# *The Bureau of the Fiscal Service*

# *Privacy Impact Assessment*

The mission of the Bureau of the Fiscal Service (Fiscal Service) is to promote the financial integrity and operational efficiency of the federal government through exceptional accounting, financing, collections, payments, and shared services.

This Privacy Impact Assessment is a Public document and will be made available to the general public via the Fiscal Service Privacy Impact Assessment (PIA) webpage (shown below).

Fiscal Service - Privacy Impact Assessments (PIA):
http://www.fiscal.treasury.gov/fsreports/rpt/fspia/fs_pia.htm

**Name of System: Personnel Action Workflow System (PAWS)**

**Document Version: 2.1**

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## SYSTEM GENERAL INFORMATION:

**1) System Overview:** The Personnel Action Workflow System (PAWS) is replacing the Classification and Recruitment Reporting System (CaRRS) and thus will track the all actions in the hiring process from initiation of the request to employee entry on duty and all actions in the position description classification process, from the date a request is received to the date the classification is completed. Data tracked will be primarily dates/times when actions are initiated, completed, or cancelled, and will also contain data on applicants (name, veteran status) and selectees (data from the OF-306, which includes name and SSN). PII won't necessarily be stored for all applicants. PII will potentially be stored for more than just selected applicants.

**2) Under which Privacy Act Systems of Records Notice (SORN) does the system operate? Provide number and name.**
Treasury/BPD.001, Human Resources and Administrative Records—Treasury/BPD

**3) If the system is being modified, will the SORN require amendment or revision?**
**__yes, explain.**
**X no**

**4) Does this system contain any personal information about individuals?**
**X yes**
**__no**

**a. Is the information about members of the public?** Yes

**b. Is the information about employees or contractors?** Yes

**5) What legal authority authorizes the purchase or development of this system?**
5 U.S.C. 301, 31 U.S.C. 321, 5 U.S.C Sections 1104 and 1304, 5 U.S.C Sections 3327 and 3330, 5 C.F.R Part 300 Subpart A, 31 U.S.C. Section 1535

## DATA in the SYSTEM:

**1) Identify the category of individuals in the system**
**Check all that apply:**
**X Employees**
**__ Contractors**
**__ Taxpayers**
**X Others (describe)** Records cover applicants and present and former employees, for both Fiscal Service and franchise customers.

2) **Identify the sources of information in the system**
**Check all that apply:**
   X **Employee**
   X **Public**
   X **Federal agencies**
   __ **State and local agencies**
   __ **Third party**

   a. **What information will be collected from employees or contractors?**
   Information on veteran/disability status and information to verify suitability for federal employment (data from the OF-306); contact information (email, phone)

   b. **What information will be collected from the public?**
   Information on veteran/disability status and information to verify suitability for federal employment (data from the OF-306); contact information (email, phone)

   c. **What Federal agencies are providing data for use in the system?**
   Bureau of the Fiscal Service and franchise customers

   d. **What state and local agencies are providing data for use in the system?**
   None

   e. **From what other third party sources will data be collected?**
   None

3) **Accuracy, Timeliness, and Reliability**

   a. **How will data collected from sources, other than Fiscal Service records, be verified for accuracy?**
   The Administrative Resource Center (ARC) will rely on the individual (applicant) and franchise customers to update their information as appropriate.

   b. **How will data be checked for completeness?**
   ARC will rely on the individual to ensure completeness of voluntarily-supplied data and on franchise customers to ensure that their data is complete.

   c. **What steps or procedures are taken to ensure the data is current?**
   Data for non-active cases is stored for historical (and auditing) purposes and thus will by definition become out of date at some point. Data on active cases will be as up-to-date as provided by individuals and franchise customers.

   d. **In what document(s) are the data elements described in detail?**
   Data elements are documented in the requirements document for PAWS.

## ATTRIBUTES OF THE DATA:

1) **How is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Eligibility and suitability of applicants cannot be assessed without data outlining their eligibility and suitability, thus collecting (and storing) such data is relevant and necessary.

2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? How will this be maintained and filed?**
No

3) **Will the new data be placed in the individual's record?**
There is no new data; see #2 above

4) **Can the system make determinations about employees or members of the public that would not be possible without the new data?**
There is no new data; see #2 above

5) **How will the new data be verified for relevance and accuracy?**
There is no new data; see #2 above

6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**
The data is not being consolidated.

7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? (Explain)**
The data is not being consolidated.

8) **How will the data be retrieved? (If personal identifiers are used to retrieve information on the individual, explain and list the identifiers that will be used to retrieve data.)**
Data will be retrieved based on reference numbers used by HR (Announcement Number, Staffing Request Number, etc.).

9) **What kind of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**
HR supervisors will have access to workload reports in order to manage work assignments, as well as access to historical activity reports to assess overall organization health and effectiveness.

10) **What opportunities do individuals have to decline to provide information (i.e., in such cases where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses)? How can individuals grant consent?**
Individuals provide information voluntarily during the recruitment process. Individuals do not have a means to directly input information into PAWS. At any point, for any reason, an individual can decline to provide information. There is no provision in the system for use of the information outside of what is required and authorized.

## MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) **What are the retention periods of data in this system? How long will the reports produced be kept?**
Records, electronic and paper, will be maintained in accordance with National Archives and Records Administration retention schedules.

2) **What are the procedures for disposition of the data at the end of the retention period? Where are the disposition procedures documented?**
Records in electronic media will be electronically erased using accepted techniques.

Reports, electronic and paper, will be maintained in accordance with National Archives and Records Administration retention schedules.

The Records Management Section is responsible for ensuring Fiscal Service's functions are adequately documented by ensuring permanent records are preserved, records no longer of current use are promptly destroyed, retention schedules are developed and implemented, and that Fiscal Service complies with the recordkeeping requirements issued by the Office of Management and Budget, the General Service Administration, the National Archives and Records Administration, and the National Institute of Standards and Technology (NIST). The procedures used to facilitate this process are documented on Fiscal Service's intranet.

3) **If the system is operated in more than one site, how will consistent use of the system and data be maintained at all sites?**
The system is hosted in a single virtual location, all interfaces and interactions are the same regardless of user location.

4) **Is the system using technologies in ways that Fiscal Service has not previously employed**
**(e.g., monitoring software, Smart Cards, Caller-ID)?**
No.

5) **How does the use of this technology affect employee or public privacy?**
N/A - The system is using technologies in ways that Fiscal Service has previously employed.

6) **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**
PAWS will provide for audit trails of user activity. Applicants have no access to PAWS and are thus not considered users of the system. There is no provision for locating individuals. Specifics of audit controls are addressed in the PAWS security documentation.

7) **What kind of information is collected as a function of the monitoring of individuals?**
1. Date and time of access
2. Subject identity (UserID)
3. Outcome of events
4. Information/file accessed or modified
5. User account management (creation, deletion, and modification)
6. Actions by privileged users

8) **What controls will be used to prevent unauthorized monitoring?**

Users are restricted to only data that is required in the performance of their duties. The concept of "least privileged" is followed at Fiscal Service whereas the information system shall enforce the most restrictive set of rights/privileges or accesses needed by users (or processes acting on behalf of users) for the performance of specified tasks.

Additionally, Fiscal Service's Rules of Behavior ensure that users and administrators are made aware of their security responsibilities before accessing Fiscal Service's IT resources. All users and administrators, including contractor and Government employees, are required to read and sign these rules acknowledging their responsibilities in protecting Fiscal Service's IT systems and data. Noncompliance with these rules may result in termination of access privileges, administrative actions, and/or criminal prosecution if warranted.

## ACCESS TO DATA:

1) **Who will have access to the data in the system?**
**Check all that apply:**

**X Contractors**
**X Users**
**X Managers**
**X System Administrators**
**X System Developers**
**__ Others (explain)_____**

2) **How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

Access to data by a user is determined by the user's profile based on the user's job requirements, managerial decisions, and the concept of least privilege.

Criteria, procedures, controls, and responsibilities regarding access are documented. Treasury Department Publication (TD P) 85-01 documents that the system manager is responsible for ensuring access to the information and data is restricted to authorized personnel on a "need-to-know" basis.

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

Users will be restricted to only data that is required in the performance of their duties. The concept of "least privilege" is followed at Fiscal Service whereas the information system shall enforce the most restrictive set of rights/privileges or accesses needed by users, or processes acting on behalf of users, for the performance of specified tasks.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

Fiscal Service's Rules of Behavior ensure that users and administrators are made aware of their security responsibilities before accessing Fiscal Service's IT resources. All users and administrators , including contractor and Government employees, are

required to read and sign these rules acknowledging their responsibilities in protecting Fiscal Service's IT systems and data. Noncompliance with these rules may result in termination of access privileges, administrative actions, and/or criminal prosecution if warranted.

5) **If contractors are/will be involved with the design, development or maintenance of the system, were Privacy Act contract clauses inserted in their contracts and were other regulatory measures addressed?**

   Yes, contractors are involved with the design and development of the system and will be involved with the maintenance of the system.

   Privacy Act clauses, statutory, and regulatory clauses were inserted into the contract.

6) **Do other systems share data or have access to the data in the system?**

   **__yes**
   **X no**
   No other systems have access to data within PAWS.

   **If yes,**

   **a. Explain the interface.**

   **b. Identify the role responsible for protecting the privacy rights of the public and employees affected by the interface.**

7) **Will other agencies share data or have access to the data in this system?**

   **X yes**
   **__no**

   **If yes,**

   **a. Check all that apply:**
   **X Federal**
   **__State**
   **__ Local**
   **__Other (explain) _____**

   **b. Explain how the data will be used by the other agencies.**
   Customer agencies will be given summary reports of their activity for billing/SLA purposes. Some customer agencies may be given raw extracts of data on their recruitment and classification activity for internal analysis.

   **c. Identify the role responsible for assuring proper use of the data.**
   Fiscal Service employees and contractor employees who support the PAWS, system owner and the Bureau CIO are responsible for assuring the proper use of data in the system.

   NIST requires Government organizations to establish and make readily available to all information system users a set of rules that describes their responsibilities and expected behavior with regard to information and information system usage. The

organization receives signed acknowledgement from users indicating that they have read, understand, and agree to abide by the rules of behavior, before authorizing access to the information system and its resident information.

The Fiscal Service Disclosure Officer is responsible for administering requests for system data submitted to Fiscal Service involving the Privacy Act. Fiscal Service fully complies with the provisions of the Freedom of Information Act, Title 5 U.S.C. Section 552, and the Privacy Act, Title 5 U.S.C Section 552a. Fiscal Service provides an established procedure to solicit requests to review and correct information recorded, and it has a dedicated Disclosure Officer who manages and administers the program.