



Privacy and Civil Liberties Impact Assessment for the

## HRConnect System

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### **Bureau Reviewing and Certifying Official**

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## Section 1: Introduction

It is the policy of the Department of the Treasury (“Treasury” or “Department”) and its Bureaus to conduct a Privacy and Civil Liberties Impact Assessment (“PCLIA”) when [personally identifiable information](#) (“PII”) is maintained in a system or by a project. PCLIA’s are required for all systems and projects that collect, maintain, or disseminate [PII](#), regardless of the manner in which the information is retrieved.

This assessment is being completed pursuant to Section 208 of the [E-Government Act of 2002](#) (“E-Gov Act”), 44 U.S.C. § 3501, Office of the Management and Budget (“OMB”) Memorandum 03-22, “[OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002](#),” and Treasury Directive 25-07, “[Privacy and Civil Liberties Impact Assessment \(PCLIA\)](#),” which requires Treasury Offices and Bureaus to conduct a PCLIA before:

1. developing or procuring [information technology](#) (“IT”) systems or projects that collect, maintain or disseminate [PII](#) from or about members of the public, or
2. initiating a new collection of information that: a) will be collected, maintained, or disseminated using [IT](#); and b) includes any [PII](#) permitting the physical or online contacting of a specific individual, if identical questions have been posed to, or identical reporting requirements imposed on, 10 or more persons. Agencies, instrumentalities, or employees of the federal government are not included.

This PCLIA provides the following information regarding the system or project:

- (1) an overview of its purpose and functions;
- (2) a description of the information collected;
- (3) a description of the how information is maintained, used, and shared;
- (4) an assessment of whether the system or project is in compliance with federal requirements that support information privacy; and
- (5) an overview of the redress/complaint procedures available to individuals who may be affected by the use or sharing of information by the system or project.

This PCLIA supersedes the Privacy Impact Assessment for this system dated October 2016.

## Section 2: Definitions

**Agency** – means any entity that falls within the definition of the term “executive agency” as defined in 31 U.S.C. § 102.

**Certifying Official** – The Bureau Privacy and Civil Liberties Officer(s) who certify that all requirements in TD and TD P 25-07 have been completed so a PCLIA can be reviewed and approved by the Treasury Deputy Assistant Secretary for Privacy, Transparency, and Records.

**Collect (including “collection”)** – means the retrieval, receipt, gathering, or acquisition of any PII and its storage or presence in a Treasury system. This term should be given its broadest possible meaning.

**Contractors and service providers** – are private companies that provide goods or services under a contract with the Department of the Treasury or one of its bureaus. This includes, but is not limited to, information providers, information processors, and other organizations providing information system development, information technology services, and other outsourced applications.

**Data mining** – means a program involving pattern-based queries, searches, or other analyses of 1 or more electronic databases, where – (a) a department or agency of the federal government, or a non-federal entity acting on behalf of the federal government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals; (b) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and (c) the purpose of the queries, searches, or other analyses is not solely – (i) the detection of fraud, waste, or abuse in a government agency or program; or (ii) the security of a government computer system.

**Disclosure** – When it is clear from its usage that the term “disclosure” refers to records provided to the public in response to a request under the Freedom of Information Act (5 U.S.C. § 552, “FOIA”) or the Privacy Act (5 U.S.C. § 552a), its application should be limited in that manner. Otherwise, the term should be interpreted as synonymous with the terms “sharing” and “dissemination” as defined in this manual.

**Dissemination** – as used in this manual, is synonymous with the terms “sharing” and “disclosure” (unless it is clear from the context that the use of the term “disclosure” refers to a FOIA/Privacy Act disclosure).

**E-Government** – means the use of digital technologies to transform government operations to improve effectiveness, efficiency, and service delivery.

**Federal information system** – means a discrete set of information resources organized for the collection, processing, maintenance, transmission, and dissemination of information owned or under the control of a federal agency, whether automated or manual.

**Final Rule** – After the NPRM comment period closes, the agency reviews and analyzes the comments received (if any). The agency has the option to proceed with the rulemaking as proposed, issue a new or modified proposal, or withdraw the proposal before reaching its final decision. The agency can also revise the supporting analyses contained in the NPRM (e.g., to address a concern raised by a member of the public in response to the NPRM).

**Government information** – means information created, collected, used, maintained, processed, disseminated, or disposed of by or for the federal government.

**Individual** – means a citizen of the United States or an alien lawfully admitted for permanent residence. If a question does not specifically inquire about or an issue does not clearly involve a [Privacy Act system of records](#), the term should be given its common, everyday meaning. In certain contexts, the term individual may also include citizens of other countries who are covered by the terms of an international or other agreement that involves information stored in the system or used by the project.

**Information** – means any representation of knowledge such as facts, data, or opinions in any medium or form, regardless of its physical form or characteristics. This term should be given the broadest possible meaning. This term includes, but is not limited to, information contained in a [Privacy Act system of records](#).

**Information technology (IT)** – means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency, if the equipment is used by the executive agency directly or is used by a contractor under a contract with the executive agency that requires the use: (i) of that equipment; or (ii) of that equipment to a significant extent in the performance of a service or the furnishing of a product. It includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services), and related resources; but does not include any equipment acquired by a federal contractor incidental to a

federal contract. Clinger-Cohen Act of 1996, 40 U.S.C. § 11101(6).

**Major Information system** – embraces “large” and “sensitive” information systems and means “a system or project that requires special management attention because of its importance to an agency mission; its high development, operating, or maintenance costs; or its significant role in the administration of agency programs, finances, property, or other resources.” OMB Circular A-130, § 6.u. This definition includes all systems that contain [PII](#) and are rated as “MODERATE or HIGH impact” under Federal Information Processing Standard 199.

**National Security systems** – a telecommunications or information system operated by the federal government, the function, operation or use of which involves: (1) intelligence activities, (2) cryptologic activities related to national security, (3) command and control of military forces, (4) equipment that is an integral part of a weapon or weapons systems, or (5) systems critical to the direct fulfillment of military or intelligence missions, but does not include systems used for routine administrative and business applications, such as payroll, finance, logistics, and personnel management. Clinger-Cohen Act of 1996, 40 U.S.C. § 11103.

**Notice of Proposed Rule Making (NPRM)** – the Privacy Act (Section (J) and (k)) allow agencies to use the rulemaking process to exempt particular systems of records from some of the requirements in the Act. This process is often referred to as “notice-and-comment rulemaking.” The agency publishes an NPRM to notify the public that the agency is proposing a rule and provides an opportunity for the public to comment on the proposal before the agency can issue a final rule.

**Personally Identifiable Information (PII)** –any information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

**Privacy and Civil Liberties Impact Assessment (PCLIA)** – a PCLIA is:

- (1) a *process* conducted to: (a) identify privacy and civil liberties risks in systems, programs, and other activities that maintain [PII](#); (b) ensure that information systems, programs, and other activities comply with legal, regulatory, and policy requirements; (c) analyze the privacy and civil liberties risks identified; (d) identify remedies, protections, and alternative or additional privacy controls necessary to mitigate those risks; and (e) provide notice to the public of privacy and civil liberties protection practices.
- (2) a *document* that catalogues the outcome of that privacy and civil liberties risk assessment process.

**Protected Information** – as the term is used in this PCLIA, has the same definition given to that term in TD 25-10, Section 4.

**Privacy Act Record** – any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, the individual’s education, financial transactions, medical history, and criminal or employment history and that contains the individual’s name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph. 5 U.S.C. § 552a (a)(4).

**Reviewing Official** – The Deputy Assistant Secretary for Privacy, Transparency, and Records who reviews and approves all PCLIA as part of her/his duties as a direct report to the Treasury Senior Agency Official for Privacy.

**Routine Use** – with respect to the disclosure of a record outside of Treasury (i.e., external sharing), the sharing of such record for a purpose which is compatible with the purpose for which it was collected 5 U.S.C. § 552a(a)(7).

**Sharing** – any Treasury initiated distribution of information to government employees or agency contractors or grantees, including intra- or inter-agency transfers or exchanges of Treasury information, regardless of whether it is covered by the Privacy Act. It does not include responses to requests for agency records under FOIA or the Privacy Act. It is synonymous with the term “dissemination” as used in this assessment. It is also synonymous with the term “disclosure” as used in this assessment unless it is clear from the context in which the term is used that it refers to disclosure to the public in response to a request for agency records under FOIA or the Privacy Act.

**System** – as the term used in this manual, includes both federal information systems and information technology.

**System of Records** – a group of any records under the control of Treasury from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual. 5 U.S.C. § 552a (a)(5).

**System of Records Notice** – Each agency that maintains a system of records shall publish in the *Federal Register* upon establishment or revision a notice of the existence and character of the system of records, which notice shall include: (A) the name and location of the system; (B) the categories of individuals on whom records are maintained in the system; (C) the categories of records maintained in the system; (D) each routine use of the records contained in the system, including the categories of users and the purpose of such use; (E) the policies and practices of the agency regarding storage, irretrievability, access controls, retention, and disposal of the records; (F) the title and business address of the agency official who is responsible for the system of records; (G) the agency procedures whereby an individual can be notified at her/his request if the system of records contains a record pertaining to him; (H) the agency procedures whereby an individual can be notified at her/his request how she/he can gain access to any record pertaining to him contained in the system of records, and how she/he can contest its content; and (I) the categories of sources of records in the system. 5 U.S.C. § 552a (e)(4).

**System Owner** – Official responsible for the overall procurement, development, integration, modification, or operation and maintenance of a system.

## **Section 3: System Overview**

### **Section 3.1: System/Project Description and Purpose**

The purpose of the HRConnect system is to support the human resources functions for the Department of the Treasury and other federal agencies that use HRConnect as part of a cross-services initiative to reduce federal government expenditures. HRConnect is the Treasury’s Government-wide Human Resources Line of Business (HRLoB) Shared Services Center (SSC) online personnel management system that provides managers, supervisors, employees, and personnel specialists with desktop access to personnel and payroll data. HRConnect consists of a general support system (GSS) and a Major Application (MA) (also known as PaaS and SaaS); customized PeopleSoft HR software residing on the Oracle Cloud Infrastructure’s GovCloud Infrastructure as a Service (IaaS) Cloud Service Provider (CSP). The federal agencies (or components of those agencies) that use HRConnect are:

- Department of the Treasury
- Department of Agriculture, Office of the Chief Information Officer – CTS (Client Technology Services)
- U. S. Agency for International Development (USAID)
- Architectural and Transportation Barriers Compliance Board (US Access Board)
- Department of Commerce:
  - Office of the Secretary
  - Economic Development Administration
  - Bureau of Economic Analysis
  - National Oceanic and Atmospheric Administration
  - International Trade Administration
  - U. S. Patent and Trademark Office
  - National Institute of Standards and Technology
  - Minority Business Development Agency
  - National Telecommunications and Information Administration
  - National Technical Information Service
  - Bureau of the Census
  - Office of the Inspector General
  - Office of Inspector General

- Economics and Statistics Administration
- Bureau of Industry and Security
- Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives
- Department of Labor
- Denali Commission
- Federal Reserve, Bureau of Consumer Financial Protection (BCFP)
- Gulf Coast Ecosystem Restoration Council (GCERC)
- Office of Government Ethics (OGE)
- Federal Housing Finance Agency OIG (FHFA OIG)
- Department of Homeland Security, U.S. Secret Service (USSS)
- Department of Housing and Urban Development (HUD)
- Department of Housing and Urban Development, HUD Office Inspector General
- Government Accountability Office (GAO)
- United States Congress, Commission on Security and Cooperation in Europe (CSCE)
- Armed Services Retirement Home (AFRH)
- Federal Mine Safety and Health, Fed Mine Safety Health Rev Com
- Commission on People's Republic of China (CECPRC)
- Veterans Affairs Office of Inspector General (VA OIG)

**Estimated Number of Individuals Whose Personally Identifiable Information is Maintained in the System or by the Project**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 0 – 999           | <input type="checkbox"/> 1000 – 9,999                 | <input type="checkbox"/> 10,000 – 99,999 |
| <input type="checkbox"/> 100,000 – 499,999 | <input checked="" type="checkbox"/> 500,000 – 999,999 | <input type="checkbox"/> 1,000,000+      |

**Section 3.2: Authority to Collect**

The authorities for operating this system or performing this project are:

5 U.S.C. 301 – Department regulations 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 establish the mission of the Department of the Treasury. Homeland Security Presidential Directive 12 (HSPD-12) – requires the development and agency implementation of a mandatory, government-wide standard for secure and reliable forms of identification for Federal employees and contractors.

Treasury Directive 80-05, Records and Information Management Program – establishes the policy of the Department of the Treasury to manage records effectively and efficiently throughout their life cycle in order to facilitate accomplishment of the agency's programmatic and administrative missions, to preserve official agency records in accordance with applicable statutory and regulatory requirements, and to ensure access to information by Treasury officials, and the public as appropriate.

**Section 4: Information Collection**

**Section 4.1: Relevant and Necessary**

The [Privacy Act](#) requires “each agency that maintains a [system of records](#) [to] maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be fulfilled by statute or by executive order of the President.” 5 U.S.C. § 552a (e)(1). It allows federal agencies to exempt records from certain requirements (including the relevant and necessary requirement) under certain conditions<sup>5</sup> U.S.C. §552a (k).



The proposed exemption must be described in a [Notice of Proposed Rulemaking](#) (“NPRM”). In the context of the Privacy Act, the purpose of the NPRM is to give the public notice of a Privacy Act exemption claimed for a system of records and solicit public opinion on the proposed exemption. After addressing any public concerns raised in response to the NPRM, the agency must issue a [Final Rule](#). It is possible for some, but not all, of the [records](#) maintained in the system or by the project to be exempted from the [Privacy Act](#) through the [NPRM/Final Rule](#) process.

**[Section 4.1\(a\)](#)** Please check all of the following that are true:

1.  None of the [PII](#) maintained in the system or by the project is part of a [Privacy Act system of records](#);
2.  All of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and none of it is exempt from the [Privacy Act](#) relevant and necessary requirement;
3.  All of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and all of it is exempt from the [Privacy Act](#) relevant and necessary requirement;
4.  Some, but not all, of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and the records to which the [Privacy Act](#) applies are exempt from the relevant and necessary requirement; and  
 Some, but not all, of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and none of the records to which the [Privacy Act](#) applies are exempt from the relevant and necessary requirement.

**[Section 4.1\(b\)](#)**  Yes  No  N/A With respect to [PII](#) maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirement, was an assessment conducted prior to collection (e.g., during [Paperwork Reduction Act](#) analysis) to determine which [PII](#) types (see [Section 4.2](#) below) were relevant and necessary to meet the system's or project's mission requirements?

**[Section 4.1\(c\)](#)**  Yes  No  N/A With respect to [PII](#) currently maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirement, is the [PII](#) limited to only that which is relevant and necessary to meet the system's or project's mission requirements?

**[Section 4.1\(d\)](#)**  Yes  No With respect to [PII](#) maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirements, is there a process to continuously reevaluate and ensure that the [PII](#) remains relevant and necessary?

*All data elements pertaining to human resources information are detailed within the HRConnect and PIV Data Synchronization (PDS) Data Model data dictionary and documented pursuant to the requirements imposed by Office of Management and Budget (OMB) Circular A-130. Additionally, all of the data elements are part of the functional requirements documentation and the configuration management procedures being adhered to by Treasury. Functional requirements documentation consists of data elements, valid values, business rules, workflow, and interfaces that define a given set of functionality within the system. Configuration management procedures are a set of processes, templates, guidelines, and frameworks used to create a snapshot of what the application configuration and code looks like at a given point in time and to plan what the application configuration and code will look like at a defined point in the future (i.e., release).*

*HRConnect also collects information using the forms listed in the table below (Section 4.2) which are subject to the Paperwork Reduction Act. Forms that are subject to the Paperwork Reduction Act (PRA) must be approved by the OMB Director before they are used to collect information from the public. The OMB Director is required by law to determine whether a proposed collection of information by the agency is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility to the agency. If the OMB Director determines that the collection of information (or a portion of the information proposed for collection) by an agency is unnecessary for any reason, the agency may not collect that information. All information that is collected in HRConnect using forms subject to the PRA have been approved by the*

*OMB Director and Treasury processes and, therefore, been assessed and determined to be relevant and necessary.*

*The HRConnect system permits the individual to update their data throughout their employment to keep it current.*

**Section 4.2: PII and/or information types or groupings**

To perform their various missions, federal agencies must necessarily collect various types of information. The checked boxes below represent the types of information maintained in the system or by the project. Information identified below is used by the system or project to fulfill the purpose stated in [Section 3.2 – Authority to Collect](#).

<b>Biographical/General Information</b>		
<input checked="" type="checkbox"/> Name	<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Group/Organization Membership
<input checked="" type="checkbox"/> Date of Birth	<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Military / Selective Service
<input checked="" type="checkbox"/> Home Physical/Postal Mailing Address	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Personal Home Phone or FaxNumber
<input checked="" type="checkbox"/> Zip Code	<input checked="" type="checkbox"/> Personal Cell Number	<input checked="" type="checkbox"/> Alias (including nickname)
<input checked="" type="checkbox"/> Business Physical/Postal Mailing Address	<input checked="" type="checkbox"/> Business Cell Number	<input checked="" type="checkbox"/> Business Phone or Fax Number
<input checked="" type="checkbox"/> Personal e-mail address	<input checked="" type="checkbox"/> Nationality	<input type="checkbox"/> Mother’s Maiden Name
<input checked="" type="checkbox"/> Business e-mail address	<input checked="" type="checkbox"/> Country of Birth	<input checked="" type="checkbox"/> Spouse Information
<input checked="" type="checkbox"/> <input type="checkbox"/> Personal Financial Information (including loan information)	<input checked="" type="checkbox"/> City or County of Birth	<input checked="" type="checkbox"/> Children Information
<input type="checkbox"/> Business Financial Information (including loan information)	<input type="checkbox"/> Immigration Status	<input checked="" type="checkbox"/> Information about other relatives
<input checked="" type="checkbox"/> Marital Status	<input checked="" type="checkbox"/> Citizenship	<input type="checkbox"/> Professional/personal references or other information about an individual’s friends, associates or acquaintances.
<input checked="" type="checkbox"/> Religion/Religious Preference	<input type="checkbox"/> Device settings or preferences (e.g., security level, sharing options, ringtones).	<input type="checkbox"/> Global Positioning System (GPS)/Location Data
<input type="checkbox"/> Sexual Orientation	<input checked="" type="checkbox"/> User names, avatars etc.	<input type="checkbox"/> Secure Digital (SD) Card or Other Data stored on a card or other technology
<input type="checkbox"/> Cell tower records (e.g., logs, user location, time etc.)	<input type="checkbox"/> Network communications data	<input checked="" type="checkbox"/> Cubical or office number
<input checked="" type="checkbox"/> Contact lists and directories (known to contain personal information)	<input type="checkbox"/> Contact lists and directories (not known to contain personal information, but uncertain)	<input checked="" type="checkbox"/> Contact lists and directories (known to contain only business information)
<input checked="" type="checkbox"/> Education Information	<input type="checkbox"/> Resume or curriculum vitae	<input checked="" type="checkbox"/> Other (please describe): <u>Years of service at the agency</u>
<input checked="" type="checkbox"/> Other (please describe): <u>Employment type (full or part-time).</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Eligibility for and coverage under Federal Employees Group Life Insurance Program.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Eligibility for and coverage under Federal Employee Retirement System (FERS) coverage.</u>
<input checked="" type="checkbox"/> Other (please describe): <u>Occupational series.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Official Title Code.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Pay band.</u>



<input checked="" type="checkbox"/> Other (please describe): <u>Whether the employee's position is temporary or permanent.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Employment type.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Sensitivity Code; Level of risk associated with the position.</u>
<input checked="" type="checkbox"/> Other (Please describe): <u>Official title associated with the position.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Position Target Grade.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Retirement/social security coverage held by the employee.</u>
	<input checked="" type="checkbox"/> Other (please describe): <u>Work schedule type.</u>	<input checked="" type="checkbox"/> Other (please describe): <u>Instant Message ID (IM) (table is under personal data CWR), Language proficiency (languages spoken).</u>

Identifying Numbers	
<input checked="" type="checkbox"/> Full Social Security number	<input type="checkbox"/> Health Plan Beneficiary Number
<input checked="" type="checkbox"/> Truncated/Partial Social Security number (e.g., last 4 digits)	<input type="checkbox"/> Alien Registration Number
<input checked="" type="checkbox"/> Personal Taxpayer Identification Number (same as SSN)	<input type="checkbox"/> Business Taxpayer Identification Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input type="checkbox"/> Personal Credit Card Number	<input type="checkbox"/> Business Credit Card Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input type="checkbox"/> Personal Vehicle Identification Number	<input type="checkbox"/> Business Vehicle Identification Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input type="checkbox"/> Personal License Plate Number	<input type="checkbox"/> Business License Plate Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input type="checkbox"/> File/Case ID Number (individual)	<input type="checkbox"/> File/Case ID Number (business) (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input checked="" type="checkbox"/> Personal Professional License Number	<input type="checkbox"/> Business Professional License Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
<input checked="" type="checkbox"/> Employee Identification Number	<input type="checkbox"/> Patient ID Number
<input type="checkbox"/> Business Bank Account Number	<input checked="" type="checkbox"/> Personal Bank Account Number
<input type="checkbox"/> Commercially obtained internet navigation/purchasing habits of individuals	<input type="checkbox"/> Government obtained internet navigation/purchasing habits of individuals
<input type="checkbox"/> Business License Plate Number (non-sole- proprietor)	<input type="checkbox"/> Driver's License Number
<input checked="" type="checkbox"/> Personal device identifiers or serial numbers	<input checked="" type="checkbox"/> Other Identifying Numbers (please describe): <u>Number randomly assigned to personnel files and maintained by Office of Human Resources (OHR) and provided to external vendors and internally within Treasury as a unique identifier to allow the development of aggregate/ statistical data to measure internal performance of Treasury programs. These numbers are deleted at the end of each project/study. New numbers are randomly created for each study.</u>

Medical/Emergency Information Regarding Individuals	
<input type="checkbox"/> Medical/Health Information	<input type="checkbox"/> Worker's Compensation Act Information
<input type="checkbox"/> Mental Health Information	<input checked="" type="checkbox"/> Disability Information
<input type="checkbox"/> Patient ID Number	
<input type="checkbox"/> Other (please describe): _____	<input checked="" type="checkbox"/> Emergency Contact Information (e.g., a third party to contact in case of emergency)

**Biometrics/Distinguishing Features/Characteristics of Individuals**

<input checked="" type="checkbox"/> Physical description/ characteristics (e.g., hair, eye color, weight, height, sex, gender etc.); <u>Sex</u>	<input type="checkbox"/> Signatures	<input type="checkbox"/> Vascular scans
<input type="checkbox"/> Fingerprints	<input type="checkbox"/> Photos	<input type="checkbox"/> Retina/Iris Scans
<input type="checkbox"/> Palm prints	<input type="checkbox"/> Video	<input type="checkbox"/> Dental Profile
<input type="checkbox"/> Voice audio recording	<input type="checkbox"/> Scars, marks, tattoos	<input type="checkbox"/> DNA Sample or Profile
<input type="checkbox"/> Other (please describe): _____	<input type="checkbox"/> Other (please describe): _____	<input type="checkbox"/> Other (please describe): _____

**Audit Log and Security Monitoring Information**

<input checked="" type="checkbox"/> User ID assigned to or generated by a user of Treasury IT:
<input checked="" type="checkbox"/> Passwords generated by or assigned to a user of Treasury IT
<input checked="" type="checkbox"/> Date and time an individual accesses a facility, system, or other IT; <u>HRC system</u>
<input type="checkbox"/> Internet or other queries run by a user of Treasury IT
<input type="checkbox"/> Video of individuals derived from security cameras

Applicants who receive and accept job offers for employment with a Federal agency that is serviced by HRC submit the information in Section 4.2 into the Treasury EBS HRLob EODS (Entrance On Duty System) using the forms listed in the chart below. These forms are required to complete the hiring/onboarding process. For those agencies that use the Entrance on Duty System (EODS), these forms are completed within EODS and some of the information in these forms (not the form itself) is sent to HRC via a secure interface.

<b>Form</b>	<b>EODS</b>	<b>HRC</b>
AD-349 USDA Employee Address	Yes	Yes
I-9 Employment Eligibility Verification Data	Yes	No **
OF-306 Declaration of Federal Employment	Yes	No **
PIV Applicant Information	Yes	No **
SF-1199A Direct Deposit / Allotments	Yes	Yes
TSP-19 Transfer	Yes	No
W4 Federal Withholding	Yes	Yes
All State Taxes	Yes	Yes
D4 D.C. Tax Withholding	Yes	Yes
D4A D.C. Tax Waiver	Yes	Yes
MW507 Maryland Tax Withholding	Yes	Yes
V4 Virginia Tax Withholding	Yes	Yes
SF-144 Statement of Prior Federal Service	Yes	No
SF-181 Ethnicity and Race Identification	Yes	Yes
SF-256 Self Identification of Disability	Yes	Yes
SF-61 Appointment Affidavit /Oath of Office	Yes	No
SF-2809 Federal Employment Health Benefits (FEHB) Election	Yes	Yes
DG 60 FEHB Premium Conversion Waiver	Yes	Yes
SF-2817 Federal Employee Group Life Insurance (FEGLI) Life Insurance Election	Yes	Yes
SF-2823 FEGLI Designation of Beneficiary	Yes	No
SF-3109 Federal Employee Retire System (FERS) Election of Coverage	Yes	Yes
FS-2808 Designation of Beneficiary – Civil Service Retirement System (CSRS)	Yes	No
SF3102 Designation of Beneficiary - Federal Employee Retire System (FERS)	Yes	No
OGE-278e Executive Branch Personnel Public Financial Disclosure Report	Yes	No
OGE-450 Confidential Financial Disclosure	Yes	No
SF-1152 Designation of Beneficiary Unpaid Compensation	Yes	No
TSP1 Thrift Savings Plan Election	Yes	Yes
TSP3 Thrift Savings Plan Designation of Beneficiary	Yes	No
TSP1-C Thrift Savings Plan Catch Up	Yes	Yes
24-Hr Personal Accident Insurance Enrollment	Yes	Yes (OCC Only)
OCC Group Life Insurance Enrollment	Yes	Yes (OCC Only)
OCC Short Term Disability Enrollment	Yes	Yes (OCC Only)
DS5002 State Department Designation of Beneficiary	Yes	No
SF52 Request for Personnel Action	No	Yes
SF50 Notification of Personnel Action	No	Yes
OF-8 Position Description	No	Yes

These forms require individuals to submit personally identifiable information (PII). The data derived from these forms is entered into HRConnect for purposes of performing activities related to individuals' employment, such as compensation, benefits, and retirement. This includes the following types of information:

- Emergency Contact Data
- Citizenship, Race & Ethnicity Data
- Disability Data
- Banking & Financial Data
- Federal & State Tax Data
- Selective Service and Military Service Data
- Criminal and Debt History Data related to suitability for employment
- Education Data
- Health Benefit Data

\*\*CR 35355 provides new functionality where forms can be associated with attachment types. If the form can be associated with onboard/security attachments; data will not be stored in HRC tables.

*Form ID	Description
1	Application for Access to Main Treasury Complex
10	Memorandum of Understanding/Agreement
11	New Hire Selection Notice
12	Request for Personnel Action (SF-52)
13	Resume
14	Supplemental Documentation for the Application to MTC or Security Processing
15	Position Description and Signed Position Description Form (OF-8)
16	Visit Authorization Request or Letter
17	Visit Access Request (VAR)
2	Certificate of Birth
3	U.S. Citizen Born Aboard
4	U.S. Certificate of Naturalization
5	Permanent Alien Registration Card
6	Contracts and Modifications
7	Contractor Suitability Form (CSF)
8	Declaration of Federal Employment Form (OF-306)
9	Intergovernmental Personnel Act (IPA) Agreement Form

*HRCconnect does not maintain actual Federal forms. Federal agencies that use HRC and EODs only maintain data extracted from the federal/agency forms listed below which are entered into HRC from the EODS data feed. The table below is a complete list of SF forms and all data elements containing PII associated with each form. Document attachments are allowed in HRC.*

Form ID	Form Name	Data Elements
<b>General Onboarding Forms</b>		
<i>Declaration for Federal Employment</i>		
<a href="#">OF-306</a>	<b>Declaration for Federal Employment</b>	<b>All Data Elements in OF-306 pertain to the Applicant</b>
Applicant Full name (if only have initials in name provide and indicate "initials only"; if no middle name indicate "No Middle Name")	Phone Number	Selective Service Registration
Social Security number	Date of birth	Branch of Service
Place of Birth	Other Names used	Dates of Military Service
Citizenship	Military Service	Type of Discharge
Other Names used		
<i>Appointment Affidavit</i>		
<a href="#">SF-61</a>	<b>Appointment Affidavit</b>	<b>All Data Elements in SF-61 pertain to the Applicant</b>
Applicant Name	Notary Public Commission Seal information	
<i>Statement of Prior Federal Service</i>		
<a href="#">SF-144</a>	<b>Statement of Prior Federal Service</b>	<b>All Data Elements in SF-144 pertain to the Applicant</b>
Applicant Name Last, First, Middle	Date of Birth	Year, month and day of service
Social Security Number	Branch of Uniformed service	Type of Discharge
<i>Ethnicity and Race Identification</i>		
<a href="#">SF-181</a>	<b>Ethnicity and Race Identification</b>	<b>All Data Elements in SF-181 pertain to the Applicant</b>
Applicant Name	Social Security Number	Date of Birth

Form ID	Form Name	Data Elements
Ethnicity/Race		
<b>Self-Identification of Disability</b>		
<a href="#">SF-256</a>	<b>Self-Identification of Disability</b>	<b>All Data Elements in SF-256 pertain to the Applicant</b>
Applicant Last Name, First Name, and Middle initial	Date of Birth	Social Security Number
<b>Direct Deposit Sign-up</b>		
<a href="#">SF-1199A</a>	<b>Direct Deposit Sign-Up</b>	<b>Data Elements in SF-1199A pertain to the Applicant and Joint Payee and Join Account holder information</b>
Applicant Name of Payee Last, First, Middle Name	Name of person entitled to payment	Depositor account number
Applicant Address	Applicant Claim or Payroll ID number	Joint Account holders Certification required Signature
Applicant Telephone number	Payee/Joint Payee Certification require Signature	Type of Depositor Account Checking or Savings
<b>FERS Election of Coverage</b>		
<a href="#">SF-3109</a>	<b>FERS Election of Coverage</b>	<b>Data Elements in SF-3109 pertain to the Applicant and Former Spouse Information</b>
Applicant Name Last, First Middle	Applicant Social Security Number	Applicant Date of Birth
Applicant Marital Status	Applicant Former Spouse's Full Name if OPM form 1556 is included as an attachment	
<b>Designation of Beneficiary (CSRS)</b>		
<a href="#">SF-2808</a>	<b>Designation of Beneficiary (CSRS)</b>	<b>Data Elements in SF-2808 pertain to Applicant and Designation for beneficiary or beneficiaries</b>
Applicant Name Last, First, Middle	Applicant Retirement Claim Number	Address of each beneficiary
Applicant Date of Birth	Applicant Address	Relationship to applicant
Applicant Social Security Number	Applicants Designation for beneficiary or beneficiaries First name, middle initial, and last name of each beneficiary	
<b>Designation of Beneficiary (FEGLI)</b>		
<a href="#">SF-2823</a>	<b>Designation of Beneficiary (FEGLI)</b>	<b>Data Elements in SF-2823 pertain to the Applicant and Beneficiary for the applicant</b>
Applicant Name, Last, first, middle	Applicant Home address	Beneficiary Social Security Number
Applicant Date of Birth	Applicant Civil Service Annuity (CSA), CSI, or Office of Worker Compensation Program (OWCP) claim number	Applicants Beneficiary Address
Applicant Social Security Number	Beneficiary First name, middle initial, and last name of each beneficiary for the applicant	Beneficiary Relationship to applicant
<b>Designation of Beneficiary (FERS)</b>		
<a href="#">SF-3102</a>	<b>Designation of Beneficiary (FERS)</b>	<b>Data Elements in SF-3102 pertain to the Applicant and Beneficiary</b>
Applicant Name, Last, First, Middle	Applicant Social Security Number	Applicant Home address
Applicant Date of Birth	Applicant If retired claim number	Applicant Beneficiary First name, initial, and last name of each beneficiary
<b>Designation of Beneficiary Unpaid Compensation of Deceased Fed Employee</b>		

<b>Form ID</b>	<b>Form Name</b>	<b>Data Elements</b>
<b><a href="#">SF-1152</a></b>	<b>Designation of Beneficiary Unpaid Compensation of Deceased Fed Employee</b>	<b>Data Elements in SF-1152 pertain to the Applicant and Beneficiary for the applicant</b>
Applicant Name Last, First, Middle	Applicant Address	Address of each Applicants beneficiary
Applicant Date of birth	Applicants Beneficiary First name, middle initial, and last name of each beneficiary	Beneficiary Relationship to Applicant
Applicant Social Security Number		
<b><i>Thrift Savings Plan Designation of Beneficiary</i></b>		
<b><a href="#">TSP-3</a></b>	<b>Thrift Savings Plan Designation of Beneficiary</b>	<b>Data Elements in TSP-3 pertain to the Applicant and Beneficiary</b>
Applicant Name Last, First, Middle	Applicant Foreign address	Applicant Beneficiary Social security Number or Tax ID
Applicant TSP Account Number	Applicant Benefits Information (including optional benefits selected)	Applicant Beneficiary Date of Birth
Applicant Date of Birth	Applicant Relationship to Beneficiary information: Name of Spouse, Trust, Estate, Legal Entity/Corporation	Applicant Beneficiary Foreign address
Applicant Day time Phone number	Applicant Beneficiary Name of Individual Last, first Middle/Legal Entity or corporation	Applicant Beneficiary Home address
Applicant Home address		
Applicant Name Last, First, Middle	Applicant Foreign address	Applicant Beneficiary Social security Number or Tax ID
<b><i>Employee Election Form</i></b>		
<b><a href="#">TSP-1</a></b>	<b>Thrift Savings Plan Enrollment</b>	<b>All Data Elements in TSP-1 pertain to the Applicant</b>
Applicant Name Last, First Middle	Address	Social Security Number
Home Phone Number		
<b><i>TSP Catch-Up Contribution Form</i></b>		
<b><a href="#">TSP-1-C</a></b>	<b>TSP Catch-Up Contribution</b>	<b>All Data Elements in TSP-1-C pertain to the Applicant</b>
Applicant Name Last, First, Middle	Social Security Number	Phone Number
Address		
<b><i>Premium Conversion Waiver/Election</i></b>		
<b><a href="#">DG-60</a></b>	<b>Premium Conversion Waiver/Election Form</b>	<b>All Data Elements in DG-60 pertain to the Applicant</b>
Applicant Last Name, First Name, Middle Initial	Social Security Number	Applicant Last Name, First Name, Middle Initial
<b><i>Life/Health Insurance/Benefits</i></b>		
<b><a href="#">SF-2809</a></b>	<b>Employee Health Benefit Election (FEHB)</b>	<b>Data Elements in SF-2809 pertain to the Applicant and Eligible family member/s</b>
Applicant/Enrollee name last, first, middle initial	Applicant Policy number	Eligible family member/s Gender
Applicant Social Security Number	Applicant Email address	Eligible family member/s Address
Applicant Date of Birth	Applicant Phone number	Eligible family member/s Name of other insurance
Applicant Gender	Eligible family member/s Name Last, First, Middle initial	Eligible family member Name of other insurance and Policy Number
Applicant Marital Status	Eligible family member/s Social Security Number	Eligible family member/s Medicare Claim Number
Applicant Home address	Eligible family member/s Date of Birth	Eligible family member/s Email address
Applicant Name of other insurance and Policy Number		
<b><i>Life Insurance Election (FEGLI)</i></b>		



Form ID	Form Name	Data Elements
<a href="#"><u>SF-2817</u></a>	<b>Life Insurance Election (FEGLI)</b>	<b>All Data Elements in SF-2817 pertain to the Applicant</b>
Name last, first, middle	Social Security Number	Telephone number
Date of birth	Office of Worker's Compensation Programs (OWCP)	
<b><i>Withholding Allowances/Exemption Certificate</i></b>		
<a href="#"><u>W-4</u></a>	<b>Employee Withholding Allowance</b>	<b>All Data Elements in W4 pertain to the Applicant</b>
Name First, Middle initial, Last Name	Home Address	Marital Status
Employee Address		
AD-349	Employee address	All Data Elements in W4 pertain to the Applicant
Name Last, First, Middle	Social Security Number	Employee Home Address
Employee Mailing Address	Signature of Employee	
<b><i>Employment Eligibility Verification</i></b>		
<a href="#"><u>I-9</u></a>	<b>Employment Eligibility Verification</b>	<b>Not All Data Elements in form</b>
Name Last, First, Middle initial	Other Names Used	Home Address
Date of Birth	Social Security Number	Email Address
Telephone Number	Citizenship Status	Signature of Employee
Signature of Preparer or Translator	Name Last and First of Preparer	Address of Preparer
Identifying Document number	Signature of Employer or Authorized Representative	Title of Employer
Employer's business	Business Address	Date of Rehire
<b><i>Personal Identity Verification for Federal Employees and Contractors</i></b>		
<b>Form 13760</b>	<b>Personal Identity Verification for Federal Employees and Contractors</b>	<b>Not All Data Elements in form pertain to the Applicant</b>
Employee status (Employee or Contractor)	Contract Number	Contractor's Company Name
Name Last, First, Middle Initial	Social Security Number	Date of Birth
Home Mailing Address	Signature	Sponsor Name
Sponsor Title	Sponsor Phone Number	Sponsor Signature
ID Number	Registrar Name	Registrar Title
Registrar Phone Number	Registrar Signature	Issuer Name
Issuer Title	Issuer Phone Number	Issuer Signature
<b><i>Certificate of Non-residence in the District of Columbia</i></b>		
<a href="#"><u>Form D-4A</u></a>	<b>Certificate of Non-residence in the District of Columbia</b>	<b>Not All Data Elements in form pertain to the Applicant</b>
Name First, Middle Initial, Last Name	Temporary DC address	Social Security Number
Permanent Address	Signature	
<b><i>Notification of Personnel Action</i></b>		
<a href="#"><u>SF-50</u></a>	<b>Notification of Personnel Action</b>	<b>Not All Data Elements in form pertain to the Applicant</b>
Name Last, First, Middle	Social Security Number	Date of Birth
Position Title and Number	Pay Plan	Occ. Code
Grade or Level	Step or Rate	Total Salary
Pay Basis	Name and Location of Position's Organization	Veterans Preference
Tenure	FEGLI	Service Computation Date
Work Schedule	Position Occupied	FLSA Category
Appropriation Code	Bargaining Unit Status	Duty Station
Employing Department or Agency	Signature and Title of Approving Official	
<b><i>Transfer of Information Between Agencies</i></b>		
<a href="#"><u>TSP-19</u></a>	<b>Thrift Savings Plan</b>	<b>Not All Data Elements in form pertain to the Applicant</b>

<b>Form ID</b>	<b>Form Name</b>	<b>Data Elements</b>
Name Last, First, Middle	Social Security Number	Date of Birth
Date of Transfer	TSP Status Code	TSP Service Compilation Date
TSP Vesting Code	Contribution Election Information	Catch-up contribution information
Loan information	Loan Account Number and Payment Amount	Employee Nonpay status
Agency Name	Name of Contact Person	Telephone Number of Contact Person
Agency Location		
<b><i>Personnel Public Financial Disclosure Report</i></b>		
<b><u>OGE Form 278e</u></b>	<b>Personnel Public Financial Disclosure Report</b>	<b>Not All Data Elements in form pertain to the Applicant</b>
Name Last, First, Middle Initial	Title of Position	Department or Agency
Location of Present Office	Office Telephone Number	Presidential Nomination Congressional Committee
Certifying Individual's Signature	Reviewer's Signature	Ethics Official's Signature
Assets and Income Amounts	Transactions Exceeding \$1,000	Gifts, Reimbursements, and Travel Expenses
Debts over \$10,000	Other Employment Compensation	Employment Held Outside of the U.S. Government
Compensation in Excess of \$5,000 Paid by One Source		
<b><i>Confidential Financial Disclosure Report</i></b>		
<b><u>OGE Form 450</u></b>	<b>Confidential Public Financial Disclosure Report</b>	<b>Not All Data Elements in form pertain to the Applicant</b>
Name Last, First, Middle Initial	Position/Title	Agency
Branch/Unit and Address	Work Number	E-mail address
Special Government Employee (SGE)	SGE Mailing Address	Reporting Status
Certifying Individual's Signature	Reviewer's Signature	Agency's Final Reviewing Official's Signature
Assets and Income Amounts	Transactions Exceeding \$1,000	Gifts, Reimbursements, and Travel Expenses
Debts over \$10,000	Other Employment Compensation	Employment Held Outside of the U.S. Government
<b><i>US Department of State Foreign Service Designation of Beneficiary</i></b>		
<b><u>DS-5002</u></b>	<b>Designation of Beneficiary</b>	<b>Data Elements in DS-5002 pertain to Applicant and Designation for beneficiary or beneficiaries</b>
Applicant Name Last, First, Middle	Applicant Post of Assignment	Address of each beneficiary
Applicant Date of Birth	Applicant Address	Relationship to applicant
Applicant Social Security Number	Applicants Designation for beneficiary or beneficiaries First name, middle initial, and last name of each beneficiary	

### **Section 4.3: Sources of information and the method and manner of collection**

*Applicants who receive and accept job offers for employment with a Federal agency that is serviced by HRC submit information using the forms listed in Section 4.2, which are required to complete the hiring/onboarding process. For those agencies that use the Entrance on Duty System (EODS), these forms are completed within EODS and the necessary information (not all information contained in the forms) is sent to HRConnect via an interface.*

**Section 4.4: Privacy and/or civil liberties risks related to collection**

**Notice of Authority, Principal Uses, Routine Uses, and Effect of not Providing Information**

When Federal agencies use a form to obtain information from an individual that will be maintained in a [system of records](#), they must inform the individual of the following: “(A) the authority (whether granted by statute, or by executive order of the President) which authorizes the solicitation of the information and whether disclosure of such information is mandatory or voluntary; (B) the principal purpose or purposes for which the information is intended to be used; (C) the routine uses which may be made of the information as published pursuant to paragraph (4)(D) of this subsection; and (D) the effects on her/him, if any, of not providing all or any part of the requested information.” 5 U.S.C § 522a(e)(3).

<p><a href="#">Section 4.4(a)</a> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Is any of the <a href="#">PII</a> maintained in the system or by the project collected directly from an individual?</p> <p><a href="#">Section 4.4(b)</a> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Was the information collected from the individual using a form (paper or electronic)?</p> <p><a href="#">Section 4.4(c)</a> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If the answer to Section 4.4(b) was “yes,” was the individual notified (on the form in which the <a href="#">PII</a> was collected or on a separate form that can be retained by the individual) about the following at the point where the information was collected (e.g., in a form; on a website).</p> <p><input checked="" type="checkbox"/> The authority (whether granted by statute, or by Executive order of the President) which authorizes the solicitation of the information.</p> <p><input checked="" type="checkbox"/> Whether disclosure of such information is mandatory or voluntary.</p> <p><input checked="" type="checkbox"/> The principal purpose or purposes for which the information is intended to be used.</p> <p><input checked="" type="checkbox"/> The individuals or organizations outside of Treasury with whom the information may be/ will be shared.</p> <p><input checked="" type="checkbox"/> The effects on the individual, if any, if they decide not to provide all or any part of the requested information.</p>
<p><i>The authority, principal purpose(s), and routine uses of information collected have been communicated to the provider in the form or on the website at the point of collection.</i></p>

**Use of Social Security Numbers**

Social Security numbers (“SSN”) are commonly used by identity thieves to commit fraudulent acts against individuals. The SSN is one data element that has the ability to harm the individual and requires more protection when used. Therefore, in an effort to reduce risk to individuals and federal agencies, OMB Memorandum M-07-16, Safeguarding Against and Responding to the Breach of Personally Identifiable Information, (May 22, 2007) required agencies to reduce the use of SSNs in agency systems and programs and to identify instances in which the collection is superfluous. In addition, OMB mandated agencies to explore alternatives to agency use of SSNs as personal identifiers for Federal employees and members of the public.

In addition, the [Privacy Act](#) provides that: “It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual’s refusal to disclose his social security account number.” Pub. L. No. 93–579, § 7. This provision does not apply to: (1) any disclosure which is required by

federal statute; or (2) any disclosure of an SSN to any federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, if such disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. *Id.* at § 7(a)(2)(A)-(B).

**Section 4.4(d)** Yes No N/A Does the system or project maintain SSNs?

**Section 4.4(e)** Yes No N/A Are there any alternatives to the SSNs as a personal identifier? If yes, please provide a narrative explaining why other alternatives to identify individuals will not be used.

**Section 4.4(f)** Yes No N/A Will individuals be denied any right, benefit, or privilege provided by law because of such individual's refusal to disclose their SSN? If yes, please check the applicable box:

- SSN disclosure is required by Federal statute or Executive Order. ; or
- the SSN is disclosed to any Federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, and disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. *If checked, please provide the name of the system of records in the space provided below.*

**Section 4.4 (g)** Yes No N/A When the SSN is collected, are individuals given notice whether disclosure is mandatory or voluntary, the legal authority such number is solicited, and what uses will be made of it? If yes, please explain what means are used to provide notice.

*The SSN is required by HRConnect's payroll provider, the United States Department of Agriculture, National Finance Center (NFC). NFC has operated as a payroll system of records since 1973.*

## First Amendment Activities

The [Privacy Act](#) provides that Federal agencies “maintain no record describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual about whom the record is maintained or unless pertinent to and within the scope of an authorized law enforcement activity.” 5 U.S.C. § 552a(e)(7).

**Section 4.4(h)** Yes No Does the system or project maintain any information describing how an individual exercises their rights guaranteed by the First Amendment?

**Section 4.4(h)** If the system or project maintains information describing how an individual exercises their rights guaranteed by the First Amendment, do any of the following exceptions apply (the information may be maintained if any of the exceptions apply)?

N/A (system or project does not maintain any information describing how an individual exercises their rights guaranteed by the First Amendment so no exceptions are needed)

- The individual about whom the information was collected or maintained expressly authorizes its collection/maintenance.
- The information maintained is pertinent to and within the scope of an authorized law enforcement activity.
- There is a statute that expressly authorizes its collection.

*HRConnect does not collect information about first amendment activities.*

## **Section 5: Maintenance, use, and sharing of the information**

The following sections require a clear description of the system's or project's use of information.

### **Section 5.1: Describe how and why the system or project uses the information it collects and maintains**

Please describe all of the uses of the information types and groupings collected and maintained by the system or project (see [Section 4.2](#)), including a discussion of why the information is used for this purpose and how it relates to the mission of the bureau or office that owns the system.

*The information collected and maintained in the system is used by Treasury and other federal agencies to:*

- (1) record deductions, leave accrued and taken ; maintain and display Leave and Earnings statements; commence and terminate allotments; answer inquiries; and process claims;*
- (2) maintain current and historical personnel records and prepare individual administrative transactions relating to education and training; job assignment; career development; evaluation; promotion, compensation, separation and retirement;*
- (3) provide data for the production of reports, statistical surveys, rosters, documentation, and studies required for orderly personnel administration within Treasury and its components;*
- (4) maintain and administer organizational setup, such as organizational hierarchy; reporting hierarchy; job codes and classification; pay plans and associated salary (including locality pay); work locations; and position budget management;*
- (5) perform personnel functions for Federal agencies for which Treasury is a cross-services provider and provide information necessary to enable the payroll provider, National Finance Center (NFC), to perform the activities necessary to calculate and distribute pay.*

*[PII](#) is used to identify employees for the purpose of carrying out the system objectives, as described above. Other uses are discussed in Section 5.4, Information sharing with external agencies.*

### **Collecting Information Directly from the Individual When Using it to Make Adverse Determinations About Them**

The [Privacy Act](#) requires that Federal agencies “collect information to the greatest extent practicable directly from the subject individual when the information may result in adverse determinations about an individual’s rights, benefits, and privileges under Federal programs.” 5 U.S.C. § 552a(e)(2).

**[Section 5.1\(a\)](#)**  Yes  No Is it possible that the information maintained in the system or by the project may be used by Treasury to make an adverse determination about an individual’s rights, benefits, and privileges under federal programs (e.g., decisions about whether the individual will receive a financial benefit, get a clearance or access to a Treasury facility, obtain employment with Treasury)?

**[Section 5.1\(b\)](#)**  Yes  No Is it possible that Treasury will share information maintained in the system or by the project with a third party external to the Department that will use the information to make an adverse determination about an individual’s rights, benefits, and privileges under federal programs?

**[Section 5.1\(c\)](#)**  Yes  No  N/A If information could potentially be used to make an adverse determination about an individual’s rights, benefits, and privileges under federal programs, does the system or project collect information (to the greatest extent practicable) directly from the individual?

The vast majority of information maintained in the system is collected directly from the employee. Such information could be used to make an adverse determination about an individual's rights, benefits, and privileges under federal programs. Agencies with which HRConnect shares information pursuant to the routine uses in the applicable systems of records notices (see below) may also use information from the system during their performance evaluation processes.

Information maintained in the system regarding employee performance may be based on input from both the employee and their manager. Performance information may be used to make an adverse determination about an individual's ability to receive a performance award. For an employee to receive a performance award, they must have received an overall rating of at least fully successful on their performance evaluation. This is enforced by the payroll provider system, NFC. The overall rating is not determined by HRConnect; it is determined (offline) by the manager and reviewing manager during the performance evaluation process. During the performance evaluation process, employees are provided with an opportunity to articulate their performance achievements and may submit an official written statement on their performance evaluation. HRConnect maintains the overall rating and the performance award amount and electronically transmits both to the payroll provider, NFC. Determinations regarding performance awards, including the amount of individual awards, are made by supervisors and senior staff within each bureau or office, not by the Office of Human Resources (OHR).

## Data Mining

As required by Section 804 of the [Implementing the 9/11 Commission Recommendations Act of 2007](#) ("9-11 Commission Act"), Treasury reports annually to Congress on its data mining activities. For a comprehensive overview of Treasury's data mining activities, please review the Department's Annual Privacy reports available at: <http://www.treasury.gov/privacy/annual-reports>.

**Section 5.1(d)**  Yes  No Is information maintained in the system or by the project used to conduct "data-mining" activities as that term is defined in the [Implementing the 9-11 Commission Act](#)?

*No privacy and civil liberties risks were identified because HRConnect is not used to conduct data-mining.*

## [Section 5.2: Ensuring accuracy, completeness, and timeliness of information collected, maintained, and shared](#)

### Exemption from Accuracy, Relevance, Timeliness, and Completeness Requirements

The [Privacy Act](#) requires that Federal agencies "maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination." 5 U.S.C § 552a(e)(5). If a particular [system of records](#) meets certain requirements (including the [NPRM](#) process defined in Section 2 above), an agency may exempt the [system of records](#) (or a portion of the records) from this requirement.

**Section 5.2(a)**  Yes  No Is all or any portion of the information maintained in the system or by the project: (a) part of a [system of records](#) and (b) exempt from the accuracy, relevance, timeliness, and completeness requirements in sections (e)(5) of the [Privacy Act](#)?

*All of the information maintained in the system is both part of a system of records and is not exempt from the accuracy, relevance, timeliness, and completeness requirements of the Privacy Act.*



## Matching

The Computer Matching and Privacy Protection Act of 1988 amended the [Privacy Act](#) imposing additional requirements when [Privacy Act systems of records](#) are used in computer matching programs.

Pursuant to the [Privacy Act](#), as amended, there are two distinct types of matching programs. The first type of matching program involves the computerized comparison of two or more automated federal personnel or payroll [systems of records](#) or a system of federal personnel or payroll records with non-federal records. This type of matching program may be conducted for any purpose. The second type of matching program involves the computerized comparison of two or more automated [systems of records](#) or a [system of records](#) with non-federal records. The purpose of this type of matching program must be for the purpose of eligibility determinations or compliance requirements for applicants, recipients, beneficiaries, participants, or providers of services for payments or in-kind assistance under federal benefit programs, or recouping payments or delinquent debts under such federal benefit programs. *See* 5 U.S.C. § 522a(a)(8).

Matching programs must be conducted pursuant to a matching agreement between the source and recipient agencies. The matching agreement describes the purpose and procedures of the matching **and** establishes protections for matching records.

**Section 5.2(b)**  Yes  No Is any of the information maintained in the system or by the project (a) part of a [system of records](#) and (b) used as part of a matching program?

**Section 5.2(c)**  Yes  No  N/A Is there a matching agreement in place that contains the information required by Section (o) of the [Privacy Act](#)?

**Section 5.2(d)**  Yes  No  N/A Are assessments made regarding the accuracy of the records that will be used in the matching program?

**Section 5.2(e)**  Yes  No  N/A Does the bureau or office that owns the system or project independently verify the information, provide the individual notice and an opportunity to contest the findings, or obtain Data Integrity Board approval in accordance with Section (p) of the [Privacy Act](#) before taking adverse action against the individual?

*None of the records in the system are used as part of a matching program. Therefore, no privacy or civil liberties issues were identified in response to this question.*

## Ensuring Fairness in Making Adverse Determinations About Individuals

Federal agencies are required to “maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.” 5 U.S.C. § 552a(e)(5). This requirement also applies when merging records from two or more sources where the merged records are used by the agency to make any determination about any individual.

**Section 5.2(f)**  Yes  No With respect to the information maintained in the system or by the project, are steps taken to ensure all information used to make a determination about an individual is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination?

*The data collected is verified for accuracy, relevancy, and completeness by the employees who submit their information to Treasury and other federal agencies that use HRConnect (and in some*

*cases EODs). The information is also reviewed by participating agencies' HR Specialists and undergoes the quality assurance process put in place by each agency. Treasury employees may also update their information in HRConnect upon request at any time.*

## Merging Information About Individuals

[Section 5.2\(g\)](#) Yes No Is information maintained in the system or by the project merged with electronic or non-electronic information from internal or external sources (e.g., other files or systems)?

[Section 5.2\(h\)](#) Yes No N/A Once merged, is the information used in making determinations about individuals (e.g., decisions about whether the individual will receive a financial benefit or payment, get a clearance or access to a Treasury facility, obtain employment with Treasury, etc.

[Section 5.2\(i\)](#) Yes No N/A Are there documented policies or procedures for how information is merged?

[Section 5.2\(j\)](#) Yes No N/A Do the documented policies or procedures address how to proceed when partial matches (where some, but not all of the information being merged matches a particular individual) are discovered after the information is merged?

[Section 5.2\(k\)](#) Yes No N/A If information maintained in the system or by the project is used to make a determination about an individual, are steps taken to ensure the accuracy, relevance, timeliness, and completeness of the information as is reasonably necessary to assure fairness to the individual?

*Information sent to HRConnect pertaining to individuals must include a unique identifier in a format recognized by HRConnect. This unique identifier is used to merge information. If the unique identifier is not in HRConnect or if there is only a partial match between the unique identifier and other identifying information and the nature of the action code does not support this partial match, then the information associated with that unique identifier is sent to an error file, which is subsequently returned to the sender for resolution.*

## Policies and Standard Operating Procedures or Technical Solutions Designed to Ensure Information Accuracy, Completeness, and Timeliness

[Section 5.2\(l\)](#) Yes No N/A If information maintained in the system or by the project is used to make any determination about an individual (even if it is an exempt [system of records](#)), are there documented policies or standard operating procedures for the system or project that address the accuracy, completeness, and timeliness of the information?:

[Section 5.2\(m\)](#) Yes No Does the system or project use any software or other technical solutions designed to improve the accuracy, completeness, and timeliness of the information used to make an adverse determination about an individual's rights, benefits, and/or privileges (regardless of if it is an exempt [system of records](#))?

*The system's paperless personnel actions electronically route actions for approval, greatly reducing processing time and the human error associated with manual processing.*

## Accuracy, Completeness, and Timeliness of Information Received from the Source

[Section 5.2\(n\)](#) Yes No Did Treasury or the bureau receive any guarantee, assurance, or other information from any information source(s) regarding the accuracy, timeliness and completeness of the information maintained

in the system or by the project?

*Each agency/customer that uses HRConnect is responsible for the integrity/quality of the data entered into the system, including accuracy, completeness, and timeliness of the information. The information in the system is also derived directly from the individual, thereby generally providing a higher assurance of its accuracy. Treasury and the agency/customers that use HRConnect do not, however, receive any guarantees about the quality of the information. If errors are discovered, they are corrected.*

### Disseminating Notice of Corrections of or Amendments to PII

**Section 5.2(o)**  Yes  No  N/A Where feasible and appropriate, is there a process in place for disseminating corrections of or amendments to the [PII](#) maintained in the system or by the project to all internal and external information-sharing partners?

**Section 5.2(p)**  Yes  No  N/A Where feasible and appropriate, does the process for disseminating corrections or amendments include notifying the individual whose information is corrected or amended?

*Corrections and amendments made to the record of a Federal employee are done via HR transactions in accordance with the U.S. Office of Personnel Management's Guide to Processing Personnel Actions (GPPA). Individuals are notified via the Standard Form 50 (SF-50), Notification of Personnel Action. For agencies that elect to maintain limited contractor PII in HRConnect, functionality can be enabled for contractors to update/correct their own information directly in HRConnect.*

### Section 5.3: Information sharing within the Department of the Treasury

#### Internal Information Sharing

**Section 5.3(a)**  Yes  No  N/A Is [PII](#) maintained in the system or by the project shared with other Treasury bureaus?

**Section 5.3(b)**  Yes  No  N/A Does the Treasury bureau or office that receives the [PII](#) limit access to those Treasury officers and employees who have a need for the [PII](#) in the performance of their official duties (i.e., those who have a "need to know")?

*Data in the system can only be accessed by the HRC customer agency's employees and managers, the customer's servicing human resources agency (if they have one) as well as HRConnect staff who administer the system databases, code, functionality, and customer support. Each individual's access is based on the permissions in their system profile. HRC customer agencies and support organizations within the Department of the Treasury include:*

**Bureau.** A unit of the Department of the Treasury. The bureaus of the Department of the Treasury are:

- Departmental Offices:
  1. The Office of Inspector General (OIG)
  2. Treasury Inspector General for Tax Administration (TIGTA).
  3. Community Development Financial Institutions Fund (CDFI).
  4. Federal Financing Bank (FFB).
  5. Treasury Forfeiture Fund.
  6. Treasury Franchise Fund.
  7. Internal Revenue Service
  8. Office of Inspector General
  9. U.S. Mint
  10. Financial Crimes Enforcement Network
  11. Bureau of Engraving and Printing
  12. Office of Comptroller of the Currency
  13. Bureau of the Fiscal Service
  14. Special Inspector General for TARP
  15. Treasury Inspector General for Tax Administration

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**Memorandum of Understanding or Other Agreement Limiting Treasury’s Use of the Information**

**Section 5.3(c)**  Yes  No  N/A Is any of the **PII** maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency that provided the information to the Treasury or subject to an international agreement or treaty) that limits or places conditions on Treasury’s internal use, maintenance, handling, or disclosure of the **PII**?

*Treasury has an MOU with the United States Department of Agriculture, National Finance Center (NFC), which governs the responsibilities of both parties.*

**Section 5.4: Information sharing with external (i.e., outside Treasury) organizations and individuals**

**External Information Sharing**

**Section 5.4(a)**  Yes  No Is **PII** maintained in the system or by the project shared with agencies, organizations, or individuals external to Treasury?

*Internal and External HRC customers access their own information directly in HRConnect. When an HRC customer accesses their own information it is not, technically internal sharing; it is merely a use of their own information. HRC customers do, however, sometimes make their own arrangements with vendors outside their organization to share HRC data for the purpose of conducting organizational, workforce, and similar assessments and studies. In general, data is used to develop aggregate/statistical data to measure internal performance of programs and operations. OHR provides customer service with respect to these disclosures upon request, and in accordance with the specific needs of each disclosure. For example, OHR assigns and maintains randomly assigned unique identifiers to each personnel file that is shared internally or externally to allow the development of aggregate/statistical data. These numbers are deleted at the end of each project/study. New unique identifying numbers for personnel files are randomly created for each study.*

- Department of Veterans Affairs Office of Inspector General Department of Agriculture
- USDA Ofc Chief Info Ofcr – CTS (Client Technology Services)
- U. S. Agency for International Development (USAID)
- Architectural and Transportation Barriers Compliance Board (US Access Board)
- Department of Commerce:
  - Office of the Secretary
  - Economic Development Administration
  - Bureau of Economic Analysis
  - National Oceanic and Atmospheric Administration
  - International Trade Administration
  - U. S. Patent and Trademark Office
  - National Institute of Standards and Technology
  - Minority Business Development Agency
  - National Telecommunications and Information Administration
  - National Technical Information Service
  - Bureau of the Census

- *Office of the Inspector General*
- *Office of Inspector General*
- *Economics and Statistics Administration*
- *Bureau of Industry and Security*
- *Department of Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives*
- *Department of Labor*
- *Denali Commission*
- *Federal Reserve Bureau of Consumer Financial Protection (BCFP)*
- *Gulf Coast Ecosystem Restoration Council (GCERC)*
- *Office of Government Ethics (OGE)*
- *Federal Housing Finance Agency OIG (FHFA OIG)*
- *Department of Homeland Security U.S. Secret Service (USSS)*
- *Department of Housing and Urban Development (HUD)*
- *Department of Housing and Urban Development HUD Office Inspector General*
- *Government Accountability Office (GAO)*
- *United States Congress Commission on Security and Cooperation in Europe (CSCE)*
- *Armed Services Retirement Home (AFRH)*
- *Federal Mine Safety and Health Fed Mine Safety Health Rev Com*
- *Commission on People's Republic of China (CECPRC)*
- *Veterans Affairs Office of Inspector General (VA OIG)*

### Accounting of Disclosures

**Section 5.4(b)**  Yes  No  N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), do you maintain a paper or electronic log or other record of the date, nature, and purpose of each disclosure (not including intra-agency disclosures and FOIA disclosures) of a record to any person or to another agency (outside of Treasury) and the name and address of the person or agency to whom the disclosure is made? *See* 5 U.S.C § 552a(c).

**Section 5.4(c)**  Yes  No  N/A If you do not keep a running tabulation of every disclosure at the time it is made, are you able to reconstruct an accurate and complete accounting of disclosures so as to be able to respond to [Privacy Act](#) requests in a timely fashion?

**Section 5.4(d)**  Yes  No  N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), do you retain the log or other record of the date, nature, and purpose of each disclosure, for at least five years or the life of the record, whichever is longer, after the disclosure for which the accounting is made?

**Section 5.4(e)**  Yes  No  N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), does your bureau or office exempt the [system of records](#) (as allowed by the [Privacy Act](#) in certain circumstances) from the requirement to make the accounting available to the individual named in the record?

**Section 5.4(f)**  Yes  No  N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), does your bureau or office exempt the [system of records](#) (as allowed by the [Privacy Act](#) in certain circumstances) from the requirement to inform any person or other agency about any correction or notation of dispute made by the agency of any record that has been disclosed to the person or agency if an accounting of the disclosure was made?

### Statutory or Regulatory Restrictions on Disclosure

**Section 5.4(g)**  Yes  No In addition to the [Privacy Act](#), are there any other statutory or regulatory restrictions on the sharing of any of the PII maintained in the system or by the project (e.g., 26 U.S.C § 6103 for tax returns and return information)?

### Memorandum of Understanding or Other Agreement Related to External Sharing

**Section 5.4(h)**  Yes  No  N/A Has Treasury (including bureaus and offices) executed a Memorandum of Understanding, or entered into any other type of agreement, with any external agencies, organizations, or individuals with which/whom it shares [PII](#) maintained in the system or by the project?

*Treasury is a cross-services provider to the other Federal agencies listed in Section 5.4(a) pursuant to the U.S. Office of Personnel Management Human Resources Line of Business (HRLOB). An Interconnection Security Agreement (ISA) is countersigned by the Servicing Agency (Treasury) and the Requesting Agency (customer). The ISA documents the limitations, conditions, and proper usage of the application and the data within HRC. As the Servicing Agency, Treasury provides data to the third-party application administrators listed in Section 5.4(a). There are also agreements signed between Treasury and these third-party application administrators.*

#### **Memorandum of Understanding/Agreement Limiting External Party's Use**

**Section 5.4(i)** Yes No Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency, an international agreement or treaty, or contract with private vendor that provided the information to Treasury or one of its bureaus) that limits or places conditions on Treasury's internal use or external (i.e., outside Treasury) sharing of the [PII](#)?

*Treasury is a cross-services provider to other Treasury bureaus and Federal agencies pursuant to the U.S. Office of Personnel Management Human Resources Line of Business (HRLOB). An Interconnection Security Agreement (ISA) is countersigned by the Servicing Agency (Treasury) and the Requesting Agency (customer). The ISA documents the limitations, conditions, and proper usage of the application and the data by both the Servicing Agency and the Requesting Agency. As the Servicing Agency, Treasury provides data to the third- party application administrators listed in Section 5.4(a). There are agreements signed between Treasury and these third-party application administrators.*

#### **Memorandum of Understanding/Agreement Limiting External Party's Use**

**Section 5.4(i)** Yes No Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement in which Treasury limits or places conditions on an external party's use, maintenance, handling, or disclosure of [PII](#) shared by Treasury?

*Treasury is a cross-services provider to other Treasury bureaus and Federal agencies pursuant to the U.S. Office of Personnel Management Human Resources Line of Business (HRLOB).*

*An Interconnection Security Agreement (ISA) is countersigned by the Servicing Agency (Treasury) and the Requesting Agency (customer). The ISA documents the limits, conditions, and proper usage of the application and the data within by both the Servicing Agency and the Requesting Agency. As the Servicing Agency, Treasury provides data to the third- party application administrators listed in Section 5.4(a). There are agreements signed between Treasury and these third-party application administrators.*

*Contracts are also executed between Treasury offices and vendors who perform studies to allow the development of aggregate/ statistical data to measure internal performance of Treasury programs. These contractors receive raw data from the system for the limited purpose of conducting the study and developing aggregate statistical data. These contracts limit the vendor's use and disclosure of the data provided, including PII. The vendors are required to safeguard all data and other information, including PII received from the system. Vendors are also prohibited from using or disseminating such data and information for any purpose other than providing the services referenced in the contracts. The contracts also contain confidentiality provisions which prohibit vendor disclosure of any information obtained or prepared in the course of performing services under the contract. At the termination of the contract vendors are required to return all data provided upon request by Treasury. All government furnished information provided in conjunction with required performance under these contracts must be immediately returned at the written request of the Government after the purpose of the contract is completed (or before if terminated).*



External Information Sharing Chart 1			
<b>Section 5.4(k)</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Is information from the system or project shared externally?			
<b>External Recipient's Name</b>	Department of Agriculture, NFC	To on site contractors, grantees, experts, consultants, students, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for the Department of the Treasury.	To other Federal agencies and vendors with whom the Department has entered into a cross servicing agreement that provides for the delivery of automated human resources operations.
Purpose of the Sharing PII Shared	To provide all services related to processing payroll transactions applicable to the National Finance Center's Payroll/Personnel System (PPS).	When necessary to accomplish an agency function.	For the delivery of automated human resources operations. These operations may include maintaining current and historical payroll and personnel records, and providing reports, statistical surveys, rosters, documentation, and studies as required by the other federal agency to support its personnel administration activities.
Content of Applicable Routine Use/Citation to the <a href="#">SORN</a>	See above.	See above.	See above.
Applicable Statutory or Regulatory or Restrictions on Information Shared	Economy Act (31 U.S.C. 1535/FAR 17.5)	The Privacy Act of 1974.	The Privacy Act of 1974.
Name and Description of Relevant MOUs or Other Agreements Containing Sharing Restrictions Imposed on Treasury by an External Source or Source/Originating Agency \ (including description of restrictions imposed on use, maintenance, and disclosure of <a href="#">PII</a> )	Interagency Agreement (IAA) Number NFC-16-9101 Service Level Agreement Payroll/Processing System	Enterprise Business Solutions/HRConnect (EBS HRC) Agreement to Safeguard Sensitive Data form  Procurement contracts/statements of work with contractors and grantees who perform services.	The interagency agreement number relative to the particular cross-servicing agreement
Method(s) Used to Transfer <a href="#">PII</a> (e.g., paper/ oral disclosures/magnetic disk/portable device/email fax/other (please describe if other))	Electronic file feed, IPsec VPN tunnel	Direct login to a non-production HRConnect environment Transfer of data to the contractor is done via— Secure (encrypted) email with separate password	Electronic file feed, IPsec VPN tunnel

*risks presented and mitigation efforts >>*

### Obtaining Consent Prior to New Disclosures Not Included in the SORN or Authorized by the Privacy Act

**Section 5.4(l)** Yes No N/A Is the individual's consent obtained, where feasible and appropriate, prior to any **new** disclosures of previously collected records in a [system of records](#) (those not expressly authorized by the

[Privacy Act](#) or contained in the published [SORN](#) (e.g., in the routine uses)?

*There are no disclosures of previously collected records in the system of records not expressly authorized by the Privacy Act or contained in the routines uses in the published SORN.*

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## [Section 6: Compliance with federal information management requirements](#)

Responses to the questions below address the practical, policy, and legal consequences of failing to comply with one or more of the following federal information management requirements (to the extent required) and how those risks were or are being mitigated: (1) the [Privacy Act System of Records Notice](#) Requirement; (2) the [Paperwork Reduction Act](#); (3) the [Federal Records Act](#); (4) the [E-Gov Act](#) security requirements; and (5) [Section 508 of the Rehabilitation Act of 1973](#).

### [Section 6.1: Privacy Act System of Records Notice \(SORN\)](#)

For collections of [PII](#) that meet certain requirements, the [Privacy Act](#) requires that the agency publish a [SORN](#) in the *Federal Register*.

System of Records
<p><a href="#">Section 6.1(a)</a> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Does the system or project retrieve <a href="#">records</a> about an individual using an identifying number, symbol, or other identifying particular assigned to the individual? (see items selected in <a href="#">Section 4.2</a> above)</p>
<p><a href="#">Section 6.1(b)</a> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Was a <a href="#">SORN</a> published in the <i>Federal Register</i>?</p>
<p><i>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 of contractors/consultants) by the manager of the contract. The System of Record Notice is Treasury .001 – Treasury Personnel and Payroll System.</i></p>

### [Section 6.2: The Paperwork Reduction Act](#)

The [PRA](#) requires OMB approval before a Federal agency may collect standardized data from 10 or more respondents within a 12 month period. OMB requires agencies to conduct a PIA (a Treasury PCLIA) when initiating, consistent with the [PRA](#), a new electronic collection of PII for 10 or more persons (excluding agencies, instrumentalities, or employees of the federal government).

Paperwork Reduction Act Compliance
<p><a href="#">Section 6.2(a)</a> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Does the system or project maintain information obtained from individuals and organizations who are not federal personnel or an agency of the federal government (i.e., outside the federal government)?</p>
<p><a href="#">Section 6.2(b)</a> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A Does the project or system involve a new collection of <a href="#">information in identifiable form</a> for 10 or more persons from outside the federal government?</p>
<p><a href="#">Section 6.2(c)</a> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Did the project or system complete an Information Collection Request (“ICR”) and receive OMB approval?</p>
<p><i>While there is information for more than 10 individuals maintained within HRConnect, the information</i></p>

*request referenced in 6.2(b) was done one person at a time. Therefore, the PRA does not apply*

### **Section 6.3: Records Management - NARA/Federal Records Act Requirements**

Records retention schedules determine the maximum amount of time necessary to retain information in order to meet the needs of the project or system. Information is generally either disposed of or sent to the [NARA](#) for permanent retention upon expiration of this period.

#### **NARA Records Retention Requirements**

**Section 6.3(a)** Yes No Are the records used in the system or by the project covered by NARA's General Records Schedules ("GRS") or Treasury/bureau Specific Records Schedule (SRS)?

**Section 6.3(b)** Yes No Did NARA approved a retention schedule for the records maintained in the system or by the project?

**Section 6.3(c)** Yes No N/A If NARA did not approve a retention schedule for the records maintained in the system or by the project and the records are not covered by NARA's GRS or Treasury/bureau SRS, has a draft retention schedule (approved by all applicable Treasury and/or Bureau officials) been developed for the records used in this project or 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. Reports in the system are retained for 7-14 days, based on data management business rules. The procedures for disposition of 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.*

### **Section 6.4: E-Government Act/NIST Compliance**

The completion of Federal Information Security Management Act ("FISMA") Security Assessment & Authorization (SA&A) process is required before a federal information system may receive Authority to Operate ("ATO"). Different security requirements apply to National Security Systems.

#### **Federal Information System Subject to FISMA Security Assessment and Authorization**

**Section 6.4(a)** Yes No N/A Is the system a federal [information system](#) subject to FISMA requirements?

**Section 6.4(b)** Yes No N/A Has the system or project undergone a SA&A and received ATO?  
*No privacy or civil liberties issues were identified.*

#### **Access Controls and Security Requirements**

**Section 6.4(c)** Yes No Does the system or project include access controls to ensure limited access to information maintained by the system or project?

*Access to the data by a user is determined based upon the roles assigned to the user's profile. Roles are assigned based on position. Specifically, users will only have access to the data that is inherently theirs, such as their own personally identifiable information (PII). In the case of managers, they will have access to their own PII as well as limited information of those employees assigned to them. Additional roles may be assigned using strict 'need-to-know' criteria. The criteria, procedures, controls, and responsibilities regarding access are documented.*

## Security Risks When Collecting and Transferring Data

**Section 6.4(d)**  Yes  No In [Section 4.3](#) above, you identified the sources for information used in the system or project and the method and manner of collection. Were any security, privacy, or civil liberties risks identified with respect to the manner in which the information is collected from the source(s)?

*There were no security, privacy, or civil liberties risks identified with respect to the manner in which the information is collected from the source(s).*

**Section 6.4(e)**  Yes  No  N/A Are all Treasury/bureau security requirements met in the method of transferring information (e.g., bulk transfer, direct access by recipient, portable disk, paper) from the Treasury project or system to internal or external parties?

*The data in the system is shared with data owners (both internal and external to Treasury). These individuals must access the URL address via a secure and recognized connection to the Treasury network gateway and authenticate to the application using unique user credentials. Authorized third parties receive extracts of data in the system based on a 'need-to-know' basis and in accordance with a written agreement between themselves and the U.S. Department of Treasury, Office of the Chief Information Office, Enterprise Business Solutions,*

*HRConnect Program Office. The companies must then adhere to the prescribed configuration management principles and procedures in conjunction with the HRConnect Program Office information systems protocols to set up a periodic file feed with the extracted information. In support of the HSPD-12 Initiative, HRConnect has implemented Web Services to provide data exchange services with Treasury Debt Management Services (DMS). See section 5.4(j) above for a discussion of additional controls when information is shared with contractors who perform studies for Treasury.*

## [Section 6.5: Section 508 of the Rehabilitation Act of 1973](#)

When Federal agencies develop, procure, maintain, or use Electronic and Information Technology ("EIT"), [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998) requires that individuals with disabilities (including federal employees) must have access and use (including privacy policies and directives as well as redress opportunities) that is comparable to that which is available to individuals who do not have disabilities.

## Applicability of and Compliance With the Rehabilitation Act

**Section 6.5(a)**  Yes  No Will the project or system involve the development, procurement, maintenance or use of EIT as that term is defined in [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998)?

*The Rehabilitation Act is not applicable*

**Section 6.5(b)**  Yes  No  N/A Does the system or project comply with all [Section 508](#) requirements, thus ensuring that individuals with disabilities (including federal employees) have access and use (including access to privacy and civil liberties policies) that is comparable to that which is available to individuals who do not have disabilities?

*HRConnect is based on a COTS product (Oracle PeopleSoft). The COTS product platform for HRConnect has been evaluated by Oracle using the Voluntary Product Accessibility Template (VPAT).*

*The Voluntary Product Accessibility Template (VPAT) was developed by ITI and GSA to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of*

commercial Information and Communication Technology (ICT) products and services with features that support accessibility.

Oracle uses the VPAT to represent the degree of conformance to various accessibility standards and guidelines, including Section 508 (as released in 2001), WCAG 1.0, and WCAG 2.0. Depending on when a product was developed and released, different standards may be listed. Oracle is an active member on the ITI group that is working to enhance the VPAT to address future standards.<sup>1</sup>

The VPAT for PeopleSoft Enterprise PeopleTools 8.54, the current version of the application's foundational software, can be viewed at <http://www.oracle.com/us/corporate/accessibility/templates/t2-4023.html>

The analysis of the HRConnect application to identify the areas of non-compliance with 508 is expected to begin in Q2FY17. Once all gaps are identified, a plan will be developed for closing the gaps and bringing the system into full compliance. At that time, a mitigation strategy will be developed for any anticipated areas of non-compliance that persist. <http://www.oracle.com/us/corporate/accessibility/vpats/index.html>

## **Section 7: Redress**

### **Access Under the Freedom of Information Act and Privacy Act**

**Section 7.0(a)** Yes No Does the agency have a published process in place by which individuals may seek records under the [Freedom of Information Act](#) and [Privacy Act](#)?

*The Treasury/bureaus FOIA and PA disclosure regulations can be found at 31 C.F.R. Part 1, Subtitle A, Subparts A and C*

**Section 7.0(b)** Yes No Was any of the information that is maintained in [system of records](#) and used in the system or project exempted from the access provisions of the [Privacy Act](#)?

*The system is not exempt from the access provisions of the Privacy Act.*



## Responsible Officials

Timothy Skinner  
Director of Privacy and Civil Liberties  
Departmental Offices Privacy and Civil Liberties Officer  
U.S. Department of the Treasury

Chakravarthy Susarla  
Director - Enterprise Business Systems Development, HRConnect System Owner  
Office of the Chief Information Officer, Enterprise Business Systems

Nicolaos Totten  
Acting Associate Chief Information Officer Enterprise Business Solutions (EBS),  
HRConnect Authorizing Official  
U.S. Department of the Treasury

Approved by Reviewing Official:

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Timothy Skinner  
Bureau Privacy and Civil Liberties Officer  
Departmental Offices  
Director of Privacy and Civil Liberties  
Departmental Offices Privacy and Civil Liberties Officer  
U.S. Department of the Treasury

## Appendix A: Data Points and Descriptions

### Personnel Action Data

<i>Data Point(s)</i>	<i>Description</i>
Accession Codes	Series of codes used by OPM and the hiring agency to identify the legal authority for the action – initial hire, promotion, rehire, etc.
Action Code and Type	Type of last personnel action code and description. This element provides a means of identifying, by code, and related description, the type of action being processed.
Age	Age of employee (computed field), at the time the action was completed, and the age group of the employee.
Age at time of Action	
Age Range	
Agency Years of Service (YOS) at Time of Action	Number of years employee has been in federal service at time of action
Annuitant Code and Description	The status of an annuitant appointed to a position in the federal civilian service. This code indicates whether an employee is receiving retired or retained pay from previous civilian or military service.
Appointment Code(s)	Series of codes used by OPM and the hiring agency to identify the legal authority for the appointment.
Action Code(s) and Description	Nature of action code (and description of the code) under which the employee was converted.
Awards Received	Code used by OPM and the hiring agency to identify the type of award issued the employee.
Bargaining Unit Status	Indicates whether an employee is eligible for coverage by a bargaining unit, and if covered, the specific bargaining unit.
Base Contract Salary	Amount of an employee’s salary – stated as annual, monthly, daily or hourly as indicated by salary rate code.
Authority Code(s)	Series of codes used by OPM and the hiring agency to identify the legal authority for the action.
Current Employment Status	Employee’s current status.
Date of Accession	Date employee separated from agency or agency terminated employee.
Enter on Duty Date for Agency	Employee’s “Enter on Duty” date, more commonly known as start date, at the agency.
Appointment Effective Date	Date employee was appointed to Federal service.
Personnel Action Effective Date	Date the personnel action became effective
Service Computation Date	Service computation date (SCD) relative to specific personnel actions, including leave eligibility calculation, reduction in workforce, and within grade increase(s).
Department Name and Code	Code used to identify (and name of) the department of government the employee serves in.
Disability Description	The description of the physical or mental impairment which substantially limits one or more major life activities as identified by the employee; the record of such impairment; or the perception of such impairment by others.
Duty Station City, State, Name	Codes and names of the city, state, county and other related information of the duty station where the employee is primarily/permanently located.
Education Level	Code and description of the academic level of education attained by the employee.
Employee Ethnicity and Race	Ethnicity and Race Identification (ERI) code as identified by the employee.
Employment Type	Indicates if an employee is full-time, part-time, etc.
Fair Labor Standards Code	Indicates whether the employee is covered by the minimum pay and overtime provisions of the fair labor standards act.
Federal Service at Time of Action	Indicates amount of time in federal service at time of action.
FEGLI Eligibility	Code and description of employee’s eligibility (or ineligibility) for participation in the Federal Employees Group Life Insurance Program and, if eligible, whether the employee waived coverage, is participating, or has elected to be covered under the optional insurance plan as well as the regular plan.
FERS Coverage	Code and description of employee’s participation in Federal Employee Retirement System (FERS) coverage.
Internal Transfer Information	Codes used to identify where in the organization the employee came from or moved to in the event of an internal transfer.

<b><i>Data Point(s)</i></b>	<b><i>Description</i></b>
Geographic Rate Adjustment	Amount of money/salary adjusted for geographic location.
Geographic Percent Adjustment	The percent used to compute an employee's pay adjustment due to specific geographic location.
Headquarters Field Code	Code indicating whether an established record describes headquarters or field positions.
Instructional Program	A description of the employee's major field of study.
Targeted Disability Information	Code of the disabilities (other than the nine listed under targeted disabilities) as identified by employees.
FEGLI Coverage	Code and description of employee's coverage or no coverage under FEGLI.
Master Record Number	A number identifying a unique master position, linked to agency, position, and grade. Values are agency assigned standard job number and/or unique number.
Time Off Award Information	Code and description for time off award awarded to employee (individual or group).
Occupational Series	Code and description of the exact occupational group to which the employee's position has been classified.
Official Title Code	Code indicating the official or classification title of the employee's position.
Organizational Level(s)	Agency assigned codes established for the various levels of an organization (2-8).
Organization Name	Name of the organization
PATCO Code	Code and description of one of the seven major categories base on occupational series.
Pay Band	Pay band the employee's position falls into.
Pay Period Number	Pay period number in which the action took place (number of pay period that is currently being processed).
Pay Plan Information	Code and description of the pay plan to which the employee's position has been assigned.
Pay Rate Determinant	Records whether the employee is receiving a rate of pay other than the regular rate for the position, and, if so, to identify the legal and/or regulatory basis therefore, the pay rate.
Permanent or Temporary	Whether the employee's position is temporary or permanent.
Physical Handicap Code	A code to indicate whether or not an employee has a physical or mental handicap. This is used for statistical reporting and for placement of employees in positions that require special physical qualifications.
Person of Interest Code	Person of Interest code which identifies employment type.
Position Number	Specifically identifies, by number, the position occupied by the employee.
Position Official Title	Official title associated with the position occupied by the employee.
Position Sensitivity	The designation of the level of risk associated with a position.
Position Supervisory Code	The nature of managerial, supervisory or non-supervisory responsibility assigned to an employees' position.
Position Target Grade	The grade at which the employee's position will be properly classified when full potential is reached.
Remark Codes	Codes used to record those items of information which relate to the action being taken and which are required for documentation purposes.
Retirement Coverage	Code and description for the type of retirement/social security coverage held by the employee pursuant to his employment.
Salary Rate	Code and description outlining pay basis for which employee's salary is stated.
Scheduled Salary	Total salary is adjusted pay (basic pay plus locality pay) plus other pay. (Also known as "Scheduled Salary" or "Annual Salary".).
Separation Code	Code used to record personnel actions related to separation from an agency.
Sex Code	Indicates the sex of the employee.
Special Employment Programs	Identifies the employee to a special employment program area.
Start Date	Start date for tenure (as Federal employee). Presented as day, month, and year.
Tenure Group	Code and description used as a means of identifying, by code the tenure group which the employee occupies for reduction in force purposes (permanent or career).
Tour Of Duty Hours	Hours required by an employee, per pay period, for purposes of pay and benefits setting.

<b>Data Point(s)</b>	<b>Description</b>
Appointment Type Code	Identify the type of appointment given to an employee. The code will indicate into which service the employee has been placed and his status with respect to the type of appointment he holds.
Veteran's Status and Preference	Codes and descriptions associated with certain preferences granted veterans regarding reduction in workforce, hiring, status, etc.
Work Schedule	Code and description of work schedule type of the employee – for instance, compressed, regular, etc.
Sequence Number (for multiple records processed on the same effective date)	Number of action relative to other actions processed that day (for distinguishing order of actions processed on same day).

## Applicant Data

<b>Position/Requisition Data (details of the posting, per posting)</b>	
<b>Data Point</b>	<b>Description</b>
Requisition number	Unique number assigned to the job posting
Status of requisition	Current status of job posting (open, closed)
Close date	Date job posting closed (or is scheduled to close)
Date withdrawn (if applicable)	Date job posting withdrawn (retracted without being filled)
Fair Labor Standards Act (FLSA)	Whether the job is exempt from requirements of the FLSA
Open date	Date job posting opened
Filled	Whether job posting was filled – yes or no
Position pay grade/band	Pay grade or pay band for job in posting
Number of positions	Number of positions that may be filled from the job posting
Internal/external posting	Whether the posting is open to internal candidates only or internal and external candidates
<b>Applicant Data (per position)</b>	
Applicant ID number	Unique number assigned for each individual applicant for a job posting
Date of activity	Date of activity by an individual applicant specific to a job posting
Minimum qualifications	Whether the individual applicant met the minimum qualifications for the job
Date of application	Date the individual applied to the position in the job posting (submitted application)
Veteran preference	Whether the individual claimed a veteran's preference when applying for the position
Requisition number	Unique number assigned to the job posting
Disposition status	Whether the individual was selected for the position (hired)
Best qualified	Whether the individual was deemed "best qualified" for the position
Internal/external applicant	Whether the individual was an internal or external applicant
<b>Applicant Demographic Data (aggregated count per posting and separate from individual applicant data)</b>	
Race	As identified by the applicant from a provided selection in the application
Veterans status	As identified by the applicant from a provided selection in the application
Ethnicity	As identified by the applicant from a provided selection in the application

Gender	As identified by the applicant from a provided selection in the application
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### Employee Viewpoint Survey (EVS) Data 2013 - 2016

<b>Response Data (aggregated at the agency, office and organizational level)</b>	
Count of respondents to question(s) found in EVS	% of positive responses for each question found in EVS
% of neutral responses for each question found in EVS	% of negative responses for each question found in EVS
% of non-responses for each question found in EVS	

### Exit Interview Data (4/2016 – 9/2016)

<b>Response Data (aggregated narrative themes)</b>	
Time period (date range)	Total number of separations
Number of interviews held	Number of interviews declined
General narrative feedback, including: reason for leaving; leadership effectiveness; employee engagement and morale; contributions; culture; miss or strengths; work life programs; most attractive aspect of new opportunity; general suggestions.	

### Listening Session and Feedback Data

<b>Contact Data (Facilitate Participation in Listening Sessions)</b>	
Name	Business Email
Title	Business Phone
Office location (NY/DC)	
<b>Feedback Data (Aggregated and/or de-identified)</b>	
Survey responses regarding structure of listening sessions	General feedback and comments provided in listening sessions
Survey responses regarding topics for listening sessions	General feedback and comments provided on dedicated phone-line