

PRIVACY IMPACT ASSESSMENT

Please submit your responses to your Liaison Privacy Official

http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf.

If you need further assistance contact Marlyn Aguilar, at aguilar.marlyn@epa.gov or (202) 566-0012.

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| System Name: PeoplePlus (PPL) | | |
| Preparer: Dennis W. Nachtrieb, Esq. | Office: OCFO/OTS/IMSD | |
| Date: 09.25.18 | Phone: 919.541.5606 | |
| Reason for Submittal: New PIA ____ Revised PIA ____ Annual Review <u>X</u> Rescindment ____ | | |
| This system is in the following life cycle stage(s): | | |
| Definition <input type="checkbox"/> | Development/Acquisition <input type="checkbox"/> | Implementation <input type="checkbox"/> |
| Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/> | | |
| <p>Note: Note: New and Existing Systems require a PIA annually, when there is a significant modification to the system or where privacy risk has increased to the system. For examples of significant modifications, see <u>OMB Circular A-130, Appendix 1, Section (c) (1) (a-f)</u>.</p> <p>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u>OMB Circular No. A-123, Section VII (A) (pgs. 44-45)</u>.</p> | | |

Provide a general description/overview of the system:

PeoplePlus (PPL) supports the EPA’s Office of the Chief Financial Officer (OCFO) in the timely and accurate completion of employee Time and Attendance (T&A) to be used for the completion of payroll payments by the EPA’s payroll provider and for the submission of employee absence requests.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the system in question? 5 U.S.C. 5101 et seq.; 5 U.S.C. 5501 et seq.; 5 U.S.C. 5525 et seq.; 5 U.S.C. 5701 et

seq.; 5 U.S.C. 6301 et seq.; 31 U.S.C. 3512; Executive Order 9397 (Nov. 22, 1943); 5 U.S.C. 6362; 5 U.S.C. 6311.

- 1.2 Has a system security plan been completed for the information system(s) supporting the system? *Yes***
- 1.3 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

No ICR required.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

- 2.1 Identify the information the system collects, uses, disseminates, or maintains (e.g., data elements, including name, address, DOB, SSN).**

PPL collects the following: Elements (Hours/Time Reporting Code/Work Code) associated with bi-weekly time and attendance, as well as, elements (Start-End Dates/Leave Category/Absence Type/Duration) associated with the submission of absence requests for various types of leave. Besides the information PPL collects, PPL contains employee: Names, SSNs, EINs, Financial, DOBs, Addresses, Work Telephone #s, Employee IDs

- 2.2 What are the sources of the information and how is the information collected for the system? *The origin of the information comes directly from the employee. The information that PPL collects is entered directly into PPL by the employee. The information that PPL contains that is not entered directly by the employee is downloaded from EPA's payroll provider.***
- 2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used. *No***

2.4 Discuss how accuracy of the data is ensured. *PPL validates the information that the employee enters/selects as well as the information downloaded from EPA's payroll provider.*

2.5 Privacy Impact Analysis: Related to Characterization of the Information
Privacy Risk: *That the privacy information that is downloaded from EPA's payroll provider is compromised.*

Mitigation: *Server encryption, network firewalls, multi-factor user access, security background checks of individuals who have system access to the PII.*

Section 3.0 Uses of the Information

The following questions require a clear description of the system's use of information.

- 3.1 Describe how and why the system uses the information.** *PPL uses the information it contains to ensure that EPA employees are paid in a timely and accurate manner and to track employee absences.*
- 3.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes X No . If yes, what identifier(s) will be used.** *(A personal identifier is a name, social security number or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual. Or any identifier that can be linked or is linkable to an individual.) EPA Network User ID and Employee ID*
- 3.3 If the system retrieves information by personal identifier, what types/elements of information about the user are being retrieved?** *Names, SSNs, EINs, Financial, DOBs, Addresses, Work Telephone #s, Employee IDs*
- 3.4 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?** *EPA-1*
- 3.5 Does the system use technology to conduct electronic searches,**

queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how EPA plans to use such results. *No*

3.6 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: *That the privacy information that is downloaded from EPA's payroll provider is compromised.*

Mitigation: *Server encryption, network firewalls, multi-factor user access, security background checks of individuals who have system access to the PII.*

Section 4.0 Notice

The following questions seek information about the system's notice to the individual about the information collected, the right to consent to uses of information, and the right to decline to provide information.

4.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Any individual who wants to know whether this system of records contains a record about him or her, who wants access to his or her record, or who wants to contest the contents of a record, should make a written request to the EPA e, Attn: Privacy Officer, MC 2831T, 1200 Pennsylvania Avenue NW., Washington, DC 20460.

4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the collection or sharing of their information?

The SORN (EPA-1) documents how the individual is able to access their records. From EPA-1: Individuals seeking access to information in this system of records about themselves are required to provide adequate identification (e.g. driver's license, military identification)

card, employee badge or identification card and, if necessary, proof of authority). Additional identity verification procedures may be required, as warranted. Requests must meet the requirements of EPA regulations that implement the Privacy Act of 1974, at 40 CFR part 16.

Privacy Impact Analysis: Related to Notice

Privacy Risk:

With regards to PIA related to notice, only the employee's hours and job codes are entered in PPL T&A. No privacy information is entered into or collected by PPL T&A. The PII within PPL T&A comes from EPA's Payroll Provider.

igation: *The non-PII information entered is only shared with EPA's payroll provider.*

Section 5.0 Access and Data Retention by the system

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collection.

- 5.1 Do the systems have access control levels within the system to prevent authorized users from accessing information they don't have a need to know? If so, what control levels have been put in place? If no controls are in place why have they been omitted?**

Multiple roles are used to enter/review the information to assure it is handled properly. These roles can be found at the following link, due to a long list.
http://intranet.epa.gov/peopleplus/pdfs/tl_security_roles.pdf

- 5.2 Are there other components with assigned roles and responsibilities within the system? Yes**

- 5.3 Who (*internal and external parties*) will have access to the data/information in the system? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)? EPA Employees -- PPL Help Desk Analyst, Database Support Analyst and Developers**

- 5.4** What procedures are in place to determine which users may access the information and how does the system determine who has access? *The users must log into the system and they are assigned a specific role.*
- 5.5** Explain how long and for what reason the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number. *Records are maintained for 3 years to allow corrections to be made. RCS 300*
- 5.6** Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist? *Yes*

5.7 Privacy Impact Analysis: Related to Retention

Privacy Risk: *That there is a data breach during the time that the PII is retained*

Mitigation: *The servers are encrypted, there are network firewalls in place, multi-factor authentication is used for user access, and security background checks of individuals who have system access to the PII are performed.*

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the system information sharing external to the Agency. External sharing encompasses sharing with other federal, state and local government, and third-party private sector entities.

- 6.1** Is information shared outside of EPA as part of the normal agency operations? If so, identify the organization(s), how the information is accessed and how it is to be used, and any agreements that apply. *Yes*
- 6.2** Describe how the external sharing noted in 6.1 is compatible with the original purposes of collection in the SORN noted in 3.4. *The SORN notes that information is shared with the EPA payroll provider.*

- 6.3 Does the agreement place limitations on re-dissemination?** *Yes*
- 6.4 Describe how the system maintains a record of any disclosures outside of the Agency.** *PPL tracks any file transfers to the EPA payroll provider.*
- 6.5 How does the system review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within EPA and outside?** *It follows procedures set out by NIST and EPA's CIO.*
- 6.6 Privacy Impact Analysis: Related to Information Sharing**
Privacy Risk: *That the privacy information that is downloaded from EPA's payroll provider is compromised.*

Mitigation: *Server encryption, network firewalls, multi-factor user access, security background checks of individuals who have system access to the PII.*

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

- 7.1 What are the procedures that allow individuals to access their information?**

With regards to the information that employees enter into PPL, employees have access to the information by simply logging into PPL. With regards to information downloaded from EPA's payroll provider, employees must contact their EPA HR representative.

- 7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Requests must be submitted to the agency

contact indicated on the initial document for which the related contested record was submitted.

7.3 How does the system notify individuals about the procedures for correcting their information?

Any individual who wants to know whether this system of records contain a record about him or her, who wants access to his or her record, or who wants to contest the contents of a record, should make a written request to the EPA Privacy Officer, MC2831T, 1200 Pennsylvania Avenue NW., Washington, DC 20460.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: *There is no risk regarding the right to redress regarding privacy information since no privacy information is entered into PPL to redress.*

Mitigation: *N/A*

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

8.1 How does the system ensure that the information is used in accordance with stated practices in this PIA? *All users are subject to security controls and roles in the system. They all have at least a basic NACIS background screening. All EPA personnel with access to sensitive data are required to undergo a higher level of background screening sponsored by EPA. All passwords automatically expire after 60 days of non-use.*

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection. *In order to maintain their access, all users must attend all required security awareness training sessions as well as read and adhere to the Security Rules of Behavior for PPL Users.*

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk: *That audits are not completed and the safeguards implemented are not followed.*

Mitigation: *See 8.1 and 8.2.*