

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

06/17/2016

**OPDIV:**

OS

**Name:**

Commissioned Corps Business Process Management System

**PIA Unique Identifier:**

P-5229583-028744

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

Major Application

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

Operations and Maintenance

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

Yes

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

No

**Identify the operator.**

Agency

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

Existing

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

Yes

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

PIA Validation

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

None

**Describe the purpose of the system.**

The Commissioned Corps Business Process Management (CCBPM) system supports business process flow and document management. The CCBPM system provides the backbone infrastructure for the Commissioned Corps Electronic Officer Personnel Folders (eOPFs) and provides the support for the Corps Promotion Cycle application. The system indexes and stores validated documents related to Corps Officer careers, including application documents, license certificates, transcripts, evaluation reports, award certificates, and personnel orders. The system also controls the business processes for the Corps Promotion Cycle application.

The Promotion Cycle application contained in the CCBPM system is run, once a year from March through June. Promotion Boards are held for each Commissioned Corps category (Doctor, Nurse, Dentist, Engineer, etc.). Corps Officers eligible for promotion have their eopf records review and scored by the Board and then ranked against other Corps Officers who are also eligible for promotion in that category.

The Promotion Boards are made up of Corps Officers that have the rank of Captain (CAPT) for each Commissioned Corps Category. For example, the Nurse promotion Board is made up of Nurse Officers holding the CAPT rank, the Dental Promotion Board is made up of Dental Officers holding the CAPT rank.

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

The collected information is the Corps Officer's personnel data which includes: transcripts for their qualifying degree, various service documents, employment data, awards history, performance reviews, and other data associated with a Corps officer's career.

CCBPM collects the following personally identifiable information (PII): Social Security Number (SSN), Employee ID (EMPLID), full name, personal mailing address, personal phone numbers, certifications, medical record numbers, medical notes, personal financial account information, personal email address, education records, military status, and employment status. The SSN and EMPLID are encrypted in the Database.

'Direct Contractors' working on the CCBPM applications and Administrators of the system log on to the CCBPM in order to do their work. Their credentials to log onto the system (userid and password) are stored on the system.

The system discloses PII to Agency Liaisons and Chief Professional Officers so that they can provide career counseling to officers as well as perform certain agency-specific personnel actions that require the PII. The system also discloses PII to analysts who perform Human Resource functions (Awards, Personnel Orders) using the data.

The SSN is also used in connection with lawful requests for information from former employers, educational and financial institutions.

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

The Commissioned Corps (CC) is a uniformed service, lead by the Surgeon General, that provides health services to the Indian Health Services (IHS), the Bureau of Prisons (BoP), the Coast Guard, and many other federal agencies. The CCBPM system supports business process flow and document management for employment issues related to the CC. The CCBPM provides the backbone infrastructure for the Commissioned Corps electronic Officer Personnel Folders (eOPFs), which contain a broad range of employee information. The CCBPM also serves as a repository and routing system for employee information that is to be reviewed by members of the Corps Promotions Board application. The system indexes and stores validated documents related to Corps Officers' careers, including application documents, licenses, certificates, transcripts, evaluation reports, award certificates, and personnel orders. The system also controls the business processes for the Corps Promotion Board application. The system is used to house and share eOPFs.

The system stores the user account credentials (userid and password) for Commissioned Corps Active duty Officer Accounts, Administration Accounts and direct contractor accounts. The Administration and Contractor accounts limit access to performing system maintenance on the system and do not allow access to view Officer's eopf records.

The system discloses PII to Agency Liaisons and Chief Professional Officers so that they can provide career counseling to officers as well as perform certain agency-specific personnel actions that require the PII. The system also discloses PII to analysts who perform Human Resource functions (Awards, Personnel Orders) using the data.

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

Yes

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

Social Security Number

Date of Birth

Name

E-Mail Address

Mailing Address

Phone Numbers

Medical Records Number

Medical Notes

Financial Accounts Info

Certificates

Education Records

Military Status

Employment Status

Employment Records

Employment ID

User names

Passwords

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

Employees

Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

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

10,000-49,999

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

The Corps uses this data to maintain eOPFs and manage business processes related to hiring, promotions, evaluations, awards, and other similar employment-related activities.

The system discloses PII to Agency Liaisons and Chief Professional Officers so that they can provide career counseling to officers as well as perform certain agency-specific personnel actions that require the PII. The system also discloses PII to analysts who perform Human Resource functions (Awards, Personnel Orders) using the data.

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

PII is not used for secondary purposes. PII data is not used for reporting.

**Describe the function of the SSN.**

The SSN is used as an identifier throughout an Corps Officer's career. It is used primarily to identify an Corps Officer's personnel, leave, and pay records and to relate one to the other. The SSN is also used in connection with lawful requests for information from former employers, educational and financial institutions. The information gathered through the use of the number will be used only as necessary in personnel administration processes carried out in accordance with established regulations and published notices of systems of records. The use of the SSN is made necessary because of the large number of present and former active, inactive, and retired officers and applicants who have identical names and birth dates, and whose identities can only be distinguished by the SSN.

**Cite the legal authority to use the SSN.**

42 U.S.C.; 202 et seq. Executive Order No. 10450

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

Please see Executive Order 11140. Executive Order 11140 (Jan 30, 1964), "Delegating certain functions of the President relating to the Public Health Service (PHS)," permits the Secretary of Health and Human Services broad powers to appoint commissioned officers of the Reserve Corps; to prescribe titles, appropriate to the several grades, for commissioned officers of the Public Health Service other than medical officers; to make or terminate temporary promotions of commissioned officers of the Regular Corps and Reserve Corps; and the authority to prescribe regulations appropriate to the operation of the Corps. Note that the text of this Executive Order is also available in the Federal Register at 29 FR 1637 and in the Code of Federal Regulations at 2 CFR, 1964-1965.

**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.**

09-40-0001 PHS CC General Personnel Records

**Identify the sources of PII in the system.****Directly from an individual about whom the information pertains**

In-Person

Hardcopy

Email

**Government Sources**

Within OpDiv

Other HHS OpDiv

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

Not Applicable

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

Yes

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

**Within HHS**

Agency Liaisons and Chief Professional Officers-to provide career counseling to officers and perform certain agency-specific personnel actions.

Pay and Personnel technicians enter daily transactions into the Pay and Personnel system. These transactions are the daily personnel orders for the commissioned corps officers. After the personnel orders are entered into the pay and personnel system a copy of the transaction is automatically placed in the Officers eOPF folder. During this process there is no disclosure of a record outside of HHS.

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

N/A.

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

The Commissioned Corps Electronic Official Personnel Folder (eOPF) allows an Active Duty Corps Officer to grant access to another authorized system user to view parts of their eOPF. This is done in the eOPF system by the Officer. The access is granted for up to 2 weeks and all access activity to the eopf is logged in the Oracle database. An Administrator is able to view and print the log, if needed.

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

When an Officer applies to the Corps, they are notified via the application materials how their data will be used. Officers consent to the PII use by sending the data in to the Corps as part of their application process. Corps Officers also sign data collection forms.

**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.**

There is no opportunity to opt-out of the collection or use of their PII if they want to become a Corp Officer, it is part of the process. This is communicated through a security statement on the Officer Secure area login screen to the eOPF and a link to the HHS Privacy Policy Notice on the bottom of every eOPF page.

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

Major changes to the system have not been made, but if CC made major changes, data subjects would be informed using three channels of communication: electronic mail, messages in CCBPM itself, and via the Commissioned Corps bulletin.

Changes to the way the CCBPM data is handled must be driven by changes to Corps policies. Corps policy changes have a well-defined process for initiation, analysis, and implementation. The process includes gathering feedback from Corps officers, either through Corps Liaisons or by Working Integrated Policy Teams. Individuals must give non-HR users access to their data.

**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.**

Individuals that suspect their information has been misused can contact the CC's Freedom of Information Act (FOIA) Officer via a dedicated email account, phsopffix@hhs.gov. Individuals must supply their name and PHS Serial number. This individual escalates concerns to the Director, who contacts security staff for Office of the Assistant Secretary of Health (OASH). Security staff are well-versed in Health and Human Services incident handling procedures, which are HHS-wide and consistent with federal requirements.

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

The CCBPM Information System Security Officer (ISSO) conducts annual reviews of the data to verify security compliance.

There is an annual HHS audit of the Commissioned Corps Personnel system to ensure the integrity of the PII data that is stored there. The CCBPM servers are all maintained and have the latest mandatory security patches applied. The Corps Officers' data is reviewed on an annual basis to ensure that it is accurate and up to date and that unnecessary and outdated PII is removed from the system.

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

**Users:**

The system contains the electronic Personnel Files of Individual PHS Corps Officers, who, as users, have access to their own personnel data so that they can verify its correctness and to manage their careers.

**Administrators:**

The System Administrators have the ability to correct any problems identified with the data. Other users do not have the rights to correct certain critical data elements.

**Contractors:**

'Direct Contractors' working on the CCBPM applications and Administrators of the system log on to the CCBPM in order to do their work. Their credentials to log onto the system (userid and password) are stored on the system.

**Others:**

Special users include HR Specialists who perform HR functions; Liaisons and Chief Professional Officers, who provide career counseling to Corps Officers and limited personnel actions.

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

Level of access is determined by the user role. All roles except Administrator limited to read only access. Access accounts are locked after 60 days inactivity and quarterly reviews of login activity are used to deactivate accounts. Accounts are also deactivated when request is received from account holder's supervisor.

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

Access levels are provided and restricted based on the user's role and responsibilities.

**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.**

Current trainings includes:

Information Systems Security Awareness  
Privacy Awareness Training

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

A quarterly CCBPM training session is presented on site by the contractors on the system. Topics include new security features being planned and security features implemented in the current release; Demonstration of available reporting features of the system that help diagnose system performance and help troubleshoot issues; Discussion of planned future enhancements of the system.

**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.**

Data is retained and never destroyed.

Data for inactivated Corps Officers is flagged and archived.

The National Archives and Records Administration (NARA) retention schedule is currently being determined. All Information is being retained until the NARA retention schedule is put into place.

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

Administrative: All requests for user accounts in the system must be justified by the user's supervisor and approved by the system owner. Each Officer's data is maintained and monitored by the officer. Signed Rules of Behavior forms collected from the users on a regular basis. Sign in log for the server room.

Technical: Accounts are individual, with usernames and complex passwords. Role based access to data. Data servers protected by firewalls. Audit tables.

Physical: Building has controlled access, which includes Guards, metal detectors, ID-based access. Server room access controlled by key card and cipher lock.