

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

08/16/2016

OPDIV:

FDA

Name:

FDA OC Position Description Library

PIA Unique Identifier:

P-8713065-590079

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?

New

Does the system have Security Authorization (SA)?

Yes

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

The FDA Office of Human Resources uses the Position Description Library (PDL) tool/system to classify FDA position descriptions and simultaneously build an online "library" to house the position descriptions (PDs) and to utilize for position management and reporting purposes. The PDL tool/system assists FDA human resources (HR) classification specialists as they review the characteristics of positions and develop formal PDs, job series and other designations and materials associated with federal positions.

This system provides an electronic means for managers and HR staff to search existing approved PDs and/or build new PDs. It includes workflow awareness enabling personnel involved in the process to know the status of each PD being classified. It also provides automated edits aligned with regulatory requirements to streamline the classification process, reduce current time frames, and address the backlog of position descriptions waiting to be classified.

The PDL is not used as part of the actual recruitment or hiring analysis regarding individual applicants and employees. The PDs are not specific to individuals and do not contain any information about individuals. The system will only be used to create and certify PDs prior to recruitment and hiring actions.

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

The system will store information about positions and the classification process. The data includes job series, standard title, grade, location, salary, reports to, administrative code, and service and position number. Employee names are only used within the system as necessary to manage the classification of unique positions requiring a peer review and in support of position management reporting.

System users (FDA and direct contractor employees) access the PDL system via web browser. A username and password is required for access to the system. Anyone requiring an Avue FDA PDL system account must complete an account request form with their name and work e-mail address. Name and e-mail information uploaded from data provided by FDA will be included in the system for account creation and validation purposes. The vendor, Avue, is required to destroy the account creation work sheets provided by FDA after creating the associated accounts. After the account is created, the e-mail address on file will be used to provide the account holder their initial account ID, to send a separate e-mail with their temporary password and instructions for changing it upon initial access to the system, and for future workflow notifications.

In most cases employee names are not utilized within the system outside the account and workflow processes. In some instances, the system captures the names of those employees who play a role in the classification of positions that involve a peer review process. The peer review process is incorporated in the classification of certain positions, such as unique positions and positions subject to certain regulatory requirements. For purposes of a Fair Labor Standards Act (FLSA) position description re-mediation and compliance effort, project managers examine position descriptions relevant to their personnel and complete a worksheet. This worksheet completion is automated within the PDL system and requires agency managers to identify the employees covered by the PD they are reviewing. The PDL system does not contain Avue Technologies staff personnel information. The position descriptions are associated only with FDA positions.

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

The PDL tool is a Software-as-a-Service (SaaS) product provided by the Avue Technologies Corporation. The software is cloud based, hosted by Amazon GovCloud as Platform-as-a-Service (PaaS). Both Avue and Amazon GovCloud have received certification under the Federal Risk and Authorization Management Program (FedRAMP).

PDL data is about position descriptions. Data about individuals is largely unnecessary, and the design and operation of PDL minimizes FDA's use of employee names specifically and other PII generally. Employee names are only utilized for peer review positions. This use is necessary because these position classifications are unique to the individual. The FDA affirmatively prohibits any population (filling in) or other use of standard PII fields built into the system by Avue but which are unnecessary to FDA in this context such as military status, employment status and date of birth.

FDA OHR employees have access to other more useful systems such as the HHS Capital Human Resources (CapHR) system when they are performing tasks that relate to identifiable individuals. PDs in PDL are tied to a unique ID for the position description. PDL uses a separate unique ID for supervisory personnel associated with positions covered by the relevant PDs. Neither unique ID is associated with employee name or e-mail addresses in PDL.

FDA users retrieve records in PDL in order to find a PD or information about PDs (e.g., position classification status). The primary method of record retrieval is by use of position information (unique position ID, duties, etc.) It is technically possible to do so, but is not a matter of practice for FDA personnel to conduct record retrieval by use of PII such as an individual's name or the unique ID (within PDL) for a supervisory employee.

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

Phone Numbers

E-mail address and phone number are work contact information not personal.

System account ID and password.

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

Employees

Vendor/Suppliers/Contractors

How many individuals' PII is in the system?

10,000-49,999

For what primary purpose is the PII used?

The PII is used for account creation, PD reviewer work assignment, finding PD's in the system and workflow notifications.

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

Not applicable.

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

5 U.S.C. 3301, 3302; 5 U.S.C. 301.

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

No

Identify the sources of PII in the system.

Online

Government Sources

Within OpDiv

Identify the OMB information collection approval number and expiration date

Not applicable.

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.

Currently there is no system-specific notice to individuals. Employees are aware through participation in the FLSA remediation process described elsewhere in this assessment. Personnel are advised of the agency's use and public disclosure of their work-related PII as necessary in the context agency activities.

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 opt-out if employees need access to the PDL system. General employees will not have access to the application and are not involved with directly entering the information, this is done by periodic uploads of information into the system from existing HR data sources or by identified users involved with the position classification and management process. System account holders can complete the account request/termination form when they no longer need an account and their account information will be removed once terminated.

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

No major changes are planned or anticipated. In the event of such changes, relevant individuals could be notified, and any necessary consent obtained, in a number of ways via e-mail, statements on forms (e.g., account request) and web pages and updated user guides.

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 may raise concerns with their supervisor, the Office of Human Resources, and FDA's Privacy Office. If an employee suspects their PII has been compromised they may contact the FDA Systems Management Center by e-mail or phone.

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 integrity, accuracy and relevancy of data received by Avue is reviewed and addressed when received into the Position Description Library system. Corrupted, incorrect or out of date PII discovered in the course of system use is addressed at that time of discovery and does not affect availability. Individuals may update or correct their information at any time through the FDA Office of Human Resources.

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

Users:

HR Specialists, Human Capital Liaisons, Supervisors/Authorizing Officials for general access to the system.

Administrators:

Avue Technology system/database administrators will have access to create accounts, change passwords and remove accounts.

Contractors:

OHR contractors involved with position Classification projects.

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

Avue will create, modify, and delete user accounts as specified by the FDA Avue account manager who confirms individual roles before specifying the role-based access Avue is to set for each user. FDA employs user role-based access specifications established in the PDL system. Four role-based access and control restriction types are designated: HR Specialist (Classifier), HR Specialist (Staffing), HR Liaison and HR Manager.

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.

FDA OHR and Avue apply administrative and technical methods to ensure minimum necessary access. The system is role-based and account requests must follow the FDA system access procedures established by OHR for this system. FDA account managers determine who will be granted access to the Position Description Library tool and access must be approved in writing by their immediate supervisor.

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 complete security and privacy awareness training at least once every calendar year. Individual role based training is provided to each FDA privileged system user requiring access for the position description process. They must follow the IT systems rules of behavior and complete the annual FDA IT awareness training.

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

Each system user receives application training specific to the PDL tool based on their role before being granted access to the Position Description Library.

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.

Records are retained and destroyed in accordance with existing applicable federal retention schedules. Position Classification Standard Files: (1) Standards and guidelines issued or reviewed by OPM and used to classify and evaluate positions within the agency: Records can be destroyed when superseded or obsolete. (N1-GRS-81-11 item 1)

Position Description: Record copy of position descriptions that include information on title, series, grade, duties and responsibilities, and related documents. Can be destroy 2 years after position is abolished or description is superseded. (N1-GRS-88-4 item 1).

Account access records: Disposition is temporary, records are destroyed when business use ceases. Avue is required to destroy account creation work sheets containing PII immediately after completing account creation.

FDA File Code 9962 (GRS 20, Item 1c; superseded by the new GRS 3.2, item 030 (DAA-GRS-2013-0006-0003)

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

FedRAMP certified cloud based SaaS provider Avue and PaaS provider Amazon GovCloud secure the PII within the PDL tool by following the NIST 800-53 and FedRAMP standards. Administrative safeguards include user training; system documentation that advises on proper use; implementation of Need to Know and Minimum Necessary principles when awarding access, and others. Technical Safeguards include usernames, passwords, use of SSL and others. Physical controls include that all system servers located at the Avue facilities are protected by guards, locked facility doors, and climate controls based on security measures mandated by FedRAMP.