes courses completed, scores, and courses registered for.*

*The Connect module supports employee collaboration efforts. Features include communities of practice, expertise location, blogs, and knowledge sharing support. Profile information that may be stored by the system includes job position, subject matter expertise, and previous accomplishments.*

*The Performance module supports management of organizational goals and alignment of those goals to individual performance. The module supports managing skills and competencies for the organization. The module also supports employee performance reviews. The types of information gathered about employees include their skills, competencies, and performance evaluation.*

*The Succession module supports workforce management and planning. The type of information gathered for this module includes prior work experience, skills, and competencies.*

*The Extended Enterprise module supports delivery of training outside of the organization. Training provided may be for a fee. The type of information collected for this module includes individual data for identifying the person for training records management and related information for commercial transactions.*

3. What legal authority authorizes the purchase or development of this application / system?

*- 5 U.S.C. 301; Department regulation for the operations of the Department conduct of employees, distribution and performance of its business, the custody, use, and preservation of its records, papers, and property.*

*- 31 U.S.C. 321; General authorities of the Secretary establishes the mission of the Department of Treasury*

*- e-Government Act of 2002 (H.R. 2458/S. 803) supports government to government services*

4. Under which Privacy Act System of Record Notice (SORN) does this system operate?

*Office of Personnel Management / GOVT-1*

*<https://www.opm.gov/fedregis/2006/71-061906-35363-a.htm>*

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### **C. Data in the System**

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

*Government employees and contractors.*

2. What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

*HRCconnect will provide data to the system. It is possible for other agencies to directly upload data into the system.*

b. What Federal agencies are providing data for use in the system?

*TBD- The system is intended to provide services to other organizations in a fee for service model.*

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

*TBD- The system is intended to provide services to other organizations in a fee for service model. This system applies to only federal customer and contractors. This system will not be used for state or local agencies.*

d. From what other third party sources will data be collected?

*None.*

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

*InCompass will maintain the following types of data:*

- *User*
- *Training Records*
- *Performance*

#### ***User Data Fields:***

<b>Cornerstone Field</b>	<b>Type</b>	<b>Size</b>	<b>Data Specifications</b>	<b>Business Function and Best Practices</b>
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Cornerstone Field	Type	Size	Data Specifications	Business Function and Best Practices
<b>User ID</b>	String	100	<b>Required:</b> Uniquely-assigned user identifier. Usually, this number is the employee number in the client's HR system. On occasion, a security identifier has been used.	Allows the Cornerstone system to uniquely identify every use in its system. Should be unique and not recycled between terminated and new employees. Can be used for authentication.
Username	String	128	Portal login Credential.	Can be used in lieu of User ID for system login. Should be unique. Note: This field is <b>required</b> for all users manually entered or entered through User Upload Tool.
<b>Active</b>	Boolean		Accepts either "true" or "false".	Indicates that the user is able to access the system. Typically, terminated employees have this attribute set to "false". * Not needed if Reconciling Users
<b>Absent</b>	Boolean		Accepts either "true" or "false".	Indicates that the user is on leave, and all workflow requests in Cornerstone will be put on hold or routed to alternate users. Will be defaulted to "false" when blank.
<b>Allow Reconcile</b>	Boolean		Accepts either "true" or "false".	Indicates that the user can be reconciled after the Data Feed is run. If this box is set to "true", the system will automatically deactivate this user if the user is not present in the latest user data file.
<b>Prefix</b>	String	10	Can be any string. Typically, is set to "Mr.", "Ms.", "Mrs.", "Dr.", etc.	
<b>First Name</b>	String	200	<b>Required:</b> The first-name.	<b>The system defined first name</b>
Middle Name	String	200	The middle-name or the initial.	
<b>Last Name</b>	String	200	<b>Required:</b> The last-name.	<b>The system defined last name</b>
Suffix	String	10	The name-suffix. Typically set to "PhD.", "M.D.", "Jr.", etc...	
Email	String	128	SMTP email-address of the user. Must conform to the RFC-822 specification. Required for Virtual Classroom Integration.	Utilized with email triggers to notify users of enrolled, upcoming or pending assignments and/or training activities. Can be used for authentication if unique.

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Cornerstone Field	Type	Size	Data Specifications	Business Function and Best Practices
Phone	String	25	A formatted phone number. May contain international country-codes, no data validation is provided.	This phone could be the Work or Home phone of the user.
Fax	String	25	A formatted fax number.	
<b>Country Code</b>	Enum		<b>Required:</b> A 2-letter or 3-letter code that indicates the country. All does must be conformant with ISO 3166-1. Refer to the Country Code table in the back of this document for the format information.	<b>This defaults to US if nothing is passed.</b>
Line1	String	55	First formatted-address line. Typically SHOULD contain: Street number and name, or rural route, or highway.  (Example: 2250 Ocean Park Blvd.)	
Line2	String	55	Second formatted-address line. Typically SHOULD contain: P.O. Box, Suite, or office number (Examples: Suite 225 or P.O. Box 2259)	
City	String	35	City Name. Can include non- U.S. state information as well (Example: Santa Monica)	
State/Province	Enum	30	<b>Example: 2-letter U.S. State-code</b>	
Postal Code	String	20	Zip code or postal code.	
Division ID	String	100	<b>Required: User's Division ID.</b>	<b>The main system OU utilized for organizing and subdividing many settings, preferences (including look and feel) within the application.</b>
Location ID	String	100	<b>Required: User's Location ID.</b>	<b>The main OU utilized for location tracking of employees and training. Areas of the system will utilize this information to display, for example, ILT training that may be geographically close in proximity.</b>
Position ID	String	100	<b>User's Position ID.</b>	Another way to differentiate users or employees within the system. Sometimes renamed to Job or Job Title.

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Cornerstone Field	Type	Size	Data Specifications	Business Function and Best Practices
Cost Center ID	String	100	<b>User's Cost Center ID.</b>	Utilized to align to business cost centers for accounting and financial tracking purposes.
Grade ID	String	100	<b>User's Grade ID.</b>	Also known as Band, can be used to further differentiate users or employees within the system.
Status	Enum		Must be one of: <ul style="list-style-type: none"> <li>• Not Known</li> <li>• Active</li> <li>• Terminated</li> <li>• On Leave</li> </ul>	Can be used for filtering and/or reporting purposes.
Last Hire Date	Date		The required format is <b>YYYY-MM-DD</b>	Can be used for filtering and/or reporting purposes. Can be used for Proxy enrollment grouping.
Original Hire Date	Date		The required format is <b>YYYY-MM-DD</b>	Can be used for filtering and/or reporting purposes.
Required Approvals	Integer	0-3	Number of approvals required to purchase training. Overrides the required approvals set by the user's OU membership.	System uses to determine required number of training approvals, however other system workflows will also impact whether the required number of approvals is followed or overruled.
Approver ID	String	100	User-Identifier (User ID) of the user's approver. If specified, overrides any approval rules obtained from OU membership.	See training approval workflow diagram to understand the workflow rules.
Manager ID	String	100	User-Identifier (User ID) of the user's direct supervisor.	The primary way the system builds its user hierarchy used throughout the system.
Gender	Enum		Must be one of: <ul style="list-style-type: none"> <li>• Not Known</li> <li>• Male</li> <li>• Female</li> <li>• Not Specified</li> </ul> (Based on ISO gender specification.)	Sometimes utilized for Equality Employment Opportunity assurance and can also be used for various filtering and reporting in Analytics. Reporting Purposes ONLY.
Ethnicity	String	50	Can be any value	Sometimes utilized for Equality Employment Opportunity assurance and can also be used for various filtering and reporting in Analytics. Reporting purposed ONLY.

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Cornerstone Field	Type	Size	Data Specifications	Business Function and Best Practices
CUSTOM OU ID 1	String	100	User's Custom OU ID.	ID related to Custom OU Type created above
CUSTOM OU ID 2	String	100	User's Custom OU ID.	ID related to Custom OU Type created above
CUSTOM OU ID 3	String	100	User's Custom OU ID.	ID related to Custom OU Type created above
CUSTOM Field 1	As Defined in Custom Field Section			
CUSTOM Field 2	As Defined in Custom Field Section			
CUSTOM Field 3	As Defined in Custom Field Section			

### **Training Record:**

*The type of data generated by the system to support training record management includes:*

- *Training event name*
- *Training event date and time*
- *Training event completion status*
- *Training event completion score*
- *Supporting training event data such as instructor and number of hours*
- *Supporting meta-data such as when the activity was recorded and by whom*

### **Performance**

*The type of data generated by the system to support performance related activities includes:*

- *Competencies*

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- *Competency rating*
- *Goals*
- *Performance Assessment*
- *Skills*
- *Supporting meta-data such as when the data was entered and by whom*

### 3. Accuracy, Timeliness, and Reliability

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

*HR data imported into the system is checked for format and completeness during the import process. Users may review and provide feedback on the accuracy of the data in the system.*

- b. How will data be checked for completeness?

*HR data imported into the system is checked for format and completeness during the import process.*

- c. Is the data current?

*HR data is taken from the agency's HR IT system which is the system of record for HR data.*

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

*Users may review and provide feedback on the accuracy of the data in the system.*

- e. Are the data elements described in detail and documented?

*Yes- see above.*

### **D. 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. The data is used to allow the system to make decisions about the appropriate rating targets for competencies, training assignments, and user roles in supporting organization-wide initiatives. The information is also used to support*



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*following up with users to complete training and performance related tasks in the system.*

2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? If so, how will this be maintained?

*No new data or inference of data will be done at the individual level.*

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

*NA*

4. Can the system make determinations about employee/public that would not be possible without the new data?

*NA*

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

*NA*

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

*NA*

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

*NA*

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

*Data may be reviewed through the user interface after authentication to the system. The user interface supports both screens that display the information and reports. The following classes of users will have some type of rights to view the individual's information on a limited basis:*

- *The employee*
- *The employee's supervisor*
- *Human Resource Administrators*

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

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*The following types of reports are available in the system:*

- *Human resource data*
- *Training management*
- *Performance management*

*The reports are used for the following purposes:*

- *Verification of data accuracy*
- *Training management- tracking completion of training, tracking training needs, providing training certificates*
- *Performance management- identifying learning and development needs, finding organizational strengths, tracking organizational goals*

*The following classes of users will have some type of rights to view reports:*

- *The employee- for the employee only*
- *The employee's supervisor- for the supervisor and their subordinates*
- *Human Resource Administrators- for employees for whom they have been granted view permissions for a segment of the population*

### **E. 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?

*A redundant disaster recovery site is maintained. Data is replicated by leveraging Distributed File System (DFS) replication between the primary operational facility in El Segundo CA and the disaster recovery facility in Sterling VA*

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

*The system complies with Department of the Treasury Directive 80-50 Records and Information Management Manual. In accordance with TD 80-50, records are not destroyed or otherwise alienated from the system except in accordance with procedures prescribed in 36 CFR, Part 1228.*

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?

*Treasury officials may not dispose of records prior to authorized disposal date or retain them beyond that date, except in cases of ongoing litigation or enforcement actions. If a program official determines that records need to be retained longer than authorized by the schedule, the Treasury records management officer is contacted to obtain approval from NARA, and if necessary, to revise the schedule.*

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*Data at the end of retention is provided to the Federal Records Center (FRC) in accordance with procedures documented in TD 80-50.*

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

*No*

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

*The system collects and manages training and performance data.*

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

*The system does not track the physical location or perform real-time monitoring of individuals. The system does track their activities on the system such as taking a course or completing an assessment.*

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

*The individual's activities that they perform on the system are tracked. Information collected includes the activity performed, the time, and the outcome of the activity.*

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

*Audit logs are protected from unauthorized access and modifications via the use of firewalls, intrusion detection devices, access polices, etc. as described in the system security plan.*

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

*Office of Personnel Management*

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

*NA*

### **F. Access to Data**

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

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*The following classes of individuals will have access to the data in the system via the user interface:*

- *The employee- for the employee only*
- *The employee's supervisor- for the supervisor and their subordinates*
- *Human Resource Administrators- for employees for whom they have been granted view permissions for a segment of the employee population*

*In addition, a limited number of system administrators who have been cleared by OPM will have direct access to the data.*

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

*Access is granted based upon need. This is generally determined by their responsibility for managing a population's human resource data.*

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

*Access will be restricted based upon need to perform duties for a given segment of the population.*

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

*The system supports restricting views based upon the user's organization.*

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

Yes

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

*At this time other systems do not have direct access to the data.*

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

NA

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

*Access will be restricted only to their organization via restricted views based upon organizations.*

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

*The data will be used to support and manage their human capital management and development initiatives.*

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

*HR System Administrators who have access to the system.*

