

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

05/04/2016

OPDIV:

OS

Name:

Human Resources Employment Processing System

PIA Unique Identifier:

P-6320419-798208

The subject of this PIA is which of the following?

Minor Application (stand-alone)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

Yes

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Agency

Is this a new or existing system?

Existing

Does the system have Security Authorization (SA)?

Yes

Indicate the following reason(s) for updating this PIA.

PIA Validation

Describe in further detail any changes to the system that have occurred since the last PIA.

No changes have been made to the system.

Describe the purpose of the system.

The Human Resources Employment Processing System (HREPS) is a workflow and metrics reporting system used by Office of Human Resources (OHR) designed to enhance the capability of Human Resource (HR) staff as well as hiring managers to proactively manage recruitment actions as they move through the HR process. HREPs tracks all recruitment actions, measures the quality and speed at each step of the recruitment process, and allows hiring managers and/or program officials to check the status of actions within the organizations.

The system will collect the following information: applicant name, date of application submission, and information specific to the vacancy for which the applicant is applying: series, grade, duty location, title and selection status.

The HREPS produces numerous timeline reports outlining the time and steps that have elapsed between recruitment activities and the actual hiring of an employee. For example, a hiring timeline report measures the number of days and steps that have elapsed between the time of recruitment to the time of hire; or the number of days that has elapsed since the vacancy announcement to the generating of a referral list. Referral lists are not part of HREPS. All reports produced provide information about the time it took to complete an action or when an action should have been completed.

Describe the type of information the system will collect, maintain (store), or share.

The system will collect the following information: applicant name, date of application submission, and information specific to the vacancy for which the applicant is applying: series, grade, duty location, title and an indicator of whether or not an applicant was selected to be hired.

A unique identifier is associated with each applicant. The applicant's name is associated with the vacancy announcement number for which they wish to be considered. The unique identifier is a number assigned to the applicant by the talent acquisition system (USA Staffing) at the time the applicant registers with the USA Staffing system.

The talent acquisition system, USA Staffing, does not fit into the HREPS process. Data from USA Staffing is manually extracted every day and loaded into the HREPS database tables in order to generate reports. Therefore, the data does not flow between HREPS and the USA Staffing system.

User credentials for system administrators are stored on the application server which is hosted by the HHS contractor general support system. User credentials for HR and program users/hiring officials are stored in the HREPS database. These credentials include the following: User ID, password, Personal Identity Verification (PIV) Card ID and email address.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

HREPS is a workflow/tracking system used in the Office of Human Resources (OHR) to track ownership and processing time of specific personnel actions that are processed in OHR. The tracking of these items includes the capture or entry of dates of completion of the various steps required to fill a position. The tracking of an action begins with the request from the hiring official to fill a vacancy / hire someone and ends with the entering of the date the hired person starts at the Department of Health and Human Services (HHS).

HREPS receives data from two sources: Enterprise Human Resources and Payroll (EHRP)/Capital HR and USA Staffing. EHRP is the system used to begin the recruitment process. USA Staffing is the vacancy announcement posting/rating and ranking system used by OHR. The data from both sources is a manual load/entry process as there is no connection between the systems. The data is obtained via data queries which produce Excel spreadsheets. The data is then uploaded into HREPS tables and is available for reporting.

The data pulled from EHRP is the number generated to identify a job request and the code for the organization making the request. HREPS receives vacancy announcement and referral data from USA Staffing. The vacancy announcement data includes the following: opening date, closing date, position title, applicant name, the date of the application and applicant ID. The referral data includes the following: identifier of the referral list, creation and expiration date, the applicant ID of the people on the referral list, and offer, acceptance and entrance on duty dates for a person hired.

HREPS is a web-based application that is only available behind the HHS firewall. Users must be either physically at a HHS location or accessing the host network via an HHS secure connection. Users of the system must be identified with a user account and password which is maintained solely by the system administrator. Access to various functions is based on the role of the user as established by the system administrator.

User credentials for system administrators are stored on the application server which is hosted by the HHS contractor general support system. User credentials for HR and program users/hiring officials are stored in the HREPS database. These credentials include the following: User ID, password, PIV Card ID and email address.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Name

E-Mail Address

Date of application submission

Information specific to the vacancy for which the applicant is applying: series, grade, duty location, title

Applicant unique ID

User credentials: User ID, password, PIV Card ID

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Public Citizens

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

1,000,000 or more

For what primary purpose is the PII used?

PII is used to measure the Office of Personnel Management (OPM) "time to hire" or fill a position by tracking the time between receiving the initial communication of the need from a hiring official, to the selection of a candidate.

Metrics derived from the tracking of recruitment actions, measuring the quality and speed at each step of the recruitment process are used to determine the success or failure of the established Service Level Agreement.

The purpose is to produce a report of applicant names. Any hiring official or selecting official with access to HREPS can see the names of individuals who are placed on referral lists for employment consideration. The officials have already seen these names on the USA Staffing listing. The hiring official or selecting official includes staff from the following Operating Divisions: Centers for Disease Control and Prevention, Food and Drug Administration, the Administration on Aging, the Health Resources and Services Administration, Centers for Medicare & Medicaid Services, Agency for Healthcare Research and Quality, Office of the Secretary (OS), Substance Abuse and Mental Health Services Administration.

Describe the secondary uses for which the PII will be used.

The PII data (Name) can be used in the answering of Equal Employment Opportunity (EEO)

complaints. For example, a request for a listing of all vacancies for which an applicant has applied for is a common request.

Identify legal authorities governing information use and disclosure specific to the system and program.

Pub.L. 95-454, The Civil Service Reform Act of 1978; 5 U.S.C. 2101, Civil Service, Armed Forces, Uniformed Services; 5 U.S.C. 2102, The Competitive Service; 5 U.S.C. 2103, Excepted Service; 5 U.S.C. 2108, Veteran, Disabled Veteran, Preference Eligible; 5 U.S.C. 3309 through 3318, Direct Hire Authority; 42 U.S.C. §§ 209(f) and (g), Appointment of Personnel.

Are records on the system retrieved by one or more PII data elements?

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

09-90-0019 (special employment program placements)

OPM/GOVT-5 (recruitment); 09-90-0006 (applicants);

OPM/GOVT-1 (current employees--relevant only once hiring is complete);

Identify the sources of PII in the system.

Government Sources

Within OpDiv

Other HHS OpDiv

Other Federal Entities

Identify the OMB information collection approval number and expiration date

Not applicable. The information in HREPS is not collected directly from the public. Application information is provided via OPM's USA Staffing system.

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Other Federal Agencies

OPM's USA Staffing system

Describe any agreements in place that authorizes the information sharing or disclosure.

There is no MOU in place between HREPS and any other system.

Describe the procedures for accounting for disclosures.

Disclosures from this system are unlikely to be made, except in furtherance of the primary purpose of the system. If any nonstandard disclosures were to be made for any unanticipated reason, such that the disclosure was not a routine use, the system owner would maintain a record in a designated file.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

HREPS' source of PII is from multiple systems, as a result there is no opt-out method in place.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

HREPS' source of PII is from multiple systems, as a result there is no opt-out method in place.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

There is no process in place to notify individuals whose PII is in HREPS. The PII that is contained in HREPS is obtained from other systems.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

Applicant information is passed from USA Staffing system. Individuals/Applicants do not interact with HREPS. USA Staffing applicant information comes directly from the applicant on a voluntary basis, so we have to assume it is timely, accurate, and relevant. Applicants have the capability to update their profile information online via Application Manager. Most job vacancies list a point of contact for applicants. Applicants may contact the agency representative and request changes to their information that is not accessible to them via Application Manager. The USA Staffing system Help Desk also responds to applicant requests related to erroneous or inaccurate information and refers those users to their respective agency Human Resources Management personnel to support those issues. Onboarding Manager users can update applicant information online. Once this information is submitted via Enterprise Human Resources Interface (EHRI) for filing into the electronic personnel file, the user must work through their human resource office to correct the data.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

As the HREPS' source of PII is from multiple systems and HREPS is a tracking system that counts actions and the time to produce those actions, HREPS relies on the source systems to ensure the accuracy and relevance of the data.

In the event data changes in the source system, i.e., a name change or an email address change, the HREPS system administrator is notified by email and requested to implement the change in the HREPS database. If additional data elements are incorrect in HREPS when reviewing reports, the process is to reload data from the source system to ensure accuracy.

Identify who will have access to the PII in the system and the reason why they require access.

Users:

To view applicant information for processing

Administrators:

To track and view metrics of actions

Developers:

To create reports that accurately present information

Contractors:

To view applicant information for processing, and to track and view metrics of actions.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Level of access is determined by the user role. All roles except Administrator are limited to read only access. Access accounts are locked after 60 days of inactivity. Quarterly reviews of login activity are used to deactivate accounts. Accounts are also deactivated when request is received from account

holder's supervisor.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

HREPS shares different data elements based on the user's role, but the PII element (name) is required by all users to perform their job functions as determined by least privilege.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

The HHS Office of the Secretary complies with the Federal Information Security Management Act's (FISMA) requirement that all agencies require all system users (employees and contractors) to be exposed to privacy and security awareness materials, at least annually and prior to the employee's use of, or access to, information systems.

Current trainings include: Information Systems Security Awareness and Privacy Awareness Training.

Describe training system users receive (above and beyond general security and privacy awareness training).

No additional privacy or security awareness training is provided as a result of a user having access in HREPS.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

Data in HREPS are currently retained indefinitely as we often have to produce reports that show trends in timelines or processing over past years to present. Records are retained until there is no further administrative need to retain them, or in the case of a Federal employee, the individual leaves the jurisdiction of the operating office, and are then either destroyed, or, if appropriate, are combined with the Official Personnel Folder, which is forwarded to the hiring Federal agency or, if the employee is leaving Federal service, to the National Personnel Records Center. The scheduling and retention of data collected is a requirement for the HREPS system under the HHS Records Management and Disposition guidelines. The records will be retained and disposed of in accordance with National Archives and Records Administration's (NARA) General Records Schedule 2 (GRS 2).

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

The system has undergone required security reviews to ensure management, operational, and technical controls have been implemented commensurate with the security categorization of the system. These security controls including identity and access management controls. PII handlers of this system have signed the HHS Rules of Behavior and are trained in the appropriate handling of the PII in the system.

Administrative controls in place for HREPS include rules of behavior that all users must accept prior to using the system, and security awareness and training required for all HHS employees. Technical controls in place include: users must be signed into the HHS network, (inside the HHS firewall), use of a unique user ID and strong password to log into the system, Secure Socket Layer (SSL) for secure sessions. HREPS also utilizes Homeland Security Presidential Directive 12 (HSPD 12/SmartCard) login access. The use of an intrusion detection system and firewall to protect network resources. HHS has implemented the physical controls which include a fire suppression system, redundant generators, badge access, and escorts required for guests entering the building.