

Privacy and Civil Liberties Impact Assessment Template



Privacy and Civil Liberties Impact Assessment

for the

HRConnect System

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Reviewing Official

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Department of the Treasury

Section 1: Introduction

PCLIAAs are required for all systems and projects that collect, maintain, or disseminate personally identifiable information (PII). The system owner completed this assessment 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 (not including agencies, instrumentalities, or employees of the federal government).

It is the policy of the Department of the Treasury (“Treasury” or “Department”) and its Bureaus to conduct a PCLIA when PII is maintained in a system or by a project. 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.

Section 2: System Overview

Section 2.1: System/Project Description and Purpose

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 Platform as a Service or Software as a Service); customized PeopleSoft HR software residing on the Oracle Cloud Infrastructure’s GovCloud Infrastructure as a Service Cloud Service Provider.

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 (non-Treasury HRConnect users) as part of a cross- services initiative to reduce federal government expenditures. The following are the non-Treasury HRConnect users (or components of those users):

- 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).

The information collected and maintained in the system is used by Treasury and non-Treasury HR Connect users 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.

Treasury is updating this PCLIA to include the collection, use, and disclosure of Employee/Onboarding Employees' vaccination status and proof of vaccination information in HRConnect. Treasury (except the Office of the Comptroller of the Currency) and participating non-Treasury users of HRConnect (except the General Accountability Office, the Department of Labor, the Bureau of Alcohol, Tobacco, and Firearms, and the United States Agency for International Development) are collecting employee/onboarding employee vaccination status information in HR Connect (non-Treasury agencies that are using HRConnect to collect vaccination status information are referred to in this PCLIA as non-Treasury users "participating in vaccination status collection using HRConnect"). Treasury completed and published a separate PCLIA

covering [Treasury’s Collection, Use, and Disclosure of Employee/Onboarding Employees’ Vaccination Status and Proof of Vaccination Information](#) (“Treasury Vaccination Status PCLIA”). By this reference, Treasury is incorporating the content of the Treasury Vaccination Status PCLIA into the HR Connect PCLIA as it relates to Treasury. Other non-Treasury HR Connect users may also incorporate the Treasury Vaccination Status PCLIA into the HRConnect PCLIA by posting a link to both the Treasury HRConnect and Treasury Vaccination Status PCLIA on their public-facing website where they post Privacy Impact Assessments (PIAs) or PCLIA. Non-Treasury HRConnect users may also choose to draft their own vaccination status PCLIA or adapt the language in the Treasury Vaccination Status PCLIA to reflect information unique to their agency. Employees of non-Treasury HRConnect users should visit the website where their agency publishes its PIAs/PCLIA and consult with their privacy officials as needed.

In accordance with Executive Order No. 14043, Treasury will collect and store vaccination status information of Federal employees and onboarding Treasury employees to align with the guidance, principles, and best health practices provided by the Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA). The collection of this information will be used for purposes of determining which safety measures individual Federal employees must follow while working in a Treasury facility. Treasury will collect vaccine type and date of final vaccine dose (required to establish a full dose) to allow Treasury to notify employees when a booster/supplemental vaccine becomes available with respect to the particular vaccine they received and to ensure that Treasury continues to meet CDC requirements for vaccinated/unvaccinated employees. The information currently collected for these purposes is based on an evolving understanding of the pandemic and safety protocols for individuals who are fully vaccinated and not fully vaccinated. These principles will be reassessed over time, as conditions warrant and as CDC guidelines are updated.

[PII](#) is used to identify employees for the purpose of carrying out the system objectives, as described above.

1. A PCLIA is being done for this system for the first time.
2. This is an update of a PCLIA previously completed and published under this same system or project name. The date the earlier PCLIA was published was December 19, 2019.
3. This is an update of a PCLIA previously completed and published for a similar system or project that is undergoing a substantial modification or migration to a new system or project name. The name of that previous PCLIA was [Name the PCLIA here] and the date of its publication was 1.1.2020

Section 2.2: Authority to Collect

Federal agencies must have proper authority before initiating a collection of information. The authority is sometimes granted by a specific statute, by Executive order (EO) of the President or other authority. The following specific authorities authorize HRConnect to collect information:

- 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.

- The authority to collect vaccination status information is derived from the General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health (OSH) Act of 1970, Executive Order 12196, Occupational safety and health programs for Federal employees (Feb. 26, 1980), OMB Memorandum M-20-23, Aligning Federal Agency Operations with the National Guidelines for Opening Up America Again (Apr. 20, 2020), and 5 U.S.C. § 6329c(b).
- EO 14043, Requiring Coronavirus Disease 2019 Vaccination for Federal Employees.

OPM Guidance on Applying Coronavirus Disease 2019 Vaccination Requirements to New Hires – Executive Order 14043. The information may also be collected pursuant to a more general requirement or authority. All Treasury systems and projects derive general authority to collect information from:

- 31 U.S.C. 321 – General authorities of the Secretary establish the mission of the Department of the Treasury
- 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.

Section 2.3: Privacy Act Applicability; SORN Requirement

Under certain circumstances, federal agencies are allowed to exempt a system of records from certain provisions in the Privacy Act. This means that, with respect to information systems and papers files that maintain records in that system of records, the agency will not be required to comply with the requirements in Privacy Act provisions that are properly exempted. If this system or project contains records covered by the Privacy Act, the applicable Privacy Act system of records notice(s) (SORNs) (there may be more than one) that cover the records in this system or project must list the exemptions claimed for the system of records (it will typically say: “*Exemptions Claimed for the System*” or words to that effect).

Helpful Hint for answering questions in this section and later questions about Privacy Act exemptions: If you know there is a SORN covering the PII in this system, the answer is probably “yes.” If the system maintains PII, but that PII is not actually retrieved by a personal identified, the answer is “no.” At the bottom of the applicable SORN(s), you will find a section that says: “Exemptions Claimed for the System.” If the answer is “None” (or anything that indicates no exemptions are claimed): (1) your bureau or office does not exempt the system of records from any Privacy Act requirements; and (2) when you are asked in this template whether your bureau or office exempts the system of records from certain provisions in the Privacy Act, your answer will always be “No.”

All answers in this section must be provided in the space as instructed after checking the appropriate box(es).

Section 2.3(a) Please check ALL statements below that apply to your system or project and provide any additional information requested. Please read all possible responses before selecting an answer.

1. The system or project does not retrieve records about an individual using an identifying number, symbol, or other identifying particular assigned to the individual. A SORN is not required with respect to the records in this system.
2. The system or project does retrieve records about an individual using an identifying number, symbol, or other identifying particular assigned to the individual. A SORN is required with respect to the records in this system.
3. A SORN was identified in the original PCLIA and a determination was made during this current PCLIA update that modifications [choose one] were were not required to that

SORN. [If modifications were made, generally describe them here]. The current applicable SORN is: [Provide here the SORN number(s), system of records name(s) and the citation to the SORN(s) in the Federal Register.]

4. A SORN(s) was not identified or required in the original PCLIA, but a determination was made during this current PCLIA update that a SORN(s) is now required. The applicable SORN(s) is:[Provide here the SORN number(s), system of records name(s) and the citation to the SORN(s) in the Federal Register].
5. A SORN was published and no exemptions are taken from any Privacy Act requirements. [Treasury .001 - Treasury Payroll and Personnel System - 83 FR 35376](#) (Jul. 2, 2021) and [Treasury .020 – Health Screening and Contact Tracing Records - 86 FR 11381 \(Feb. 24, 2021\) \(for vaccination status records\)](#). Most non-Treasury HR connect users participating in vaccination status collection using HRConnect (for example the Department of Housing and Urban Development (HUD)) rely on Office of Personnel Management/Government-wide -10, Employee Medical File System Records, as the SORN covering collection of their vaccination status records. Employees/onboarding employees working for non-Treasury HR connect users that are participating in vaccination status collection using HRConnect should consult their agency’s privacy website or contact their privacy office for additional information.
6. Exemptions are claimed from the following Privacy Act provisions in the applicable SORN(s): [List here all exemptions taken in the applicable SORN; Hint: it’s at the end of the SORN]: The citation to the applicable Notice of Proposed Rulemaking and/or Final Rule is[provide here the Federal Register Citation to the NPRM and Final Rule (if a Final Rule was required)].

Section 3: Information Collection

Section 3.1: 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 accomplished 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. 5 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 3.1(a) Exemption Claimed from this Requirement?

1. The PII maintained in this system or by this project is ***not*** exempt from 5 U.S.C. § 552a(e)(1), the Privacy Act’s requirement that an agency “*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 accomplished by statute or by executive order of the President.*”

2. The PII maintained in this system or by this project **is** exempt from 5 U.S.C. § 552a(e)(1), because *[See Appendix B for a list of acceptable bases for claiming this exemption and cut and paste **here** all that apply].*

Section 3.1(b) Continuously Assessing Relevance and Necessity

1. The PII in the system is not maintained in a system of records. Therefore, the Privacy requirements do not apply. *[Explain **here** what you do to ensure relevance and necessity despite the fact that the Privacy Act does not apply].*
2. The PII in the system is maintained in a system of records, but the agency exempted these records from the relevance and necessity requirement. *[Explain **here** what you do to ensure relevance and necessity to the extent possible despite the fact the records are exempt from this requirement].*
3. The system owner conducted an assessment prior to collecting PII for use in the system or project to determine which PII data elements and types (see [Section 3.2](#) below) were relevant and necessary to meet the system’s or project’s mission requirements. During this analysis, *in* conducting the “relevance and necessity” analysis that is documented in this PCLIA, the system owner reevaluated the necessity and relevance of all PII data elements and determined that they are still relevant and necessary. Every time this PCLIA is updated, this ongoing assessment will be revisited. If it is determined at any time that certain PII data elements are no longer relevant or necessary, the system owner will update this PCLIA to discuss how the data element was removed from the system and is no longer collected.
4. With respect to PII **currently** maintained (as of the time this PCLIA is being done) in the system or by the project, the PII *[choose one]* is is not limited to only that which is relevant and necessary to meet the system’s or project’s mission requirements. During the PCLIA process, the system always undergoes a review to ensure the continuing relevance and necessity of the PII in the system.
5. With respect to PII maintained in the system or by the project, there *[choose one]* is is not a process in place to continuously reevaluate and ensure that the PII remains relevant and necessary. During the PCLIA process, the system always undergoes a review to ensure the continuing relevance and necessity of the PII on the system. If a determination is made that particular PII is no longer relevant and necessary in between PCLIA updates, this PCLIA will be updated at that time.

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 functionalities 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 3.2) 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.

HRConnect contains the following data fields that must be completed by employees of Treasury and non-Treasury users participating in vaccination status collection using HRConnect

Vaccination Status:

Employees are required to select from one of the following options available in the dropdown screen:

- *BOOSTER- I have received a booster vaccination.*
- *FULLY- I am fully vaccinated.*
- *GAODECLINE GAO USE ONLY - I decline to respond.*
- *NOVACCINE - I am not vaccinated.*
- *PARTIAL - I am not yet fully vaccinated.*
- *REQUESTED RA - I am not vaccinated and have requested a Reasonable Accommodation (RA statuses: Approved, Denied, Pending).*

Vaccination Type:

Employees are required to select from one of the following options available in the dropdown screen:

- *ASTRABOOST AstraZeneca/Oxford Booster Vaccination*
- *ASTRAZENECA AstraZeneca/Oxford*
- *J&J Johnson & Johnson/Janssen*
- *J&JBOOST Johnson & Johnson/Janssen Booster Vaccination*
- *MODBOOST Moderna Booster Vaccination*
- *MODERNA Moderna*
- *NOVAVAX Novavax*
- *PFIZER Pfizer-BioNTech*
- *PFIZERBOOST Pfizer-BioNTech Booster Vaccination*

Date of last vaccination (with calendar dropdown)

Attestation Statement:

Employees must click an “attest” box to certify the following: “I understand that a knowing and willful false statement on this form can be punished by fine or imprisonment or both (18 U.S.C. 1001). I understand that making a false statement on this form could result in additional administrative action including an adverse personnel action up to and including removal from my position.”

Attachment:

Employees must attach one of the following documents to prove vaccination:

- A record of immunization from a health care provider or pharmacy,
- CDC COVID-19 Vaccination Record Card,
- Medical records documenting the vaccination,
- Immunization records from a public health or state immunization information system, or
- Any other official documentation containing the required data points.

Treasury determined that all of this information is both relevant and necessary to administer the authorities listed in section 2.2 of this PCLIA. Non-Treasury users participating in vaccination status collection using HRConnect may instruct their employees to collect some or all of the available data fields, depending on their authorities and requirements. At the top of the vaccination page in HRConnect, employees are invited to: “Please enter vaccination information **as required by your Agency.**” (emphasis added). The HRConnect system permits the individual to update their data throughout their employment to keep it current as long as their agency continues to use HRConnect’s vaccination status.

Section 3.2: PII and/or information types or groupings

The checked boxes below represent the types of information maintained in the system or by the project that are relevant and necessary for the information system or project to fulfill its mission. PII identified below is used by the system or project to fulfill the purpose stated in Section 2.2 above– Authority to Collect.

Biographical/general information

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Name | <input checked="" type="checkbox"/> Nationality | <input checked="" type="checkbox"/> Country of Birth |
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Citizenship | <input type="checkbox"/> Immigration Status |
| <input checked="" type="checkbox"/> Date of birth | <input checked="" type="checkbox"/> Ethnicity | <input checked="" type="checkbox"/> Alias (including nickname) |
| <input checked="" type="checkbox"/> Home physical/postal mailing address | <input checked="" type="checkbox"/> Gender | <input checked="" type="checkbox"/> City or County of Birth |
| <input checked="" type="checkbox"/> Zip Code | <input checked="" type="checkbox"/> Race | <input checked="" type="checkbox"/> Military Service Information |
| <input checked="" type="checkbox"/> Personal home phone, cell phone, or fax number | <input checked="" type="checkbox"/> Personal e-mail address | <input checked="" type="checkbox"/> Country or city of residence |
| | <input type="checkbox"/> Other: (please describe) | |

Other information

- | | | |
|--|--|---|
| <input type="checkbox"/> Resume or curriculum vitae | <input checked="" type="checkbox"/> Cubical or office number | <input checked="" type="checkbox"/> Veteran’s preference |
| <input checked="" type="checkbox"/> Religion/Religious Preference | <input checked="" type="checkbox"/> Education Information | <input checked="" type="checkbox"/> Spouse Information |
| <input type="checkbox"/> Professional/personal references or other information about an individual’s friends, associates or acquaintances. | <input checked="" type="checkbox"/> Contact lists and directories (known to contain at least some personal information). | <input checked="" type="checkbox"/> Retirement eligibility information |
| <input type="checkbox"/> Sexual Orientation | <input checked="" type="checkbox"/> Marital Status | <input checked="" type="checkbox"/> Information about other relatives. |
| <input checked="" type="checkbox"/> Group/Organization Membership | <input checked="" type="checkbox"/> Information about children | <input checked="" type="checkbox"/> Other: Employment type (full or part-time), <u>Eligibility for and coverage under Federal Employees Group Life Insurance Program. Eligibility for and coverage under Federal Employee Retirement System (FERS) coverage. Occupational series, Official Title Code, pay band, Whether the employee’s position is temporary or permanent, Official title associated with the position, Work schedule type, Position Target Grade, Instant Message ID (IM) (table is under personal data CWR), Language proficiency (languages spoken)</u> |

Identifying numbers assigned to individuals

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Full Social Security number | <input checked="" type="checkbox"/> Personal device identifiers or serial numbers | <input type="checkbox"/> Vehicle Identification Number |
| <input checked="" type="checkbox"/> Truncated Social Security Number (e.g., last 4 digits) | <input type="checkbox"/> Internet Protocol (IP) Address | <input type="checkbox"/> Driver's License Number |
| <input checked="" type="checkbox"/> Employee Identification Number | <input checked="" type="checkbox"/> Personal Bank Account Number | <input type="checkbox"/> License Plate Number |
| <input type="checkbox"/> Taxpayer Identification Number | <input type="checkbox"/> Health Plan Beneficiary Number | <input checked="" type="checkbox"/> Professional License Number |
| <input type="checkbox"/> File/Case ID Number | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Passport Number and information (nationality, date and place of issuance, and expiration date) |
| <input type="checkbox"/> Alien Registration Number | <input type="checkbox"/> Patient ID Number | <input checked="" type="checkbox"/> Other: <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> |

Specific Information/File Types

- | | | |
|--|--|--|
| <input type="checkbox"/> Taxpayer Information/Tax Return Information | <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Security Clearance/Background Check Information |
| <input type="checkbox"/> Civil/Criminal History Information/Police Records (obtained from government source) | <input type="checkbox"/> Civil/Criminal History Information/Police Records (obtained from commercial source) | <input type="checkbox"/> Credit History Information (government source) |
| <input type="checkbox"/> Protected Information (as defined in Treasury Directive 25-10) | <input type="checkbox"/> Credit History Information (commercial source) | <input type="checkbox"/> Bank Secrecy Act Information |
| <input type="checkbox"/> Information provided under a confidentiality agreement | <input type="checkbox"/> Case files | <input type="checkbox"/> Personnel Files |
| <input type="checkbox"/> Business Financial Information (including loan information) | <input type="checkbox"/> Personal Financial Information (e.g., loan information) | <input type="checkbox"/> Information subject to the terms of an international or other agreement |
| <input type="checkbox"/> Passport information (state which passport data elements are collected if not all) | <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 type="checkbox"/> Files and folders accessed by a user of Treasury IT | <input type="checkbox"/> Biometric information used to access Treasury facilities or IT |
| <input checked="" type="checkbox"/> Passwords generated by or assigned to a user of Treasury IT | <input type="checkbox"/> Internet or other queries run by a user of Treasury IT | <input type="checkbox"/> Contents of files accessed by a user of Treasury IT |
| <input type="checkbox"/> Files accessed by a user of Treasury IT (e.g., web navigation habits) | <input checked="" type="checkbox"/> Date and time an individual accesses a facility, system, or other IT | <input type="checkbox"/> Information revealing an individual's presence in a particular location as derived from security token/key fob, employee identification card scanners or other IT. |
| <input type="checkbox"/> Public Key Information (PKI). | <input type="checkbox"/> Still photos of individuals derived from security cameras. | <input type="checkbox"/> Purchasing habits or preferences |
| <input type="checkbox"/> Internet Protocol (IP) Address | <input type="checkbox"/> Video of individuals derived from security cameras | <input type="checkbox"/> Commercially obtained internet navigation/purchasing habits of individuals |
| <input type="checkbox"/> Global Positioning System (GPS)/Location Data | <input type="checkbox"/> Secure Digital (SD) Card or Other Data stored on a card or other technology | <input type="checkbox"/> Device settings or preferences (e.g., security level, sharing options, ringtones). |
| <input type="checkbox"/> Network communications data | <input type="checkbox"/> Cell tower records (e.g., logs, user location, time etc.) | <input type="checkbox"/> Other: (please describe) |

Medical/Emergency Information Regarding Individuals

- | | | |
|--|---|--|
| <input type="checkbox"/> Medical/Health Information | <input type="checkbox"/> Worker's Compensation Act Information | <input checked="" type="checkbox"/> Emergency Contact Information (e.g., a third party to contact in case of emergency) |
| <input type="checkbox"/> Mental Health Information | <input checked="" type="checkbox"/> Information regarding a disability | <input type="checkbox"/> Patient ID Number) |
| <input type="checkbox"/> Sick leave information | <input type="checkbox"/> Request for an accommodation under the Americans with Disabilities Act | <input type="checkbox"/> Patient ID Number |
| <input checked="" type="checkbox"/> Other: (please describe) COVID 19 vaccination Status (original vaccination and booster), Date of Last Vaccination required for full dose. See Section 3.1(b) of this PCLIA for a detailed description. | <input checked="" type="checkbox"/> Other (please describe): COVID 19 vaccination type (original vaccination and booster, if different) and date of last shot required for full vaccination (including booster). See Section 3.1(b) of this PCLIA for a detailed description. | <input checked="" type="checkbox"/> Other (please describe): Attestation regarding truth of information provided. See Section 3.1(b) of this PCLIA for a detailed description. |

Biometrics/Distinguishing Features/Characteristics of Individuals

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Physical description/ characteristics (e.g., hair, eye color, weight, height, sex, gender etc.) Identify which are collected: (Insert collected here) | <input type="checkbox"/> Signatures | <input type="checkbox"/> Palm prints |
| <input type="checkbox"/> Fingerprints | <input type="checkbox"/> Photos/Video: (identify which) | <input type="checkbox"/> Voice audio recording |
| <input type="checkbox"/> Other: (please describe) | | |

Identifying numbers for sole proprietors (including business information).

- | | | |
|---|---|--|
| <input type="checkbox"/> Sole proprietor business credit card number | <input type="checkbox"/> Business Phone or Fax Number | <input type="checkbox"/> Business Physical/Postal Mailing Address |
| <input type="checkbox"/> Sole proprietor business professional license number | <input type="checkbox"/> Sole proprietor business file case number | <input type="checkbox"/> Sole proprietor business taxpayer identification number |
| <input type="checkbox"/> Sole proprietor business license plate number | <input type="checkbox"/> Sole proprietor business vehicle identification number | <input type="checkbox"/> Sole proprietor business bank account number |
| <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): |

Applicants who receive and accept job offers for employment with a Federal agency that is serviced by HRC submit the information in Section 3.2 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 EODS, these forms are completed within EODS and some of the information in these forms (not the form itself) and in USA Staffing is sent to HRC via a secure interface.

Form	EODS	HRC
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

Form	EODS	HRC
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
42	U.S. Certificate of Naturalization

*Form ID	Description
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
General Onboarding Forms		
<i>Declaration for Federal Employment</i>		
OF-306	Declaration for Federal Employment	All Data Elements in OF-306 pertain to the Applicant
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>		
SE-61	Appointment Affidavit	All Data Elements in SF-61 pertain to the Applicant
Applicant Name	Notary Public Commission Seal information	
<i>Statement of Prior Federal Service</i>		
SE-144	Statement of Prior Federal Service	All Data Elements in SF-144 pertain to the Applicant
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>		
SE-181	Ethnicity and Race Identification	All Data Elements in SF-181 pertain to the Applicant
Applicant Name	Social Security Number	Date of Birth
Ethnicity/Race		
<i>Self-Identification of Disability</i>		
SE-256	Self-Identification of Disability	All Data Elements in SF-256 pertain to the Applicant
Applicant Last Name, First Name, and Middle initial	Date of Birth	Social Security Number
<i>Direct Deposit Sign-up</i>		
SE-1199A	Direct Deposit Sign-Up	Data Elements in SF-1199A pertain to the Applicant and Joint Payee and Joint Account holder information
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

Form ID	Form Name	Data Elements
Applicant Telephone number	Payee/Joint Payee Certification require Signature	Type of Depositor Account Checking or Savings
FERS Election of Coverage		
SE-3109	FERS Election of Coverage	Data Elements in SF-3109 pertain to the Applicant and Former Spouse Information
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	
Designation of Beneficiary (CSRS)		
SE-2808	Designation of Beneficiary (CSRS)	Data Elements in SF-2808 pertain to Applicant and Designation for beneficiary or beneficiaries
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	
Designation of Beneficiary (FGLI)		
SE-2823	Designation of Beneficiary (FGLI)	Data Elements in SF-2823 pertain to the Applicant and Beneficiary for the applicant
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
Designation of Beneficiary (FERS)		
SE-3102	Designation of Beneficiary (FERS)	Data Elements in SF-3102 pertain to the Applicant and Beneficiary
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
Designation of Beneficiary Unpaid Compensation of Deceased Fed Employee		
SE-1152	Designation of Beneficiary Unpaid Compensation of Deceased Fed Employee	Data Elements in SF-1152 pertain to the Applicant and Beneficiary for the applicant
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		
Thrift Savings Plan Designation of Beneficiary		
TSP-3	Thrift Savings Plan Designation of Beneficiary	Data Elements in TSP-3 pertain to the Applicant and Beneficiary

Form ID	Form Name	Data Elements
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
<i>Employee Election Form</i>		
<u>TSP-1</u>	Thrift Savings Plan Enrollment	All Data Elements in TSP-1 pertain to the Applicant
Applicant Name Last, First Middle	Address	Social Security Number
Home Phone Number		
<i>TSP Catch-Up Contribution Form</i>		
<u>TSP-1-C</u>	TSP Catch-Up Contribution	All Data Elements in TSP-1-C pertain to the Applicant
Applicant Name Last, First, Middle	Social Security Number	Phone Number
Address		
<i>Premium Conversion Waiver/Election</i>		
<u>DG-60</u>	Premium Conversion Waiver/Election Form	All Data Elements in DG-60 pertain to the Applicant
Applicant Last Name, First Name, Middle Initial	Social Security Number	Applicant Last Name, First Name, Middle Initial
<i>Life/Health Insurance/Benefits</i>		
<u>SF-2809</u>	Employee Health Benefit Election (FEHB)	Data Elements in SF-2809 pertain to the Applicant and Eligible family member/s
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		
<i>Life Insurance Election (FEGLI)</i>		
<u>SF-2817</u>	Life Insurance Election (FEGLI)	All Data Elements in SF-2817 pertain to the Applicant
Name last, first, middle	Social Security Number	Telephone number
Date of birth	Office of Worker's Compensation Programs (OWCP)	
<i>Withholding Allowances/Exemption Certificate</i>		
<u>W-4</u>	Employee Withholding Allowance	All Data Elements in W4 pertain to the Applicant
Name First, Middle initial, Last Name	Home Address	Marital Status
Employee Address		

Form ID	Form Name	Data Elements
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	
Employment Eligibility Verification		
L-9	Employment Eligibility Verification	Not All Data Elements in form
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
Personal Identity Verification for Federal Employees and Contractors		
Form 13760	Personal Identity Verification for Federal Employees and Contractors	Not All Data Elements in form pertain to the Applicant
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
Certificate of Non-residence in the District of Columbia		
Form D-4A	Certificate of Non-residence in the District of Columbia	Not All Data Elements in form pertain to the Applicant
Name First, Middle Initial, Last Name	Temporary DC address	Social Security Number
Permanent Address	Signature	
Notification of Personnel Action		
SE-50	Notification of Personnel Action	Not All Data Elements in form pertain to the Applicant
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	
Transfer of Information Between Agencies		
TSP-19	Thrift Savings Plan	Not All Data Elements in form pertain to the Applicant
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		
Personnel Public Financial Disclosure Report		

Form ID	Form Name	Data Elements
OGE Form 278e	Personnel Public Financial Disclosure Report	Not All Data Elements in form pertain to the Applicant
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		
Confidential Financial Disclosure Report		
OGE Form 450	Confidential Public Financial Disclosure Report	Not All Data Elements in form pertain to the Applicant
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
US Department of State Foreign Service Designation of Beneficiary		
DS-5002	Designation of Beneficiary	Data Elements in DS-5002 pertain to Applicant and Designation for beneficiary or beneficiaries
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	

3.3 Sources from which PII is obtained

Focusing on the context in which the data was collected and used (i.e., why it is collected and how it is used), check **ALL** sources from which PII is collected/received and stored in the system or used in the project

1. Members of the Public

Members of the Public (i.e., including individuals who are current federal employees who are providing the information in their “personal” capacity (unrelated to federal work/employment). All of the following are members of the public. Please check relevant boxes (based on the context of collection and use in this system) for members of the public whose information is maintained in the system (only check if relevant to the purpose for collecting and using the information):

- Members of the general public (current association with the federal government, if any, is irrelevant to the collection and use of the information by the system or project). Discuss here how/why PII is collected from this source.
- Retired federal employees. Discuss here how/why PII is collected from this source.

- Former Treasury employees. Discuss here how/why PII is collected from this source.
- Federal contractors, grantees, interns, detailees etc. Discuss here how/why PII is collected from this source.
- Federal job applicants. *Applicants who receive and accept job offers for employment (new employees) with a Federal agency that is serviced by HRC submit information using the forms listed in Section 3.2, 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.*
- Other: [Discuss here how/why PII is collected from this source.

2. *Current Federal Employees, Interns, and Detailees*

- Current Federal employees providing information in their capacity as Federal employees (for example, PII collected using OPM or Treasury forms related to employment with the federal government)
- Interns (*Federal Pathways interns only*). *Vaccination status information is collected from Federal Pathways interns in accordance with OPM requirements.*
- Detailees. Discuss here how/why PII is collected from this source.
- Other employment-related positions. [name the position here and discuss how/why PII is collected from this source.].

3. *Treasury Bureaus (including Departmental Offices)*

- Other Treasury Bureaus: (name the bureau(s) here and identify the bureau/office information system from which the PII originated)and (how/why PII is collected from this source.).

4. *Other Federal Agencies*

- Other Federal agencies:** Agencies listed above.

5. *State and Local Agencies*

- State and local agencies: (Name the State and local agencies here and explain how/why PII is collected from this source).

6. *Private Sector*

- Private sector organizations (for example, banks and financial organizations, data brokers or other commercial sources): (Name the State and local agencies here and explain how/why PII is collected from this source.).

7. *Other Sources*

- Other sources not covered above (for example, foreign governments).
(Name the other sources here and explain how/why PII is collected from this source).

Section 3.3: Privacy and/or civil liberties risks related to collection

When Federal agencies request 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 [the individual], if any, of not providing all or any part of the requested information.” 5 U.S.C § 522a(e)(3). This is commonly called a Privacy Act Statement. The OMB Guidelines also note that subsection (e)(3) is applicable to both written and oral (i.e., interview) solicitations of personal information. Therefore, even if a federal employee or contractor has a fixed list of questions that they orally ask the individual in order to collect their information, this requirement applies.

Section 3.3(a) Collection Directly from the Individual to whom the PII pertains

1. None of the PII in the system was collected directly from an individual to whom it pertains. . *[Explain if the third-party/agency from which you obtained the PII actually collected the PII directly from the individuals about whom it pertains. Be prepared to discuss below how you ensure the information received from the third-party is still accurate, complete and timely for the purposes for which you will use it].* [Explanation here.]
2. Some or all of the information in this system was collected directly from an individual to whom it pertains.

Section 3.3(b) Privacy Act Statements

1. None of the PII in the system was collected directly from the individuals to whom it pertains. Therefore, a Privacy Act Statement is not required.
2. Some All of the PII in the system was collected directly from the individual to whom it pertains. Therefore, a Privacy Act Statement was posted at the point where the PII was collected directly from the individual. That Privacy Act Statement was provided to the individual on the form in which the [PII](#) was collected on a separate sheet of paper that the individual could retain; or in an audio recording or verbally at the point where the information was collected (e.g., on the phone) or other [please explain].
3. The Privacy Act Statement contained the following:
 - a. The authority (whether granted by statute, or by Executive order of the President) which authorizes the solicitation of the information.
 - b. Whether disclosure of such information is mandatory or voluntary.
 - c. The principal purpose or purposes for which the information is intended to be used.
 - d. The individuals or organizations outside of Treasury with whom the information may be/ will be shared.
 - e. The effects on the individual, if any, if they decide not to provide all or any part of the requested information.

Section 3.3(c) Use of Full Social Security Numbers

Treasury is committed to eliminating unnecessary collection, use, and display of full Social Security numbers (“SSN”) and redacting, truncating, and anonymizing SSNs in systems and documents to limit their accessibility to individuals who do not have a need to access the full SSN in order to perform their official duties. Moreover, 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 3.3(d) Justification of Social Security Numbers

1. N/A No full SSNs are maintained in the system or by the project. [*Explain if any portion of the SSN short of the full 9 digits is used in the system: Explain*]; *if the full SSN is located anywhere in the system (even if it is redacted, truncated or anonymized when viewed by users, please check number 2 below)*].
2. Full SSNs are maintained in the system or by the project and the following approved Treasury uses of SSNs apply:
 - security background investigations;
 - interfaces with external entities that require the SSN;
 - a legal/statutory basis (e.g. where collection is expressly required by statute);
 - when there is no reasonable, alternative means for meeting business requirements;
 - statistical and other research purposes;
 - delivery of government benefits, privileges, and services;
 - for law enforcement and intelligence purposes;
 - aging systems with technological limitations combined with funding limitations render impracticable system modifications or replacements to add privacy risk reduction tools (partial/truncated/redacted or masked SSNs); and
 - as a unique identifier for identity verification purposes.

Section 3.3(e) Controls implemented to limit access to and or improper disclosure of full Social Security Numbers

1. Full SSNs are ***not*** maintained in the system or by the project.
2. Full SSNs ***are*** maintained in the system or by the project and the following controls are put in place to reduce the risk that the SSN will be seen or used by someone who does not have a need to use the SSN in order to perform their official duties (*check ALL that apply*):
 - a. The entire SSN data field is capable of suppression (i.e., being turned off) and the data field is suppressed when the SSN is not required for particular system users to perform their official duties.
 - b. The SSN field is visible, but the SSN itself is blurred or distorted in some way so it is not capable of being read by users who do not require the SSN to perform their official duties.
 - c. Within the system, an alternative number (e.g., an Employee ID) is displayed to all system users who do not require the SSN to perform their official duties. The SSN is only linked to the alternative number within the system and when reporting outside the system (to an agency that requires the full SSN). The SSN is not visible to system users (other than administrators).
 - d. The SSN is truncated (i.e., shortened to the last 4 digits of the SSN) when displayed to all system users for whom the last four digits (but not the full) SSN are necessary to perform their official duties.

- e. Full or truncated SSNs are only downloaded to spreadsheets or other documents for sharing within the bureau or agency when disclosed to staff whose official duties require access to the full or truncated SSNs for the particular individuals to whom they pertain. No SSNs (full or truncated) are included in spreadsheets or documents unless required by each recipient to whom it is disclosed in order to perform their official duties (e.g., all recipients have a need to see the SSN for each employee in the spreadsheet).
- f. Other: [Please describe].

Section 3.3(f) Denial of rights, benefits, or privileges for refusing to disclose Social Security Number

- 1. N/A No SSNs are maintained in the system or by the project.
- 2. Full SSNs are collected, but no individual will be denied any right, benefit, or privilege provided by law if the individual refuses to disclose their SSN for use in the system or project. If the individual chooses not to provide their SSN *[please describe **here** what will happen (something less than denial of a privilege etc.) if the individual chooses not to provide their SSN]*.
- 3. Full SSNs are collected, and the individual will be denied the following right, benefit, or privilege provided by law if they refuse to disclose their SSN: *Applicants who refuse to provide their SSN are denied federal employment. 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. Denial of this right, benefit or privilege does not violate the law because: [choose one of the two boxes below]:*
 - a. SSN disclosure is required by the following Federal statute or Executive Order;
OR
 - b. The SSN is disclosed to a Federal, state, or local agency that maintains a system of records that was 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. *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.*

Section 3.3(g) Records describing how individuals exercise First Amendment rights

The Privacy Act requires 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).

- 1. N/A. The system or project does **not** maintain information describing how an individual exercises their rights guaranteed by the First Amendment. Information regarding the substance of a religious exemption (from vaccination requirements) sought by employees and onboarding personnel are not stored in HRConnect. That information is stored in the applicable EEO office or other appropriate location designated by non-Treasury users participating in vaccination status collection using HRConnect. For Treasury, the Office of Civil Rights and Diversity maintains this information in its Reasonable Accommodations Tracker. The PCLIA for this system can be found on the Treasury Departmental Offices Privacy and Civil Liberties Impact Assessments webpage at:

<https://home.treasury.gov/footer/privacy-act/privacy-and-civil-liberties-impact-assessments/do-pclia>

2. The system or project ***does*** maintain information describing how an individual exercises their rights guaranteed by the First Amendment. *If you checked this box, please check the box below that explains Treasury’s authorization for collecting this information:*
 - a. The individual about whom the information was collected or maintained expressly authorizes its collection/maintenance. The individual about whom the information was collected or maintained expressly authorized its collection by. *(for example, individuals may expressly authorize collection by requesting in writing that Treasury share information with a third party, e.g., their Congressman);*
 - b. The information maintained is pertinent to and within the scope of an authorized law enforcement activity because *[generally discuss here the nature and purpose of the information collected and the law enforcement activity];*
 - c. The following statute expressly authorizes its collection: *[provide here the name of and citation to the statute and the language from that statute that expressly authorizes collection] [your response MUST contain all three if you use a statute as the basis for the collection].*

Section 4: Maintenance, use, and sharing of the information

Section 4.1: Ensuring accuracy, completeness, and timeliness of information collected, maintained, and shared when it is used to make determinations about individuals

The Privacy Act and Treasury policy require that Treasury bureaus and offices take additional care when collecting and maintaining information about individuals when it will be used to make determinations about those individuals (e.g., whether they will receive a federal benefit). This includes collecting information directly from the individual where practicable and ensuring that the information is accurate, relevant, timely and complete to assure fairness to the individual when making a determination about them. This section addresses the controls/protections put in place to address these issues.

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 3.1 above), an agency may exempt the [system of records](#) (or a portion of the records) from this requirement. Exemptions may be found at the bottom of the relevant SORN next to the heading: “*Exemptions Claimed for this System.*”

Section 4.1(a). Exemption from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act

1. ***None*** of the information maintained in the system or by the project that is part of a system of records is exempt from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act. *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. System user are encouraged to keep their information accurate and up-to-date.*
2. All Some of the PII maintained in the system or by the project is part of a system of records and ***is*** exempt from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act. The exemption claimed for these records is appropriate because *[please*

see Appendix B which contains sample justifications for this exemption and provide the appropriate bases here [more than one bases may apply].

3. The PII maintained in the system or by the project is **not**: (a) part of a system of records as defined in section (e)(5) of the Privacy Act; or (b) used to make adverse determinations about individuals (defined in the Privacy Act as U.S. Citizens and legal permanent residents). Instead, the information is used to [describe how the information is used and why this use does not involve adverse determinations]. *hat you read the rest of the options before checking this box*
4. **None** of the information maintained in the system or by the project is part of a system of records as defined in section (e)(5) of the Privacy Act, but the information in the system **is** used to make adverse determinations about individuals (defined in the Privacy Act as U.S. Citizens and legal permanent residents). Despite the fact that the Privacy Act does not apply, the following protections are in place to ensure fairness to the individual: *explain here* .

Section 4.1(b) Protections in place despite exemption from the accuracy, relevance, timeliness, and completeness requirements

1. **None** of the information maintained in the system or by the project that is part of a system of records is exempt from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act.
2. For all information maintained in the system or by the project that is part of a system of records that is exempt from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act, the following efforts are made to ensure accuracy, relevance, timeliness, and completeness to the extent possible without interfering with the (check one) law enforcement intelligence other [describe here] mission requirements for which the system or project was created [choose **ALL** that apply]:
 - a. The exempt information is **not** actually used to make any adverse determinations about individuals.
 - b. The exempt information is **not** actually used to make any adverse determinations about individuals without additional research and investigation to ensure accuracy, relevance, timeliness, and completeness.
 - c. Individuals and organizations to whom PII from the system or project is disclosed (as authorized by the Privacy Act) determine its accuracy, relevance, timeliness, and completeness in a manner reasonable for their purposes before they use it to make adverse determinations about individuals.
 - d. Individuals about whom adverse determinations are made using PII from this system or project are given an opportunity to explain or modify their information (check one) before after the adverse determination is made. During this process, individuals are allowed to: [discuss here]
 - e. Other: (please describe):
3. No additional efforts are made to ensure accuracy, relevance, timeliness, and completeness to the extent possible because it would interfere with mission requirements.

Section 4.1(c) Collecting information directly from the individual when using it to make adverse determinations about them.

Section 552a(e)(2) of the Privacy Act requires that Federal agencies that maintain records in a system of records are required to collect information to the greatest extent practicable directly from the individual when the information about them may result in adverse determinations about their rights, benefits, and privileges under Federal programs. Agencies may exempt a system of records from this requirement under certain circumstances and if certain conditions are met.

1. The records maintained by this system or project are **not** used to make any adverse determinations about individuals.
2. The records maintained by this system or project **are** used to make adverse determinations about individuals **and** [check all that apply]:
 - a. These records **were** exempted from the Privacy Act provision that requires collection directly from the subject individual to the greatest extent practicable. Exemption of these records is proper because [explain here why the records were exempted; sample responses are provided in Appendix B of this template].
 - b. These records were **not** exempted from the requirement to collect information directly from the individual to the greatest extent practicable **and** [check the relevant box below and provide the information requested].
 - i. **All** records used to make an adverse determination are collected directly from the individual about whom the decision is made. *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).*

"Employees who fail to comply with a requirement to be fully vaccinated or provide proof of vaccination and have neither received an exception nor have an exception request under consideration, are in violation of a lawful order. Employees who violate this lawful order will be subject to discipline, up to and including removal."
 - ii. A **combination** of records collected from third parties **and** directly from the individual about whom the determination is made are used to make the determination because [please explain **here** why third-party data is required to make this determination; e.g., third-party data is required to verify the accuracy of the information provided by the individual seeking a privilege or benefit].
 - iii. **None** of the records used to make adverse determinations are collected directly from the individual about whom determinations are made because seeking the information directly from the individual might [select **ALL** that apply]:

- alert the individual to the fact that their conduct is being observed or investigated;
- cause the individual to alter or modify their activities to avoid detection;
- create risks to witnesses or other third parties if the individual is alerted to the fact that their conduct is being observed or investigated;
- Other: *(please describe here)*.

Section 4.1(d) Additional controls designed to ensure accuracy, completeness, timeliness and fairness to individuals in making adverse determinations

1. Administrative Controls. Individuals about whom information is collected are given the following opportunities to amend/correct/update their information to ensure it is accurate, timely and complete to the extent reasonably necessary to assure fairness when it is used to make a determination about them:

- a. The PII collected for use in the system or project is NOT used to make adverse determinations about an individual’s rights, benefits, and privileges under federal programs.
- b. The records maintained in the system or by the project are used to make adverse determinations and *(select one)* are are not exempt from the access provisions in the Privacy Act, 5 U.S.C. 552a(d).
- c. Treasury has published regulations in place describing how individuals may seek access to and amendment of their records under the [Privacy Act](#). *The [Treasury/bureaus FOIA and Privacy Act disclosure regulations](#) can be found at 31 C.F.R. Part I, Subtitle A, Subparts A and C. 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. For example, employees can update their vaccination status at any time.*
- d. Individuals who provide their information directly to Treasury for use in the system or by the project are provided notice of the adverse determination and an opportunity to amend/correct/update their information *[choose one]* before after it is used to make a final, adverse determination about them. This is accomplished by *[describe here how this process works and the protections in place, including redress/appeals processes; if notice is provided after an adverse determination is made, explain here why notice could not be provided before a determination was made, and the protections in place]*: Descriptions.
- e. Individuals who provide their information directly to Treasury for use in the system or by the project are expressly told at the point where the information is collected that they need to keep their information accurate, current and complete because it could be used to make adverse determinations about them. This is accomplished by:...
- f. All manual PII data entry by federal employees/contractors is verified by a supervisor or other data entry personnel before it is uploaded to the system (e.g., PII entered into the system from paper records is double-checked by someone else before it’s uploaded to the system). This is accomplished by: *[describe here how this process works]*.
- g. Other:

2. Technical controls. The system or project also includes additional technical controls to ensure that PII is maintained with such accuracy, relevance, timeliness and completeness as is reasonably necessary to assure fairness to the individual when it is used to make a determination about them. The following additional protections are relevant to this system or project

- a. No additional technical controls are available to ensure accuracy, relevance, timeliness and completeness.
- b. Automated data feeds are used to refresh/update the information in the system (where the system is reliant on updates from another system). These automated data feeds occur: [state here the frequency of updates] and [state here what happens when the data is updated and why the system is reliant on another system for its data].
- c. Technical and/or administrative controls put are in place to ensure that when information about an individual is acquired from multiple sources for maintenance in a single file about a particular individual, it all relates to the same individual . This is accomplished by: [describe here the method or process used to ensure that information merged about an individual from multiple sources for inclusion in a single file, all relates to the same person].
- d. Address verification and correction software (software that validates, updates and standardizes the postal addresses in a database).
- e. Other: *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.*

Section 4.2 Data-Mining

As required by Section 804 of the [Implementing Recommendation of the 9/11 Commission 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 Act and Data Mining reports available at: <http://www.treasury.gov/privacy/annual-reports>.

Section 4.2(a) Is the PII maintained in the system used to conduct data-mining?

1. The information maintained in this system or by this project ***is not*** used to conduct “data-mining” activities as that term is defined in the [9-11 Commission Act](#). Therefore, no privacy or civil liberties issues were identified in responding to this question.
2. The information maintained in this system or by this project ***is*** used to conduct “data-mining” activities as that term is defined in the [9-11 Commission Act](#). This system is included in Treasury’s annual report to Congress which can be found on the external Treasury privacy website.
3. The information maintained in this system or by this project ***is*** used to conduct “data-mining” activities as that term is defined in the [9-11 Commission Act](#), but this system is not included in Treasury’s annual report to Congress which can be found on the external Treasury privacy website. This system will be added to the next Treasury Data-mining report to Congress.

Section 4.3 Computer Matching

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

Pursuant to the CMPPA, 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 (the agency providing the records) and recipient agency (the agency that receives and uses the records to make determinations). The matching agreement describes the purpose and procedures of the matching **and** establishes protections for matching records.

Section 4.3(a) Records in the system used in a computer matching program

1. The PII maintained in the system or by the project ***is not*** part of a Privacy Act system of records.
2. The information maintained in the system or by the project ***is*** part of a Privacy Act system of records, but ***is not*** used as part of a matching program.
3. The information maintained in the system or by the project ***is*** part of a Privacy Act system of records and ***is*** used as part of a matching program. [*If whether a Matching Agreement was executed and published as required by the CMPPA/Privacy Act; if no Matching Agreement was executed, please explain here why*]: Explain here.

Section 4.3(b) Is there a matching agreement?

1. N/A
2. There is a matching agreement in place that contains the information required by Section (o) of the [Privacy Act](#).
3. There is a matching agreement in place, but it does not contain all of the information required by Section (o) of the [Privacy Act](#). The following actions are underway to amend the agreement to ensure that it is compliant.

Section 4.3(c) What procedures are followed before adverse action is taken against an individual who is the subject of a matching agreement search?

1. N/A
2. The bureau or office that owns the system or project conducted an assessment regarding the accuracy of the records that are used in the matching program and the following additional protections were put in place:
 - a. The results of that assessment were independently verified by [*explain how and by whom accuracy is independently verified; include the general activities involved in the verification process*].
 - b. Before any information subject to the matching agreement is used to suspend, terminate, reduce, or make a final denial of any financial assistance or payment under a Federal benefit program to an individual:
 - i. The individual receives notice and an opportunity to contest the findings; **OR**
 - ii. The Data Integrity Board approves the proposed action with respect to the financial assistance or payment in accordance with Section (p) of the [Privacy Act](#) before taking adverse action against the individual.
3. No assessment was made regarding the accuracy of the records that are used in the matching program.

Section 4.4: Information sharing with external (i.e., outside Treasury) organizations and individuals

Section 4.4(a) PII shared with/disclosed to agencies, organizations or individuals outside Treasury

1. PII maintained in the system or by the project is ***not*** shared with agencies, organizations, or individuals external to Treasury.
2. PII maintained in the system or by the project ***is*** shared with the following agencies, organizations, or individuals external to 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 below. 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).

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)*

With respect to vaccination status information, Treasury may disclose that information externally for any of the purposes allowed by the Privacy Act, including the routine uses listed in the applicable SORN, Treasury .020, Health Screening and Contact Tracing Records, Fed. Reg. Vol. 86, No. 35, at 11381. Non-Treasury users participating in vaccination status collection using HRConnect may disclose vaccination status as allowed by the Privacy Act, including the routine uses stated in OPM/GOVT-10, Employee Medical File System Records. Available at:

<https://www.govinfo.gov/content/pkg/FR-2010-06-21/pdf/2010-14838.pdf> Some HRConnect users may rely on their own SORN and the applicable routine uses stated in that document. Employees of Non-Treasury users participating in vaccination status collection using HRConnect should consult their

agency's online privacy page and/or consult with their privacy officer for specific/additional information.

3. All external disclosures **are** authorized by the Privacy Act (including routine uses in the applicable SORN). [Vaccination status information is Confidential Medical Information under the Rehabilitation Act. Treasury will, therefore, segregate it from other personnel records and access will be limited based on need to know.](#)

Section 4.4(b) Accounting of Disclosures

An accounting of disclosures is a log of all external (outside Treasury) disclosures of records made from a system of records that has **not** been exempted from this accounting requirement. This log must either be maintained regularly or be capable of assembly in a reasonable amount of time after an individual makes a request. Certain system of records may be exempted from releasing an accounting of disclosures (e.g., in law enforcement investigations).

Section 4.4(c) Making the Accounting of Disclosures Available

1. The records are not maintained in a system of records subject to the Privacy Act so an accounting is **not** required.
2. No external disclosures are made from the system.
3. The Privacy Act system of records maintained in the system or by the project **is** exempt from the requirement to make the accounting available to the individual named in the record. Exemption from this requirement was claimed because: [please state here why the records in this system of records were exempted from this requirement].
4. The Privacy Act system of records maintained in the system or by the project **is not** exempt from the requirement to make the accounting available to the individual named in the record and a log is maintained regularly. The log is maintained for at least five years and includes 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.
5. The Privacy Act system of records maintained in the system or by the project **is not** exempt from the requirement to make the accounting available to the individual named in the record and a log is **not** maintained regularly, but is capable of being constructed in a reasonable amount of time upon request. The information necessary to reconstruct the log (i.e., date, nature, and purpose of each disclosure) is maintained for at least five years.

Section 4.4(d) Obtaining Consent Prior to New Disclosures Not Authorized by the Privacy Act

Records in a system of records subject to the Privacy Act may not be disclosed by "any means of communication to any person or to another agency" without the prior written request or consent of the individuals to whom the records pertain. 5 U.S.C. Sec. 552a(b). However, the Act also sets forth twelve exceptions to this general restriction. These 12 exceptions may be viewed at: <https://www.justice.gov/usam/eousa-resource-manual-139-routine-uses-and-exemptions>. Unless one of these 12 exceptions applies, the individual to whom a record pertains must provide their consent, where feasible and appropriate, before their records may be disclosed to anyone who is not listed in one of the 12 exceptions. One of these 12 exceptions also allows agencies to include

in a notice published in the Federal Register, a list of routine uses. Routines uses are disclosures outside the agency that are compatible with the purpose for which the records were collected.

Section 4.4(e) Obtaining Prior Written Consent

1. The records maintained in the system of records are only shared in a manner consistent with one of the 12 exceptions in the Privacy Act, including the routine uses published in the Federal Register.
2. If a situation arises where disclosure (written, oral, electronic, or mechanical) must be made to anyone outside of Treasury who is not listed in one of the 12 exceptions in the Privacy Act (including the published routine uses), the individual's prior written consent will be obtained where feasible and appropriate. [Vaccination status information is Confidential Medical Information under the Rehabilitation Act. Treasury will, therefore, segregate it from other personnel records and access will be limited based on need to know.](#) *Employees of Non-Treasury users participating in vaccination status collection using HRConnect should consult their agency's online privacy page and/or consult with their privacy officer for specific/additional information.*

Section 5: 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 5.1: 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 also 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).

Section 5.1(a)

1. The system or project maintains information obtained from individuals and organizations who are not federal personnel or an agency of the federal government (i.e., outside the federal government)
2. The project or system involves a new collection of [information in identifiable form](#) for 10 or more persons from outside the federal government.
3. The project or system completed an Information Collection Request ("ICR") and received OMB approval.
4. The project or system did not complete an Information Collection Request ("ICR") and receive OMB approval because *the information contained in this system is being gathered from individuals who have been offered employment with the Federal government, in their capacity as Federal employees, and from current Federal employees. Following an offer of employment, they are no longer considered members of the public, and as such, the Paperwork Reduction Act does not apply.*

Section 5.2: 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 National Archives and Records Administration (NARA) for permanent retention upon expiration of this period. If the system has an applicable SORN(s), check the “Policies and Practices for Retention and Disposal of Records” section.

Section 5.2(a)

1. The records used in the system or by the project are covered by a NARA’s *Treasury retains Human Resources records in this system in compliance with General Records Schedule (GRS) 2.0, approved by the National Archives and Records Administration (NARA). NARA is in the process of updating GRS 2.7 to include employee vaccine records. NARA has not yet approved that records schedule. Treasury will treat vaccination records as unclassified records and retain permanently until GRS 2.7 is approved. After GRS 2.7 is approved, GRS 2.7 will govern the disposal of Treasury vaccination records.*
2. The records used in the system or by the project are covered by a NARA approved Treasury bureau Specific Records Schedule (SRS). The SRS *[please provide here the specific schedule name and identifying number]*
3. On *[please state the date on which NARA approval was sought]* the system owner sought approval from NARA for an SRS and is awaiting a response from NARA. *[State here the retention periods you proposed to NARA].*
4. The system owner is still in the process of developing a new records schedule to submit to NARA.

Section 5.3: 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).

Section 5.3(a)

1. The system is a federal information system subject to FISMA requirements.
2. The system last completed an SA&A and received an ATO on: *01/31/2020.*
3. This is a new system has not yet been authorized to operate. The expected to date for receiving ATO is *[please state here the expected date on which you expect authorization will be granted].*
4. The system or project maintains access controls to ensure that access to PII maintained is limited to individuals who have a need to know the information in order to perform their official Treasury duties. *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.*
5. All Treasury/bureau security requirements are met when disclosing and transferring information (e.g., bulk transfer, direct access by recipient, portable disk, paper) from the Treasury system or project 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, and HRConnect Program Office. The agencies 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).

6. This system or project maintains an audit log of system users to ensure they do not violate the system and/or Treasury/bureau rules of behavior.
7. This system or project has the capability to identify, locate, and monitor individuals or groups of people other than the monitoring of system users to ensure that they do not violate the system's rules of behavior. *[If checked, please describe this capability here, including safeguards put in place to ensure the protection of privacy and civil liberties.]*

Section 5.4: 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.

Section 5.4(a)

1. The project or system will ***not*** 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)?
2. The project or system ***will*** 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)? *If checked:*
3. The system or project complies 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.
4. The system or project is not in compliance with all [Section 508](#) requirements. The following actions are in progress to ensure compliance: [please describe here the efforts underway to ensure compliance].

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:

Ryan Law
Deputy Assistant Secretary for Privacy, Transparency, & Records
Departmental Offices
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.
Geographic Rate Adjustment	Amount of money/salary adjusted for geographic location.

Data Point(s)	Description
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.

Data Point(s)	Description
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

Position/Requisition Data (details of the posting, per posting)	
Data Point	Description
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
Applicant Data (per position)	
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
Applicant Demographic Data (aggregated count per posting and separate from individual applicant data)	
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

Response Data (aggregated at the agency, office and organizational level)	
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)

Response Data (aggregated narrative themes)	
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

Contact Data (Facilitate Participation in Listening Sessions)	
Name	Business Email
Title	Business Phone
Office location (NY/DC)	
Feedback Data (Aggregated and/or de-identified)	
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