

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

08/05/2016

**OPDIV:**

OS

**Name:**

Enterprise Workflow Information Tracking System

**PIA Unique Identifier:**

P-8338661-798208

**The subject of this PIA is which of the following?**

Minor Application (child)

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Operations and Maintenance

**Is this a FISMA-Reportable system?**

Yes

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

No

**Identify the operator.**

Agency

**Is this a new or existing system?**

Existing

**Does the system have Security Authorization (SA)?**

Yes

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

PIA Validation

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

None

**Describe the purpose of the system.**

Enterprise Workflow Information Tracking System (EWITS) is a web-based human resources (HR) application that is used by HHS personnel to track work activities; provide workflow management; monitor HR actions; and provide metrics for reporting. A description of each of these processes is provided below:

(i) Work Activities - describes a piece of work that forms one logical step within a process. An activity may be a manual activity, which does not support computer automation, or a workflow (automated) activity. A workflow activity requires human and/or machine resources to support execution; where human resource is required an activity is allocated to a workflow participant. Examples of work activities under each module in EWITS are, namely - "Review Recruitment", "Initial Response from HR" and "Notify HR Center".

(ii) Monitor HR Actions - A monitor tab within the EWITS application provides a diagram of the EWITS business process by which HR staff can monitor various stages of work activities for the different modules within EWITS such as Indian Health Service(IHS)\_Recruiting, Employment Relations/Labor Relations (ERLR), Parking, Transshare and Retirement.

(iii) Reporting - Reports from the EWITS system are used to communicate metrics to executives and managers of the modules. Thus, they can see at a glance the stages of all the business processes going on in EWITS.

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

The EWITS collects the following required information for the following purposes:

Access to the system is gained through HHS' Access Management System (AMS). The Personal Identity Verification (PIV) card is used to control employee and direct contractors' (users) access privileges via AMS. In the process users' name, email address and employee identification number (HHSID) are collected

For the parking assignments and Transshare subsidy reimbursement and employee notification of such: Name, HHS Identification (an HHS-generate unique employee identifier), vehicle identifiers (e.g., license plates), mailing address, Phone numbers (e.g., phone, fax, and cell), and E-mail address.

For retirement estimate requests and completed return of such requests: Name, HHS identification (ID), mailing address, phone numbers (e.g., phone, fax, and cell), e-mail address, military status and/or records, employment status and/or records.

For Employee Relations/Labor Relations cases and contacting employees: Name, HHSID, mailing address, phone numbers (e.g., phone, fax, and cell), and e-mail address.

For (IHS) Recruitment, contact information such as: Name, address, email address and phone number.

In the Recruitment module, contact Information (name, address, and email and phone number) is collected from the applicant. The HR Specialist who collects the information then enters the information manually into the EWITs recruitment module. Many of the applicants are public citizens at the time of the application.

EWITS no longer collects Social Security Numbers (SSN), making use of the HHSID instead.

All of these modules use personally identifiable information (PII).

Use of this data is implicit in the employer/employee relationship. Employees are expected to be aware that the business of HHS includes conducting analyses related to budgeting, staffing, and payroll.

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

EWITS is a web-based HR application that is used by HHS personnel to track work activities. It is used to track the posting of positions on USAJOBS and the identification of viable candidates under the process of certifying them as qualified for the positions to which they have applied. Other modules track business processes that relate to employee relations/labor relations (ER/LR), retirement, requests for executive and non-executive parking, and reimbursement for use of the Metro (the Transshare program). The system provides workflow management for these processes.

In the Recruitment module, contact Information (Name, Address, and email and phone number) is collected from the applicant.

The HR Specialist who collects the information then enters the information manually into the EWITS recruitment module. Many of the applicants are public citizens at the time of the application.

The pre-hire elements of EWITS are used only by the IHS.

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

Yes

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

Name

Vehicle Identifiers

E-Mail Address

Mailing Address

Phone Numbers

Military Status

Employment Status

Pay range, employee ID, and information related to employee relations/labor relations (ER/LR),

HHS User Credentials

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

Employees

Public Citizens

Vendor/Suppliers/Contractors

Information is kept on job applicants, many of whom are public citizens and the time of application.

**How many individuals' PII is in the system?**

50,000-99,999

**For what primary purpose is the PII used?**

As described previously, The EWITS collects PII for the following purposes:

-For the Parking assignments and Transshare subsidy reimbursement and employee notification of such

-For Retirement estimate requests and completed return of such requests

-For Employee Relations/Labor Relations cases and contacting employees

-For Recruitment PII is used in the identification of viable candidates under the process of certifying them as qualified for the positions to which they have applied.

-And, for controlling employees' access to the system

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

There are secondary uses for PII, which are reporting which may be requested by, and sent to, HR staff, supervisors, employees, Office of Personnel Management (OPM), Office of Management and Budget (OMB), or other agencies for the purposes of planning and policy development.

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

The implementation of this system, including activities such as the collection of PII necessary for operating it, are authorized by 5 U.S.C. 301. 42 U.S.C § 3502 creates the Office of the Assistant Secretary for Administration (ASA) at HHS, and among the duties delegated to the ASA are oversight of these services, which are necessary to developing and maintaining a workforce.

31 U.S.C. 66a; 5 U.S.C. 5501 et seq., 5525 et seq., 5701 et seq., and 6301 et seq.; Executive Order 9397; Pub. L. 100-202, Pub. L. 100-440, and Pub. L. 101-509

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

Yes

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

09-90-0006 Applicants for Employment Records

09-90-0018 Personnel Records in Op. Offices

**Identify the sources of PII in the system.**

**Directly from an individual about whom the information pertains**

In-Person

**Government Sources**

Within OpDiv

Other HHS OpDiv

Other Federal Entities

**Non-Governmental Sources**

Public

**Identify the OMB information collection approval number and expiration date**

Not Applicable

**Is the PII shared with other organizations?**

Yes

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

**Within HHS**

Information is shared within HHS Operating Divisions (OpDivs) only. PII is used as indicated to manage the workflow process for several HR related activities. Information is also shared with the Business Intelligence Information System (BIIS) to generate reports.

**Other Federal Agencies**

Reports may be requested by, and sent to, HR staff, supervisors, employees, OPM, OMB, or other agencies for the purposes of planning and policy development.

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

The HHS Office of the Inspector General (OIG) has an agreement with the HHS Office of the Secretary (OS) Chief Information Security Officer (CISO). OIG is responsible to perform the mandatory annual financial statement audit and the Federal Information Security Management Act (FISMA) evaluations. In support of the annual financial statement audit, they need to assess the supporting IT applications since an opinion is required of the effectiveness of such applications under the Federal Financial Management Improvement Act of 1996 (FFMIA) and Federal Managers Financial Integrity Act of 1982 (FMFIA).

**Describe the procedures for accounting for disclosures.**

Disclosures from this system are unlikely to be made, except in furtherance of the primary purpose of the system. If any nonstandard disclosures were to be made for any unanticipated reason, such that the disclosure was not a routine use, the system owner would maintain a record in a designated file to document who made the request; exactly what information on each individual was provided; and the date of the disclosure.

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

Information is collected from individuals. Consent is granted as part of the employee induction process.

## **Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

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

Individuals would be notified directly of major system changes that affect their rights or interests, but no such changes are anticipated. Changes would also be reflected by updates to the system of records notice (SORN).

Information is collected from individuals. Consent is granted as part of the employee induction process.

Use of this data is implicit in the employer/employee relationship. Employees must inherently understand that the business of HHS includes conducting analyses related to budgeting, staffing, and payroll.

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

Individuals would be notified directly of major system changes that affect their rights or interests, but no such changes are anticipated. Changes would also be reflected by updates to the SORN.

Information is collected from individuals and consent is granted as part of the employee induction process. While employment with HHS is optional, supplying this information is required in order to conduct necessary business at HHS. Information is used for budgeting, manpower staffing, and pay data reports.

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

EWITS maintains data for federal and civilian HHS employees. All formal and informal federal procedures are available for queries and concerns. Individuals may request assistance from supervisors, HR offices, Help Desk lines, or Information Security Officers, all of which would ultimately lead to correction or mitigation.

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

Employee data is corrected or updated by Human Resources personnel at the request of individuals. PII data critical to employee payroll is reviewed prior to submission to payroll process on a biweekly basis, and corrected if necessary.

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

### **Users:**

Data input and tracking purposes

### **Administrators:**

User account maintenance

### **Developers:**

Application development and maintenance

### **Contractors:**

Application maintenance

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

Access is restricted using an authorization process. Only privileged users with administrative rights can access PII.

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

Access rights are determined on a need to know basis when the user requests access. An annual recertification process is conducted to make sure user roles have not changed.

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

Information Systems Security Awareness and Privacy Awareness trainings are required annually. Rules of behavior must be acknowledged and signed before access is granted.

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

None

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

Yes

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

Records are retained and disposed of in accordance with National Archives and Records Administration's (NARA) General Records Schedule 2 (GRS 2.0) "Human Resources"

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

The following administrative, technical, and physical controls are in place for EWITS:

Administrative Controls:

- System security plan
- Contingency (or backup) plan
- File backup
- Backup files stored off site
- User manuals
- Security Awareness
- Training
- Contractor Agreements
- Least Privilege Access

Technical Controls:

- User Identification and Passwords
- Firewall
- Encryption

Physical Controls:

- Guards
- Identification Badges
- Key Cards

The system will be secured by methods prescribed in the System Security Plan (SSP). The SSP calls for system life-cycle practices for Federal financial systems. The methods employed include risk assessments and implementation of management, operational, and technical controls.