



Privacy Impact Assessment

Human Resources Support System (HRSS)

Revision: 1

U.S. Forest Service

Date: June 2009



Document Information

Owner Details	
Name	Jerry Pearson
Contact Number	703-605-4587
E-mail Address	jpearson@fs.fed.us

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Revision	Date	Author	Comments
4	June 2009	Justin Davis	

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	U. S. Forest Service
System Name:	Human Resources Support System
System Type:	<input type="checkbox"/> Major Application <input checked="" type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	HRSS is a GSS hosted at GDCI Inc. that is comprised of the following eight HCM applications: eForms, ePM, Paycheck8, PPM, Retirement Calculator, Uniform Allowance, Uniform Vendor, and Unit Purchase.
Who owns this system? (Name, agency, contact information)	USDA Forest Service owns the data, and GDCI Inc. owns the hardware and facilities.
Who is the security contact for this system? (Name, agency, contact information)	Jerry Pearson, USDA Forest Service, 703-605-4587, jpearson@fs.fed.us Justin Davis, USDA Forest Service, 703-605-0850, jtdavis@fs.fed.us
Who completed this document? (Name, agency, contact information)	Justin Davis, USDA Forest Service, 703-605-0850, jtdavis@fs.fed.us



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Personnel data
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	Privacy Act
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Employees, NFC
4.1	What data is being collected from the customer?	Personnel data
4.2	What USDA agencies are providing data for use in the system?	Forest Service and NFC
4.3	What state and local agencies are providing data for use in the system?	n/a
4.4	From what other third party sources is data being collected?	n/a
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Based on business rules of the system
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Based on business rules of the system
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	n/a

2.2 Data Use

No.	Question	Response
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No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Personnel data required to complete business functions
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	Based on the business rules of the system
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Personnel data required to complete routine business functions
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	eAuthentication, encryption
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.



No.	Question	Response
13.1	What controls are in place to protect the data and prevent unauthorized access?	eAuthentication, encryption

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The NFC is the database of record, so the stored data is always compared to that to ensure accuracy, relevance, and completeness.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	



2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Individual data is accessible by the individual as well as others to whom the individual grants that access. Administrators have access to all individual's data except for SSN's, as do system administrators, and developers.
21	How will user access to the data be determined?	eAuthentication
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	User ID and Password verification
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	The System Owner ultimately is responsible for the security of the system and the privacy rights of individuals. GDCII is responsible for the security of the data. connectHR provides identification and authentication services used to limit access to authorized individuals. The security controls are documented in the System Security Plan. The C&A activity is in place to ensure the Forest Service that GDCI is meeting its obligations.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Phone or writing
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	



No.	Question	Response
27	<p>Consider the following:</p> <ul style="list-style-type: none"> ▪ Consolidation and linkage of files and systems ▪ Derivation of data ▪ Accelerated information processing and decision making ▪ Use of new technologies <p>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	Business rules of the system will be followed
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	employee number, social security number, etc.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	Privacy Act SOR USDA/OP-1 Personnel and Payroll System for USDA Employees
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.



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No.	Question	Response
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF
INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

_____ Human Resources Support System (HRSS) _____
(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager/Owner Date
OR Project Representative
OR Program/Office Head.

Agency's Chief FOIA officer Date
OR Senior Official for Privacy
OR Designated privacy person

Agency OCIO Date