DEPARTMENT OF TREASURY
Washington, D.C. 20220

Entry on Duty System 2.0 (EODS 2.0)
Privacy Impact Assessment (PIA)

October
2016

Version 1.0

System Information

System Name: Entry on Duty System 2.0 (EODS 2.0)
OMB Unique Identifier: 015-00-01-13-01-1261-24
System Host: Amazon

System Application/General Information

1. **Does this system contain any information in identifiable form?**

   Yes

2. **What is the purpose of the system/application?**

   The Entrance on Duty System (EODS) is a two-component, web-based Human Resource (HR) product that facilitates the completion of new hire forms via an automated online process as a part of the HR Connect Line of Business. EODS resides in Treasury's Workplace.gov Community Cloud (WC2) segregated federal cloud platform, a government managed solution that utilizes the Amazon Web Services (AWS) Infrastructure as a Service (IaaS). Both are FedRAMP compliant offerings that have gone through a rigorous acceptance process. The WC2 platform provides data separation from Amazon by encrypting data both at rest and in transit. Amazon resources/personnel will have no visibility of the data processed by the WC2 platform and EODS application.

   The first EODS component, called CareerLauncher, is a user-friendly website available to the public, including job applicants. The website provides content regarding Federal employment but also includes a variety of information introducing the specific agency or bureau as an attractive place to work and build a career.

   The second component of EODS is the CareerOrientation (the "private site") tool which is an online data collection tool that allows new hires to submit their onboarding information at their convenience, 24/7, from anywhere that has internet access. This minimizes the time between an applicant accepting a job (aka a "prehire"), and the day he or she actually begins work. Candidates who accept job offers are provided login credentials that allow them to access the system. The site also allows HR practitioners to monitor, review, and approve new hire data completion.

3. **What legal authority authorizes the purchase or development of this system/application?**

   5 U.S.C. 301, Department regulations for the operations of the department, conduct of employees, distribution and performance of its business, the custody, use, and preservation of its records, papers, and property.

31 U.S.C. 321, General authorities for the Secretary establishes the mission of the Department of Treasury.

e-Government Act of 2002 (H.R. 2458/S.803) supports government to government services. http://www.whitehouse.gov/sites/default/files/omb/assets/omb/egov/g-4-act.html

4. **Under which Privacy Act System of Records Notice (SORN) does the system operate? (Provide the system name and unique system identifier.)**

   System Name: Entry on Duty System 2.0 (EODS)
   Unique System Identifier: 015-00-01-13-01-1261-24

   SORN: Treasury .001--Treasury Payroll and Personnel System: http://www.treasury.gov/FOIA/Documents/treasurypa.pdf

   Also the OPM/GOVT-1 "General Personnel Records" SORN 61 July 15, 1996 Fed. Reg. 36919, which covers ALL the federal HR Lines of Business (LoB) IT initiatives: http://www.gpo.gov/fdsys/pkg/FR-2006-06-19/html/06-5459.htm

Data in the System

1. **What categories of individuals are covered in the system?**

The categories of individuals consist of potential applicants who may become new employees, former Federal employees, and current Federal employees who seek government employment.

2. **What are the sources of the information in the system?**

   a. **Is the source of the information the individual or is it taken from another source? If not directly from the individual, then what other source?**

      Information concerning candidates and employees in the system is collected from the individual or HR Specialist via electronic forms. Position description number is transferred from HR Connect to EODS upon automated request.

   b. **What Federal agencies are providing data for use in the system?**

      At this time, no Federal agencies will be providing data for use in the system. Only Treasury's own HR Connect system will provide data (position description number) into the Treasury EODS system. As an IT system under the Treasury HR LoB, EODS provides services for Treasury's bureaus and external customers. Here is the May 2014 EODS 1.0 Federal Agency customer base:
      1. Alcohol, Tobacco, Firearms & Explosives
      2. United States Agency for International Development
      3. Bureau of Census
      4. Treasury Bureaus:

      a. Departmental Offices
      b. The Alcohol & Tobacco Tax & Trade Bureau
      c. Treasury Inspector General for Tax Administration
      d. Financial Crimes Enforcement Network.

c. **What State and/or local agencies are providing data for use in the system?**

None.

d. **From what other third party sources will data be collected?**

EODS receives limited applicant data from Treasury's recruiting tool, the Career Connector application.

e. **What information will be collected from the employee and the public?**

Applicants who receive and accept job offers for employment with a Federal agency that uses EODs submit the information via online data entry. This collected data is populated, electronically signed and released to the HR Specialist using the forms listed below that are required to complete the hiring/onboarding process:

- AD- 349 Employee Address
- All fifty plus state tax forms
- D4A – DC Tax Waiver
- DG 60 FEHB Premium Conversion Waiver
- DS5002 - Foreign Service Designation of Beneficiary Form
- I-9 Employment Eligibility Verification Data form
- OF-306 Declaration for Federal Employment
- OGE-278e Executive Branch Personnel Public Financial Disclosure Report
- OGE 450 Confidential Financial Disclosure
- PIV Applicant Information
- SF-50 Notification of Personnel Action
- SF-61 Appointment Affidavit/Oath of Office
- SF-144 Statement of Prior Federal Service
- SF-181 Ethnicity and Race Identification
- SF-256 Self Identification of Disability
- SF-1152 Designation of Beneficiary Unpaid Compensation
- SF-1199A Direct Deposit
- SF-2808 Designation of Beneficiary – Civil Service Retirement System (CSRS)
- SF-2809, Health Benefits Election Form
- SF-2817 FEGLI Life Insurance Election
- SF-2823 FEGLI Designation of Beneficiary

- SF-3109 Federal Employees Retirement System (FERS) Election of Coverage
- SF-3102 Designation of Beneficiary – Federal Employees Retirement System (FERS)
- TSP1 Thrift Savings Plan Election
- TSP1-C Thrift Savings Plan Catch-Up
- TSP3 Designation of Beneficiary – Thrift Savings Plan (TSP)
- TSP-19 Transfer
- W4 Federal Withholding

These forms require individuals to submit personally identifiable information (PII) [1] to EODs through the Private Site. The data contained in the EODS system primarily consists of information relating to hiring activities, including information relating to individuals' employment, compensation, benefits, and retirement. This data is PII, and includes the following data types of information:

- Personal Identifiable Data
- 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
- Beneficiary & Dependent Data
- Health Benefit Data

PII is any information that can be used to distinguish or trace an individual's identity and any other information that is linked or linkable to an individual (such as medical, educational, financial, and employment information). The sensitivity of data exchanged between systems must be protected as required by the Privacy Act of 1974, as amended, 5 U.S.C. 552a (PL 93-579) [2].

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[1] As used in this document "Personally Identifiable Information (PII) means, any information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of this term also incorporates by reference the definition of PII in OMB Memorandum 06-19 [1] and the definition of term "Information in Identifiable Form" as defined in § 208(d) [1] of the E-Government Act of 2002, Pub. L.107-347, 116 Stat. 2899 and as further defined in OMB M 03-22. [1]

[2] PII is not limited to personal information being maintained in a Privacy Act system of records. Accidental or willful disclosure of privacy information to unauthorized individuals is a violation of the Privacy Act and carries significant penalties.

The table below is a complete list of EODS forms and the all PII data elements associated with each form.

Form ID	Form Name	
General Onboarding Forms		
Declaration for Federal Employment		
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		
Appointment Affidavit		
SF-61	**Appointment Affidavit**	**All Data Elements in SF-61 pertain to the Applicant**
Applicant Name	Notary Public Commission Seal information	
Statement of Prior Federal Service		
SF-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
Ethnicity and Race Identification		
SF-181	**Ethnicity and Race Identification**	**All Data Elements in SF-181pertain to the Applicant**
Applicant Name	Social Security Number	Date of Birth
Ethnicity/Race		
Self-Identification of Disability		

Form ID	Form Name	
SF-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
Immigration & Naturalization Service Employment Eligibility Verification		
INS-9	**Immigration & Naturalization Service Employment Eligibility Verification**	**Data Elements in INS-9 pertain to the Applicant and Preparer and or Translator**
Applicant Last Name, (Family Name), First Name (Given Name), Middle initial, Other Names Used (if any)	Applicant Email address	Applicant Foreign Passport Number
Applicant Address	Applicant Telephone Number	Applicant Country of Issuance
Applicant Date of Birth	Applicant Citizenship	Preparers and or Translator Last Name (Family Name), First Name (Given Name) Address
Applicant Social Security Number	Applicant Alien Registration Number/USCIS Number or form I-94 Admission Number	
***Form not supported by the EOD system**		
**SF-312	**Classified Information Non-Disclosure Agreement**	
Direct Deposit Sign-up		
SF-1199A	**Direct Deposit Sign-Up**	**Data Elements in SF-1199A pertain to the Applicant and Joint Payee and Join 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
Applicant Telephone number	Payee/Joint Payee Certification require Signature	Type of Depositor Account Checking or Savings
***Form not supported by the EOD system**		
**FMS-2231	**Fast Start Direct Deposit**	
FERS Election of Coverage		
SF-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 Data of Birth

Form ID	Form Name	
Applicant Marital Status	Applicant Former Spouse's Full Name if OPM form 1556 is included as an attachment	
Designation of Beneficiary (CSRS)		
SF-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 (FEGLI)		
SF-2823	**Designation of Beneficiary (FEGLI)**	**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)		
SF-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		
SF-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

Form ID	Form Name	
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**
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		
Employee Election Form		
TSP-1	**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		
TSP Catch-Up Contribution Form		
TSP-1-C	**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		
Premium Conversion Waiver/Election		
DG-60	**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	
Life/Health Insurance/Benefits		
SF-2809	**Employee Health Benefit Election (FEHB)**	**Data Elements in SF-2809 pertain to the Applicant and Eligible family member/s**

Form ID	Form Name	
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		

Life Insurance Election (FEGLI)

SF-2817	**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	OWCP	

Withholding Allowances/Exemption Certificate

W4	**Employee Withholding Allowance**	**All Data Elements in W4 pertain to the Applicant**
Name First, Middle initial, Last Name	Home Address	Marital Status
	Employee Address	
AD-349	Employee address	All Data Elements in W4 pertain to the Applicant
Name Last, First, Middle	Social Security Number	Employee Home Address
Employee Mailing Address	Signature of Employee	

Employment Eligibility Verification

I-9	**Employment Eligibility Verification**	**Not All Data Elements in form pertain to the Applicant**
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

Form ID	Form Name	
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		
SF-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

Form ID	Form Name	
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		
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

Form ID	Form Name	
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. **Accuracy, Timelines, and Reliability**

   1. **How will data collected from sources other than bureau records be verified for accuracy?**

      Data is collected directly from the individual or entered by an HR Specialist. Accuracy is verified by both the individual upon submission into the EODS (via the Private Site) and the HR Specialist. Information is manually entered by the HR Specialist when the prehire account is created/finalized and after the prehire submits their data during the HR Review process. During the HR Review process, the HR Specialist enters HR or agency specific data that is part of the hiring process and if the prehire did not provide ethnicity and disability information, the HR Specialist has the ability to respond on behalf of the Prehire as required by OPM. HR Specialists are trained to follow standard operating procedures (SOPs) for verifying all information manually input into the system before saving.

      The prehire has the opportunity within EODS to review and make updates to the information they provided prior to certifying and submitting their data. The employee also has opportunities during employment to update the information provided during the pre-employment stage. PII provided to EODs by HR Connect is trusted because it is also collected directly from the individual and by HR Specialists following SOPs for verifying information input manually into the system as well as provided to the employee to review and modify as necessary prior to certifying and submitting.

2. **How will data be checked for completeness?**

   Data is checked for completeness by system edits that can be initiated by the individual, and the HR Specialist. During the HR review process, the HR Specialist is responsible for ensuring all the appropriate hiring information has been collected from the prehire.

3. **Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models.)**

   Data is current as of the date it is collected. Data verification is conducted by the employee or applicant and the HR specialist. The employee can provide updated information as necessary throughout his or her employment.

4. **Are the data elements described in detail and documented? If yes, what is the name of the document?**

   Yes, all data elements pertaining to EODS have been detailed and documented. The documents include; EODS Requirements Specifications Document, Data Dictionary, EODS Supplementary Requirements, Technical Design Document, and other design documentation.

Attributes of the Data

1. **Is the use of the data both relevant and necessary to the purpose for which the system is being designated?**

   The information contain in EODs is both relevant and necessary to the onboarding of new employees. On the issue of relevance, OPM maintains a "Forms Management Program" by which it establishes policies and procedures for new federal employees. This program also outlines the responsibilities for reviewing and approving form contents, including the questions asked and the anticipated information to be returned. According to OPM's website, "OPM forms satisfy a valid need; essential to accomplish a mission and necessary for the efficient and economical operation of the Office of Personnel Management."

2. **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

   No, the system will not derive or aggregate any new data about the individual from the data entered by the individual applicant. Any data maintained in EODS will be protected pursuant to applicable federal security requirements[3].

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[3] Federal Information Security Management Act of 2002 (FISMA) P.L. 107-347 (Title III of the E-Government Act of 2002)

3. **Will the newly aggregated data be placed in the individual's record?**

    Not applicable, since no new data is derived about the individual applicant.

4. **Can the system make determinations about employees/public that would not be possible without the new data?**

    No, the system does not derive new data or create previously unavailable data about an individual through aggregation from the information collected. The system itself does not have the capability to make determinations about prospective employees or the public. The information provided by the prehire (as opposed to newly created or derivative information) might, however, affect eligibility for particular benefits. For example, if the prehire submits an incorrect bank account number for purposes of direct deposit of their paycheck into their financial institution, deposits will not be made until the employee provides the correct information.

5. **How will the new data be verified for relevance and accuracy?**

    The system does not derive new data or create previously unavailable data about an individual.

6. **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

    The information is consolidated in EODS only with other information (as collected in the various forms) related to the prospective employee. All system data is protected as required by the Privacy Act of 1974 and Federal Information Security Management Act (FISMA) security controls, including encryption at rest and in transit, configuration management controls, and role-based access controls. Role-based access controls restrict permission to access the system on a "need-to-know" basis. This means that privileges to access the system are only provided to individuals, personnel or contractors where they have a need to access information in the system to perform official government functions that are within the scope of their individual duties. The designated security categorization for EODS2.0 is a Moderate level system, based on an assessment conducted as dictated by FIPS 200; Minimum Security Controls for Federal IT Systems and NIST 800-53 revision 4. The assessment results provide the criteria (Moderate Baseline) for the selection of security controls that are outlined NIST 800-53 revision 4 and additional security control safeguards outlined in Treasury Security Manual (TD P) 85-01.

7. **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

    See answer to previous question (#6)

8. **How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

   Yes, data is retrievable by personal identifier (system generated employee identification number) and the applicant's/employee's name.

9. **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

   Two reports can be generated based on data from EODS: 1) EODS Report; and 2) New Hire Benefits Report. The EODS Report provides the list of prehires on-boarding employees with the same EOD date to notify HR Specialists with access to EODS of employees' impending arrival. The New Hire Benefits Report provides summary information on new hires' benefits elections.   These reports are only accessible to HR specialists who have a need to know this information in order to perform their official functions.

Maintenance and Administrative Controls

1. **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

   EODS is hosted on the Treasury Workplace.gov Community Cloud (WC2) at Amazon Web/Cloud Services (AWS). As part of the hosted services, a data synchronization tool keeps data in synch between primary and backup sites for Disaster Recovery (DR) purposes and data consistency.

2. **What are the retention periods of data in this system?**

   Prehire data is retained in the system for 90 days before being purged from EODS (see Question 3 below for a more detailed description of this process). The retention periods for data contained in this system are covered by General Records Schedules #1, Civilian Personnel Records and have various retention periods for specific types of data. The system complies with the Department of Treasury *Directive 80-50 (TD 80-50) Records and Information Management Manual*. In accordance with TD 80-50, records are not destroyed or otherwise alienated from the system except in accordance with procedures prescribed in 36 Code of Federal Regulation (CFR), Part 1228 - Disposition of Federal Records.

3. **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

   The database of obsolete applicants is purged after 90 days by the system.

   Reports can be generated on an as needed basis by the HR Specialists. Those reports can be saved to an individual HR Specialist's machine. Since applicant data is removed, no reports are available on those applicants. Data kept separately by HR Specialists fall under default retention periods for HR data and individual Bureau, Agency or Department policy.

Annual Cyber Security Awareness Training and Annual Privacy Awareness Training are provided to all federal users and contractors that support the EODS application instructing them to dispose of sensitive data properly. The procedures for eliminating the prehire records at the end of the retention period adhere to the Federal Records Act of 1950 and National Archives and Records Administration guidelines, in addition to the Treasury Information Systems Life Cycle (ISLC) management requirements and OMB Memorandum M-06-16 *Protection of Sensitive Agency Information.*

4. **Is the system using technologies in ways that the bureau/office has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

   EODS does not use any technologies in ways that have not been previously employed. Career Launcher is built upon a proven web-based Commercial Off-The-Shelf product, Microsoft's SharePoint 2013. Career Orientation is built using the Microsoft.NET Framework technology that has a well established reputation. However, EODS has moved from a federally hosted system to the new Treasury cloud WC2 platform.

5. **How does the use of this technology affect public/employee privacy?**

   The technology has the potential to affect privacy, but the supported technology will provide a layered protection defense through role-based access controls (RBAC), least privilege, separation of duties, auditing, periodic security control testing, configuration management, actively reviewing system changes and data encryption for sensitive data.

6. **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

   EODS does provide the capability to identify an employee via the employee identifier (person's name) for the new hire to gain access to the system, and for support by HR Specialists. It also provides the capability to authenticate an individual to ensure that only authorized individuals are utilizing the system. The monitoring capabilities provide "up front" situational awareness and enhances IT asset protection to avoid system, PII or other data compromise. Additionally, EODS includes system performance and security monitoring tools to ensure the system is operating effectively and security.

7. **What kinds of information are collected as a function of the monitoring of individuals?**

   EODS collects ID, time, date, successful and failed login attempts for both privileged and non-privileged users.

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

   EODS has built-in security checks in order to ensure that privacy safeguards are not abused or bypassed. For instance, access profiles are used to enable an individual to access their own information but will permit administrators to monitor any individual that engages in any unauthorized or malicious behavior within the EODS environment. In addition, before users' complete registration they must accept the system Rules of Behavior. To ensure real

time monitoring coverage in order to prevent unauthorized access, a layered and structured hierarchy of assets are proactively monitored. These assets include network, operating system and the EODS application

9. **Under which Privacy Act SORN does the system operate? Provide number and name.**

   Treasury .001--Treasury Personnel and Payroll System;
   http://www.treasury.gov/FOIA/Documents/treasurypa.pdf
   [Federal Register: September 28, 2006 (Volume 71, Number 188)] [Notices] [Page 57021-57022]
   From the Federal Register Online via GPO Access [wais.access.gpo.gov]
   [DOCID:fr28se06-104]

   "Per OPM EOD guidance, Federal EOD systems used to furnish information that resides on Personnel Forms are covered under the GOVT-1 System of Record Notice (SORN) (http://archive.opm.gov/fedregis/2006/71-061906-35363-a.htm)".
   This SORN addresses the EODS system capabilities and objectives.

10. **If the system is being modified, will the Privacy Act SORN require amendment or revision? Explain.**

    EODS 2.0 is a modification of an existing system, and these functions are covered in the existing SORN and do not constitute a significant change that would require an amended SORN.

Access to Data

1. **Who will have access to the data in the system? (e.g., contractors, users, managers, system administrators, developers, others.)**

   a. Prehire (public)
   b. Employee
   c. HR Specialist
   d. Application Administrator
   e. Application Database Administrator
   f. WC2 Database Administrator
   g. WC2 Network Administrator

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

   Access to the data by a user is based upon the user profile that is determined under the strict "need-to-know" criteria and also limited by the scope of prehire, employee and contactor duties. The criteria, procedures, controls, and responsibilities regarding access are documented in the System Security Plan. The Department of the Treasury IT Security Program Directive 85-01 (TD P 85-01) clearly documents that the system manager/owner is

responsible for ensuring that access to the information and data is restricted to authorized personnel on a need-to-know basis.

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

   Access will be restricted through role-based access controls. Users will only have access to their own PII. In the case of HR Specialists, they will only have access to the information that is specifically under their direct ownership or strict "need-to-know" access controls as well as, their own PII.

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

   EODS data centers and support organization offices are restricted to those employees who require access. Role-based system access also prevents misuse. Disclosure of information through IT assets is restricted through the use of passwords and sign-on protocols, which are changed at predetermined intervals. All users are required to accept the rules of behavior each time they log into EODS.

   Individuals with an established "need-to-know" may only access their own data. This limited access is controlled by the system security mechanisms that are outlined in the National Institute of Standards and Technology 800-53 and the EODS system security plan.

5. **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other statutory and regulatory measures addressed?**

   For the design and development of EODS, contractors were utilized. Contractors also provide operations and maintenance services. Privacy Act contract clauses were inserted into their contracts per Federal Acquisitions Regulation - FAR[4] 48 CFR.24.102(a) and Treasury Acquisition Regulation 48 CFR.

6. **Do other systems share data or have access to the data in the system? If yes, explain.**

   Treasury EODS provides PII for new hires to the Treasury HR Connect application, another system within the HR LoB; HR Connect is the system of record for the EODS data. HR Connect provides EODS prehire data that was provided to HR Connect through a recruiting tool as well as position data. Position data contains the job code, salary grade, title and other attributes that drive how the employee filling that position will be compensated or receives benefits. Position data is defined in HR Connect and linked to a prehire in EODS.

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[4] Federal Acquisition Regulations (FAR)

7. **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

   All users/applicants are responsible for data protection as outlined in the EODS Rules of Behavior (RoB); however the information owner, and ultimately the System Owner and Authorizing Official have the responsibility to see that the data is protected from all threats.

8. **Will other agencies share data or have access to the data in this system (e.g. Federal, State, Local, and Others)?**

   EODS does not share data with other Agencies.

9. **How will the data be used by the other agency?**

   This question is not applicable, since EODS data is not shared with other Agencies.

10. **Who is responsible for assuring proper use of the data?**

    The EODS Authorizing Official (AO), the Treasury Associate CIO, is accountable for EODS security. Data providers are responsible for assuring proper use of the data through various agreements and statutory mandates [i.e., the Privacy Act]. The individual applicants, as data providers, are responsible to ensure the data entered is correct.