US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

09/12/2016

OPDIV:

FDA

Name:

Administrative Applications: Special and Permanent Employment

PIA Unique Identifier:

P-4685007-054817

The subject of this PIA is which of the following?

Minor Application (child)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

Yes

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

Yes

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

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

Describe the purpose of the system.

This PIA addresses six applications residing within the overarching Administration Applications (AdminApps) system. Each is used either to accept applications for various forms of employment at FDA other than permanent career employment, or to serve as a repository for those applications to permit review and selection of qualified candidates. The systems are:

1. The Center for Veterinary Medicine (CVM) OnLine Career Profiles/Student Profile and Center for Tobacco Products (CTP) Career Profile applications (collectively "Career Profiles applications"). The Career Profiles applications are used to collect materials for individuals interested in employment with the FDA. The Centers review these materials and then notify submitters if opportunities become available that match their interests; the actual job application must be made through other channels (such as the government-wide USAjobs system).

2. Career/Student On Line Submission is used to receive application materials from students interested in various internship programs available to undergraduate and graduate students.

3. CVM Career/Student Tracking. This system is used to store student applications for certain FDA internships and similar opportunities for students. Applications may be for one of several programs sponsored within CVM. FDA staff responsible for evaluating applications for possible selection for student positions (hereafter "evaluators") use this system to review, and assess application materials, and ultimately to select candidates for internships. Evaluators are able to access all applications materials, and can share documents with each other containing notes concerning their assessments of applications.

4. Fellowship Online Application Submission is used to collect applications materials for FDA's Fellowship program. It is web-enabled and can be reached through FDA's main website. It does not collect or store PII, but passes it through to the Fellowship application, a repository.

5. Fellowship is used to store and share applications from healthcare professionals, scientists, and engineers who apply for FDA's two-year Fellowship Program. Accepted applications receive regulatory science training and the chance to conduct research on targeted scientific, policy, or regulatory issues under the mentorship of an FDA senior scientist. Evaluators use this system to share, review, and assess application materials, and ultimately to select candidates for internships and fellowships.

6. OCC Applicant Reviewer is used to receive, review, and evaluate applications for employment with the Office of Chief Counsel (OCC).

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

These applications collect data related to individuals' interest in and qualifications for internships and fellowships. Materials submitted may include resumes/curricula vitae, letters of recommendation, personal statements (e.g., essays expressing personal goals and reasons for seeking these positions), academic transcripts from any/all educational institutions attended, and/or names of projects or offices in which the applicant is interested. Some of these documents may further contain within them contact information (name, e-mail address, phone number, mailing address); professional or other experience (e.g., volunteer work or involvement in student groups); assessments of suitability by individuals serving as references; and any other application materials. Some also require information related to citizenship status, including green card information for non-US citizens.

All applications addressed in this PIA use a single sign on (SSO) multi-factor approach to authentication, and do not store additional, system-specific usernames or passwords.

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

The CVM OnLine Career Profiles/Student Profile and CTP Career Profile, Student Applicant Submission, Career/Student Tracking, Fellowship Online Application Submission, Fellowship, and OCC Applicant Reviewer applications are used to collect, store, and/or share information described previously that is used to evaluate candidate for special or regular employment at the FDA. CVM OnLine Career/Student On Line Submission and Fellowship Online Application Submission are used to collect this information. These systems do not retain or store information, but pass it through to other systems. They are web-enabled interfaces, accessible to the public, to be used for the purposes of submitting materials.

Career Profiles Applications, CVM Career/Student Tracking, Fellowship, and OCC Applicant Reviewer are repositories for this information. They are used by evaluators to assess and select candidates for these positions.

FDA may use PII, such as applicants' names, to retrieve records from Career Profiles applications, CVM Career/Student Tracking, Fellowship, and OCC Applicant Reviewer. FDA does not use PII to retrieve records from Student Applicant Submission and Fellowship Online Application Submission.

If candidates are selected and accepted, their information may be shared with the Office of Personnel Management (OPM). However, FDA will not share that information directly from these systems, but will instead provide selected candidates with the appropriate forms to be submitted directly.

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

Yes

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

Name

E-Mail Address

Mailing Address

Phone Numbers

Certificates

Education Records

Military Status

Employment Status

Foreign Activities

Professional experience, honors and awards, letters of reference, positions or tasks in which the candidate is interested, citizenship information (possibly including green card number for non-US citizens.

Any other information related to an individual's qualifications for these positions that the individual chooses to provide. Personal statement describing reasons the individual is interested in the position.

Green card information, e.g., immigration status and dates

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

Employees

Public Citizens

Applicants are public citizens. Accepted applicants are special government employees (SGEs).

How many individuals' PII is in the system?

500-4,999

For what primary purpose is the PII used?

The PII is used to accept and manage application materials and evaluate candidates for internship and fellowship positions and accept them into those roles.

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

None.

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

These systems support the necessary function of identifying, evaluating, and employing staff with appropriate knowledge, skills and abilities, an activity authorized generally by 5 U.S.C. Section 301, "General authority to employ: Each Executive agency, military department, and the government of the District of Columbia may employ such number of employees of the various classes recognized by chapter 51 of this title as Congress may appropriate for from year to year." Title 5 provides further requirements on the collection and evaluation of information related to employment.

Authorities to collect for any personnel records maintained by FDA Centers, i.e., not shared with OPM include: 5 U.S.C. 1302, 2951, 4118, 4308, 4506, 7501, 7511, 7521 and Executive Order 10561.

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

Yes

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

OPM/GOVT–5, Recruiting, Examining, and Placement Records

Identify the sources of PII in the system.

Online

Identify the OMB information collection approval number and expiration date

Not applicable. The system point of contact is nevertheless confirming with the FDA office responsible for requesting information collection approval (ICA) that none of the applications require OMB ICA.

Is the PII shared with other organizations?

No

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

Individuals submit all information themselves at the time of collection via a web-enabled tool. Web pages on FDA.gov provide detailed information on what information applicants must submit and the application and evaluation process generally. Web pages provide Privacy Act Notice statements.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

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

The program itself is voluntary; however, the information is necessary to appropriately screen potential applicants for the skills and experience necessary. Opt out is therefore not possible; candidates must supply PII to be used as the basis of assessment.

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

No such changes are anticipated. If the Agency changes the collection, use, or sharing of PII data in this system, the affected individuals will be notified by the most efficient and effective means available and appropriate to the specific change(s). This may include a notice on the web site, or e-mail notice to the individuals.

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

Applicants may address any such issues by contacting the FDA coordinator of the program or activity to which they are applying or using general FDA contact information. Any such concerns would be reported to appropriate offices within FDA which may include the system administrator, the Computer Security Incident Response Team, or a Help Desk. After an applicant is hired, changes to name or address would be updated using a Standard Form 50 or 52 and the data would be updated in FDA's human resources information system.

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

PII is used transitionally to address a specific business function (identifying and appointing interns and/or fellows). PII is not used persistently, and no periodic reviews are made. Applicants are responsible for ensuring the information they provide is accurate and relevant.

Appropriate security controls have been selected from the National Institute of Standards and Technology's (NIST's) Special Publication 800-53, as determined using Federal Information Processing Standard (FIPS)199, to protect the PII availability and integrity.

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

Users:

"Users" are FDA employees who need access to these systems to perform their duties related to evaluating applications and selecting interns or fellows. Applicants have no access to PII except their own.

Administrators:

Users within FDA have full administrative access to conduct management and oversight of the information system.

Developers:

Developers will not normally have access to PII, but may in the course of maintaining the systems or providing technical assistance.

Contractors:

Some developers may be direct contractors and will have access under the same circumstances as developers.

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

Users who require access to the information system need to have supervisor approval and sign off before access is granted. The user's supervisor will use an account creation form to specify the minimum information system access that is required in order for the user to complete his/her job. FDA reviews the access list for the system on a quarterly basis to review and adjust users' access permissions, and to remove unnecessary accounts from the system.

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

Management establishes roles for individual personnel, with role-based restrictions permitting access only to information that is required for each individual to perform his/her job.

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

All personnel/users are required to complete FDA's IT Security and Privacy Awareness training at least annually.

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

System documentation is available. FDA is reviewing system documentation to determine whether it would be appropriate to make this documentation available generally on the FDA intranet.

All users are instructed on adhering to the HHS Rules of Behavior in the context of their work involving this system. For additional privacy guidance, personnel may contact FDA's Privacy Office. Privacy program materials are provided to personnel on a central intranet page. Personnel may also take advantage of information security and privacy awareness events and workshops held within FDA.

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

Yes

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

For all these systems, records are retained under FDA Records Schedule 4110, Program Management Files (NARA approved citation N1 088-04-5).

This schedule is intended to include applications explicitly, along with any related program materials. Disposition for these files is temporary. Document retention dates are cut off at the end of each calendar year, and documents are to be destroyed or deleted ten years after the cutoff date.

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

Administrative safeguards include training and awareness provided for all users; system documentation that advises on proper system use; implementation of Need to Know and Minimum Necessary principles when awarding access, and others. Technical safeguards include that PII entered via these systems is immediately pulled through the web-based systems into the systems that are internal and not connected to the web, removed from the public site, and not accessible to others submitting information via these systems or fda.gov. Physical controls include that all system servers are located at FDA facilities protected by guards, locked facility doors, and climate controls. More broadly, appropriate controls have been selected from the National Institute of Standards and Technology's (NIST's) Special Publication 800-53, as determined using Federal Information Processing Standard (FIPS) 199.

Identify the publicly-available URL:

http://www.fda.gov/AboutFDA/WorkingatFDA/FellowshipInternshipGraduateFacultyPrograms/CommissionersFellowshipProgram/ucm115802.htm

http://www.accessdata.fda.gov/scripts/CareersOnLine/TR/ctp/st/index.cfm

http://www.accessdata.fda.gov/scripts/CareersOnLine/TR/studentTracker/index.cfm

http://accessdata.dev.fda.gov/scripts/CareersOnLine/TR/ctp/index.cfm

http://www.accessdata.fda.gov/scripts/CareersOnLine/TR/AppTracker/index.cfm

Note: web address is a hyperlink.

Does the website have a posted privacy notice?

Yes

Is the privacy policy available in a machine-readable format?

No

Does the website use web measurement and customization technology?

Yes

Select the type of website measurement and customization technologies is in use and if it is used to collect PII.

Session Cookies that do not collect PII.

Does the website have any information or pages directed at children under the age of thirteen?

No

Does the website contain links to non- federal government websites external to HHS?

No

Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?

No