



**Privacy Impact Assessment  
for the  
Performance and Learning Management System  
(PALMS)**

**DHS/ALL/PIA-049**

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## Abstract

The Department of Homeland Security (DHS) Office of the Chief Human Capital Officer (OCHCO) procured the DHS Performance and Learning Management System (PALMS) to facilitate the performance management process and consolidate the existing DHS Component learning management environments that support workforce training. DHS is conducting this Privacy Impact Assessment because, when fully implemented, PALMS will collect, maintain, use, and disseminate personally identifiable information (PII) about all DHS employees and contractors.

## Overview

The DHS Office of the Chief Human Capital Officer (OCHCO) manages learning and performance management policies at the Department. The DHS Office of the Chief Information Officer and OCHCO acquired PALMS as an enterprise-wide system, which automates the paper-based performance management process and consolidates the multiple e-training systems into a single integrated platform. PALMS consists of two discrete modules: Learning Management and Performance Management. These modules are software hosted in a cloud that only contains DHS data at a vendor-managed datacenter.<sup>1</sup> All DHS federal employees and contractors (users) have access to the Learning Management module to complete their training requirements. Only DHS federal employees will have access to the Performance Management module. DHS uses PALMS to meet the Office of Personnel Management's (OPM) training and performance management mandates.<sup>2</sup>

PALMS uses payroll data from the U.S. Department of Agriculture's National Finance Center (NFC) Payroll Personnel System (PPS)<sup>3</sup> and DHS Web Time and Attendance System (WebTA)<sup>4</sup> to create and maintain user accounts for DHS federal employees. The NFC provides human resources, financial, and administrative services for many agencies of the United States Federal Government. PALMS retrieves data from the Integrated Security Management System (ISMS)<sup>5</sup> to create and maintain accounts for DHS contractors and to populate limited account

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<sup>1</sup> "Cloud computing is a model for enabling ubiquitous, convenient, on-demand network access to a shared pool of configurable computing resources (e.g., networks, servers, storage, applications, and services) that can be rapidly provisioned and released with minimal management effort or service provider interaction." Nat'l Inst. Standards & Tech., NIST SP 800-145, The NIST Definition of Cloud Computing (2011). DHS PALMS is currently undergoing FedRAMP certification to ensure IT security in a cloud environment. For more information, please see <http://cloud.cio.gov/fedramp>.

<sup>2</sup> See 5 U.S.C. §§ 4118, 4302, and 4304.

<sup>3</sup> NFC PPS Payroll Personnel System (PPS) Redacted PIA, available at [http://www.usda.gov/documents/NFC\\_PPS\\_Redacted\\_PIA\\_7\\_30\\_07.doc](http://www.usda.gov/documents/NFC_PPS_Redacted_PIA_7_30_07.doc).

<sup>4</sup> DHS/ALL/PIA-009 DHS Web Time and Attendance (Web T&A) System, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>5</sup> See DHS/ALL/PIA-038(a) Integrated Security Management System, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy). ISMS shares information with PALMS through the DHS Trusted Identity Exchange (TIE). DHS is currently conducting a



information for federal employees. PALMS relies on the DHS Active Directory to facilitate e-authentication using a Personal Identity Verification (PIV) card or other authentication methods for all DHS personnel.<sup>6</sup> DHS also uses the data to allow training administrators to appropriately assign training and career development metrics and report on employee demographics and training.

### Learning Management Module

The PALMS Learning Management module manages the life-cycle of learning activities for DHS employees and contractors. It acts as the gateway for learners, trainers, supervisors, and administrators to access training at DHS. The Learning Management module maintains and updates user records, training histories, individual development plans, course catalogs, training resources, and training requirements. DHS shares PII with OPM to report on required training metrics and with other oversight entities, such as the Office of Management and Budget (OMB) and Government Accountability Office (GAO).

The PALMS Learning Management system interfaces with a third-party content provider, Skillsoft Corporation, to provide access to Skillsoft online content libraries. Skillsoft hosts the course content on their servers via Open Learning System Architecture (OLSA) and DHS PALMS accesses the course content when prompted by a user. When the user chooses a Skillsoft course, PALMS creates a thirty-two digit number from the user's first name, last name, user ID, and the course ID, and sends this number to the content provider. The content provider processes the user's request to access the course, provides the course content to the user, and sends progress information, including the successful or unsuccessful course completion to PALMS when the user completes or exits the course.

Skillsoft also provides DHS users access to numerous collections of online books, videos, and other performance support assets via the Books24x7 website. DHS PALMS directly links to the Books24x7 site via a link on the PALMS homepage. Books24x7 relies on a self-registration process, which asks the user to provide his or her DHS email address along with optional first and last names. After the initial registration, Skillsoft sends a password to the provided DHS email address. The user is only allowed to use his or her DHS email address and cannot use his or her personal email account. Once Books24x7 adds the user to its database and if the user completes the Books24x7 registration process, the user can access Books24x7 content from any workstation, tablet, or smartphone device with a connection to the internet.

PALMS allows the user to print a certificate after successfully completing a course. Employees, supervisors, and administrators can run reports after the training has been recorded.

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PIA for the Trusted Identities Exchange.

<sup>6</sup> DHS/ALL/PIA-014(b) - Personal Identity Verification (PIV) Management System, *available at* [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



OPM requires DHS to electronically submit training-related data on a monthly basis to the Enterprise Human Resources Integration (EHRI) data repository.<sup>7</sup>

### *Performance Management Module*

The PALMS Performance Management module moves the existing paper-based performance management process into an electronic environment. By moving performance management to an electronic environment, PALMS assists DHS in fulfilling OPM's employee performance recordkeeping and reporting requirements.<sup>8</sup> Only federal employees have access to the PALMS Performance Management module.

The PALMS Performance Management module electronically documents performance expectations discussed by supervisors and employees at the beginning of the performance period, records Interim Progress Reviews and Mid-Year Performance evaluations, and formally captures supervisory evaluations and employee performance ratings at the conclusion of the performance cycle.

The employee's period of performance begins in PALMS when the supervisor creates a new performance plan within the PALMS Performance Management module. PALMS pre-populates the Performance Management module with basic employee information such as name, grade, and job series. Employee performance goals cascade down from executive, manager, and supervisor goals. PALMS populates pre-defined competencies and associated performance standards related to pay plan, series, grade, and position title into the employee's performance plan. During the period of performance, PALMS supervisors and employees are able to track progress toward completion of the Performance Management program, process events, and also completion of employee performance goals and demonstration of the pre-determined competencies. The PALMS Performance Management module includes features that link organizational performance measures to executive, manager, supervisor, and employee goals listed in performance plans. At the end of the period of performance, the supervisor and employee may meet to discuss the numerical scores the employee achieved toward completion of the goals in the performance plan, numerical scores achieved through demonstration of the performance plan competencies, and the final rating the employee received representing accomplishments for the period of performance.<sup>9</sup>

PALMS forwards the PDF version of the DHS Performance Plan and Appraisal Form that lists the final Rating-of-Record to the DHS Human Capital Business Systems-Enterprise

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<sup>7</sup> OPM Guide to Human Resources Reporting, ch. 5, [http://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/hr-reporting/ghrr07\\_ch5.pdf](http://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/hr-reporting/ghrr07_ch5.pdf).

<sup>8</sup> See 5 CFR § 430.209.

<sup>9</sup> Performance management processes may differ by Component. Please refer to each Component's official guidance on performance management procedures. See also 5 CFR Part 9701, Subpart D.



Integration Exchange (HCBS-EIE) for placement in the employee's OPM electronic Official Personnel File (eOPF).<sup>10</sup> PALMS receives information from the DHS HCBS-EIE system during the performance cycle and populates individual employee Performance Management program information. DHS also enters the employee's official Rating-of-Record (e.g., 5, 4, or 3) into the NFC system after acknowledgment of receipt. DHS uses the NFC system to calculate and process performance awards.

## Section 1.0 Authorities and Other Requirements

### 1.1 What specific legal authorities or agreements permit and define the collection of information by the project in question?

DHS is authorized to collect this information pursuant to:

- 5 U.S.C. § 4103;
- 5 U.S.C. § 4302;
- 5 CFR Part 410, Training;
- 5 CFR Part 412, Supervisory, Management and Executive Development;
- 5 CFR Part 430, Performance Management;
- 5 CFR Part 432, Performance Based Reduction-in-Grade and Removal Actions;
- Executive Order 13111, Using Technology to Improve Training Technologies for Federal Government Employees;<sup>11</sup> and
- Executive Order 11348, Providing for the Further Training of Government Employees.<sup>12</sup>

### 1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The collection of personally identifiable information maintained in PALMS is described by the following SORNs:

- OPM/GOVT-1 General Personnel Records;<sup>13</sup>
- OPM/GOVT-2 Employee Performance File System Records;<sup>14</sup>
- DHS/ALL-003 Department of Homeland Security General Training Records;<sup>15</sup>

<sup>10</sup> See OPM Guide to Personnel Recordkeeping, available at <http://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/personnel-recordkeeping/recguide2011.pdf>.

<sup>11</sup> Exec. Order No. 13111, reprinted as amended in 5 U.S.C. § 4103 note.

<sup>12</sup> Exec. Order No. 11348, reprinted as amended in 5 U.S.C. § 4103 note.

<sup>13</sup> OPM/GOVT-1 General Personnel Records, 77 FR 73694 (Dec. 11, 2012).

<sup>14</sup> OPM/GOVT-2 Employee Performance File System Records, 71 FR 35342, 35347 (June 19, 2006).

<sup>15</sup> DHS/ALL-003 Department of Homeland Security General Training Records, 73 FR 71656 (Nov. 25, 2008).



- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS);<sup>16</sup> and
- DHS/ALL-037 E-Authentication Records System of Records.<sup>17</sup>

### **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

Yes. The PALMS security authorization was approved on May 22, 2014 and expires in three years, unless a significant change to the system requires re-assessment and re-authorization.

### **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

DHS is currently updating its records retention schedule for training records. DHS plans to retain employee training records for five years or upon termination of employment, whichever occurs first. DHS retains employee performance management records in accordance with General Records Schedule 1, item 23. DHS maintains performance appraisal records for non-Senior Executive Service (SES) employees for four years and five years for SES appointees.

### **1.5 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.**

The PRA is not applicable because the collections are related to employees and contractors working on behalf of the Department.

## **Section 2.0 Characterization of the Information**

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

### **2.1 Identify the information the project collects, uses, disseminates, or maintains.**

PALMS collects information from various sources and maintains information for several different purposes.

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<sup>16</sup> DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).

<sup>17</sup> DHS/ALL-037 E-Authentication Records System of Records, 79 FR 46857 (Aug. 11, 2014).



## PALMS Account Management and User Profiles

To facilitate access for DHS employees only, PALMS receives information from NFC PPS system which may include:

- Full name;
- Social Security number (SSN);
- Date of birth (DOB);
- Race;
- Gender;
- Duty location;
- Appointment type;
- Employee status;
- Veteran status;
- Hire date;
- Probation period;
- Salary information;
- Duty hours;
- Position status (i.e., competitive or not competitive); and
- Position information (e.g., occupational series, position title).

WebTA provides the following attributes for federal employees to establish the employee-supervisor relationship:

- Employee ID
- Supervisor Employee ID

ISMS provides the following data to populate federal employee data in PALMS:

- Employee ID
- Email address

DHS contractors use the PALMS Learning Management module only. To facilitate access to Learning Management module, ISMS provides the following attributes for DHS contractors. Contractors will not have access to the Performance Management module.

- Person Handle ID;
- Full name;
- Email address;
- Work location (i.e., city, state, and country);
- Gender; and
- Entry on Duty date.

For all users, DHS Active Directory provides the following data to PALMS to facilitate



application access using the PIV card:<sup>18</sup>

- Email address

## Learning Management

PALMS Learning Management module collects, uses, and maintains information from DHS employees and contractors who participate in or assist with training programs recommended, sponsored, or operated by DHS. PALMS generates a unique internal user ID based on user PII to mask the PII. Users may add or update their telephone numbers in PALMS. PALMS sends the following Enterprise Human Resources Integration (EHRI) data elements to OPM to meet DHS's reporting requirements.<sup>19</sup>

- SSN;
- DOB;
- EHRI employee ID;<sup>20</sup>
- Title;
- Employee Name;
- Component;
- Position Pay Plan;
- Position Series;
- Employee Grade; and
- Employee Summary Performance Rating of Record.

## Performance Management

The Learning Management module populates the Performance Management module. The PALMS Performance Management module collects and stores information about DHS employees relating to performance competencies based on position, performance goals and associated performance standards, and progress toward those goals and performance standards. In addition, it compiles feedback and performance ratings regarding how effectively employees meet those goals.

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<sup>18</sup> Concurrent with this PIA, DHS is conducting a separate PIA on the DHS Trusted Identities Exchanges to describe the risks and mitigations associated with a Department-wide identity attributes hub. Please see the DHS Trusted Identities Exchange PIA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>19</sup> See 5 U.S.C. § 4115; 5 CFR §§ 293.401-06; 430.209.

<sup>20</sup> EHRI ID is a unique number that OPM assigns to an individual to identify the individual's records within the EHRI database.



All information collected and stored within the PALMS Performance Management module is identical to the existing paper-based performance management process. The PALMS Performance Management module collects the following for SES employees from the employee and his or her supervisor:

- Employee name;
- Employee's electronic signature acknowledging start of period of performance;
- Rating Official's name and electronic signature acknowledging start of SES employee's Period of Performance;
- Employee's electronic signature acknowledging progress review was conducted;
- Rating Official's electronic signature acknowledging progress review was conducted;
- Employee's annual performance review Summary Rating Score;
- Employee's Initial Summary Rating provided by Rating Official;
- Employee's electronic signature acknowledging receipt of Rating Official's Initial Summary Rating;
- Employee's electronic signature requesting a higher-level review of Initial Rating Official's Evaluation;
- Employee's Performance Review Board Chairperson's electronic signature acknowledging concurrence (or non-concurrence) of evaluation by the Rating Official;
- Employee's Core Competencies, and associated 'scores' received on each Core Competency;
- Employee's Performance Objectives, and associated 'scores' received on each Objective;
- Employee's Overall Performance Assessment Narrative;
- Employee's Rating Official's Evaluation Narrative;
- Employee's Higher-Level Reviewer Narrative.

The PALMS Performance Management module may collect the following for non-SES employees from the employee and his or her supervisor:

- Employee name,
- Rating Official name;
- Pay band or grade;
- Position title;
- Job series;
- Supervisory status;
- Reviewing Official's name;
- Reviewing Official's organization;



- Reviewing Official's position title;
- Employee's electronic signature acknowledging start of Period of Performance;
- Rating Official's electronic signature acknowledging start of employee's Period of Performance;
- Employee's electronic signature acknowledging occurrence of Interim Progress reviews and Mid-Cycle review;
- Rating Official's electronic signature acknowledging occurrence of employee's Interim Progress reviews and Mid-Cycle Review;
- Employee's electronic signature acknowledging discussion and receipt of evaluation after conclusion of the Period of Performance;
- Rating Official electronic signature acknowledging discussion and delivery of evaluation after conclusion of the Period of Performance;
- Reviewing Official electronic signature acknowledging concurrence of Employee's Rating Official evaluation of employee after conclusion of the Period of Performance;
- Employee's Summary Rating provided by Rating Official to the employee;
- Employee's Core Competencies, and associated 'scores' received on each Core Competency;
- Employee's Goals, and associated 'scores' received on each Goal Performance Standard;
- Employee's Overall Performance Comments/Narrative;
- Employee's Rating Official's Comments/Narrative;
- Employee's Reviewing Official's Comments/Narrative; and
- Rating Official's comments towards employee progress on completion of goals and competencies during the mid-cycle review and after completion of the employee's period of performance.

As required by the OPM Guide to Personnel Recordkeeping, PALMS shares the employee's entire performance plan as a PDF with OPM for inclusion in the employee's eOPF.<sup>21</sup> PALMS sends employee final ratings of record (e.g., 5, 4, 3) into the HCBS-EIE for movement into NFC PPS for historical employment purposes.

## **2.2 What are the sources of the information and how is the information collected for the project?**

PALMS retrieves DHS federal employee account information on a bi-weekly basis from

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<sup>21</sup> OPM Guide to Personnel Recordkeeping, ch. 2, available at <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/personnel-recordkeeping/recguide2011.pdf>.



NFC PPS through the HCBS-EIE interface.<sup>22</sup> NFC PPS is the authoritative source system for payroll and personnel processing. PALMS also receives federal employee account management and user profile information through a connection to the WebTA system. ISMS, through the DHS Trusted Identity Exchange (TIE),<sup>23</sup> provides PALMS with contractor account management and federal employee and contractor user profile information. Both employees and contractors access the system through an Active Directory check of their PIV card or other authentication methods.

Employees are able to make updates to their own contact information within the system (e.g., work address, telephone number, time zone, region location). This allows employees to change their PALMS location information in the event they are on temporary duty assignment.

When an employee or contractor accesses Skillsoft and he or she completes or exits the course, the vendor sends progress information, including the successful or unsuccessful course completion to PALMS. In the Performance Management module, employees, supervisors, and rating officials provide input in performance plans and appraisal forms.

### **2.3 Does the project 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.**

DHS ensures accuracy by retrieving information directly from the NFC PPS, which is the authoritative source system for DHS payroll processing. As PALMS relies on a number of external data sources, the quality of data is dependent on the source systems. The OCHCO reporting team conducts manual data integrity checks as files are prepared for PALMS consumption. The OCHCO reporting team ensures that data meets the PALMS prescribed data formatting requirements and ensures that duplicate records are excluded. PALMS administrators manually check a sample data set prior to sending it to OPM. On a monthly basis data is downloaded from PALMS to HCBS EIE for transmission to OPM. Additionally, if an employee or contractor notices inaccurate data associated with his or her PALMS account, the employee or

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<sup>22</sup> HCBS-EIE maintains a common data model and composite data set for DHS that consists of enterprise Human Resource (HR) data required to support human capital business information requirements. The data repository is maintained by data integration functions with authoritative data from the designated systems of record for each information domain.

<sup>23</sup> ISMS shares information with PALMS through the DHS Trusted Identity Environment (TIE). For more information on TIE, see DHS/ALL Trusted Identity Environment, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



contractor may request a correction by contacting his or her Human Resources (HR) specialist or contracting officer representative.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** PALMS collects more information than is needed to provide employee training and manage performance.

**Mitigation:** This risk is only partially mitigated. As a performance and learning management system, PALMS does not require certain data elements, such as SSN, gender, race, and salary information to provide training or manage performance. OPM requires DHS to provide certain data elements for reporting, and PALMS collects the data that OPM requires for reporting. OCHCO reviewed OPM reporting requirements and collects the mandated fields.<sup>24</sup> DHS relies on technical safeguards, including access to the system through the employee or contractor's PIV card or other authentication methods, system access only from within the DHS network, and audit logs to mitigate this risk.

## **Section 3.0 Uses of the Information**

### **3.1 Describe how and why the project uses the information.**

DHS may use the data collected by the PALMS Learning Management module to:

- Document employee completion of assigned training;
- Allow supervisors to verify successful completion of training activities;
- Approve internal and external training requests;
- Provide employees with detailed reports regarding training progress and accomplishments;
- Manage training costs; and
- Meet OPM reporting requirements.

DHS uses PALMS Performance Management module information to:

- Define and develop employee performance plans and goals;
- Evaluate outcomes, performance, and core performance competencies;
- Provide assistance in the appraisal, growth, and development of DHS employees; and
- Meet OPM reporting requirements.

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<sup>24</sup> See OPM Guide to Human Resources Reporting, available at <http://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/#url=HR-Reporting>.



**3.2 Does the project 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 DHS plans to use such results.**

No.

**3.3 Are there other components with assigned roles and responsibilities within the system?**

Each component will have its own instance of the PALMS application. Initially, PALMS will be made available to DHS Headquarters (HQ) employees; other components will adopt the system over the course of fiscal year 2015 adapted to meet mission needs. Once fully implemented, all DHS employees and contractors will use the system for their training needs, and all DHS employees will use the system to manage their performance plans. Each component will have administrators who will be able to resolve errors and user issues only for their respective component. Authorized users will have access to only their own instance of the application, unless another component has chosen to share some training content.

The HQ Enterprise reporting team will have read-only access to data from each component. PALMS is a DHS-wide system operated by defined user roles with varying degrees of authorities and permissions. Department-wide information is available to only authorized Department leadership user roles requiring timely responses to inquiries. Component-wide information is available to only authorized DHS leadership and Component-defined user roles requiring timely responses to Component-specific inquiries. Specific employee information is only accessible by DHS employees who have an authorized administrative or supervisory capacity.

**3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk for misuse of information by system users who have elevated system privileges.

**Mitigation:** All users have role-based access granted by system administrators. Systems administrators cannot modify their own system privileges. Role-based access controls grant elevated access by module. For example, Learning Management administrators who do not require access to performance management information do not have elevated access in the Performance Management module. This granular role-based access helps prevent users with elevated privileges from accessing information beyond their need to know.

PALMS has robust system audit trails that log any actions taken by users and administrators. Employees who do not safeguard information contained in any DHS electronic



system are subject to appropriate disciplinary action. The PALMS Information System Security Officer also performs monthly audit log and privileged user access reviews. All PALMS users are required to complete annual Information Technology Security Awareness and Privacy training and contractors must sign DHS Non-Disclosure Agreements prior to gaining access to DHS network.

## Section 4.0 Notice

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

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

DHS provides notice on the collection of employee information for learning management and performance management purposes through the Privacy Act Statement provided on the PALMS website, the SORNs listed in Section 1.2, and the publication of this PIA.

### **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

DHS personnel, like personnel at most federal agencies, must participate in the designated learning and performance management programs that measure and evaluate employee performance towards accomplishment of agency missions. Employees accepting a position in a federal agency are instructed on responsibilities associated with employment, including responsibilities of learning and performance management. DHS personnel are not required to provide any additional personal information to use PALMS. Employee data for PALMS is provided by NFC PPS, WebTA, and ISMS. All DHS employees are required to complete their mandatory training using this system. Employees may not opt out of using the system to fulfill their DHS training and performance management responsibilities.

### **4.3 Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk employees are not aware that DHS is retrieving and using their PII from payroll, personnel security, and time and attendance systems.

**Mitigation:** This risk is partially mitigated through the publication of this PIA. In addition, DHS employees and contractors are provided with Privacy Act Statements when they complete the onboarding process with the Office of the Chief Human Capital Officer, which provide notice that their personnel information will be collected and maintained by OPM for a variety of purposes, including learning and performance management. Contractors also receive Privacy Act Statements from DHS when they are granted a PIV card for access to DHS facilities.



Neither of these notices explicitly mention PALMS or the interaction between DHS, OPM, and USDA/NFC. This PIA provides a detailed description of the PALMS source systems and data elements to assist employees and contractors in fully understanding the system.

## Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

### 5.1 Explain how long and for what reason the information is retained.

DHS is currently updating its records retention schedule for training records. DHS plans to retain employee training records for five years or upon termination of employment, whichever occurs first.

DHS retains employee performance management records in accordance with General Records Schedule 1, item 23. For non-SES appointees, DHS destroys:

- Summary performance appraisal records and supporting documents four years after the date of appraisal.
- Appraisals of unacceptable performance, when a notice of proposed demotion or removal is issued but not affected and all related documents, after the employee completes one year of acceptable performance from the date of the written advance notice of proposed removal or reduction-in-grade notice.
- Performance records superseded through an administrative, judicial, or quasi-judicial procedure when the record is superseded.
- Performance-related records pertaining to a former employee when four years old.

For SES appointees, DHS destroys:

- Summary performance appraisal records and supporting documents five years after the date of appraisal.
- Performance records superseded through an administrative, judicial, or quasi-judicial procedure when the record is superseded.
- Performance-related records pertaining to a former SES employee when five years old.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that information will be retained for longer than is required or needed in PALMS.

**Mitigation:** PALMS has a retention feature that is configured to automatically purge data in accordance with the NARA-approved retention schedule for DHS or its components.



## Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

### **6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.**

DHS shares the data listed in Section 2.1 with OPM on a monthly basis using the OPM-prescribed secure file transfer tool. OPM uses the information to support its Government-wide reporting responsibilities.<sup>25</sup>

PALMS Learning Management will also interface with content vendors (Skillsoft, Books 24X7, and Ninth House). The content providers only receive the system-generated thirty-two digit ID. Skillsoft provides course completion status to PALMS.

PALMS automation provides opportunities for the Department to reduce costly expenses associated with hard copy retention of paper files and concurrently comply with Federal Government record retention regulations stated above by forwarding to the HCBS-EIE, a PDF version of an employee's entire performance plan that is subsequently (HCBS-EIE forwards this PDF appraisal form) electronically placed into to OPM's eOPF. OPM requires that all federal employee performance plans are stored in eOPF. Employee information shared outside of DHS is in the form of a PDF file capturing the employee's entire Performance Plan and Appraisal for a period of performance. The following information is in a PDF format that cannot be modified:

- Employee name;
- Component;
- Position title;
- Pay plan;
- Grade;
- Job series;
- Employee performance goals;
- Employee scores/ratings toward completion of objectives/goals;
- Employee scores/ratings toward completion of competencies;
- Employee summary performance Rating of Record;
- Supervisor's name (Rating Official);

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<sup>25</sup> OPM Guide to Human Resources Reporting, <http://www.opm.gov/policy-data-oversight/data-analysis-documentation/data-policy-guidance/#url=HR-Reporting>.



- Supervisor's/Rating Official's comments towards employee progress on completion of goals and competencies during the mid-cycle review and after completion of the employee's period of performance; and
- Reviewing Official's comments towards employee progress on completion of goals and competencies during close-out and review after completion of the employee's period of performance.

Additionally, all employee final ratings of record (e.g., 5, 4, 3) are returned from PALMS into the HCBS-EIE for movement into NFC PPS to ensure that employees receive the correct performance compensation amount, if applicable.

## **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

DHS shares information with OPM under the DHS General Training Records SORN, routine use D.<sup>26</sup> Routine use D permits DHS to share information with agencies performing oversight operations as authorized by law. DHS is required to provide training data for its employees to OPM.<sup>27</sup> OPM provides general oversight of Government training.

OPM/GOVT-1, General Personnel Records, and OPM/GOVT-2, Employee Performance File System Records, contain routine uses that permit external sharing of records related to a federal agency Performance Management Program with OPM. OPM provides general oversight of agency performance management.

DHS shares limited information with Skillsoft pursuant to the DHS General Training Records SORN, routine use I. Routine use I permits DHS to share information with educational institutions or training facilities for the purposes of enrollment and verification of employee attendance and performance. This sharing helps DHS deliver training to its employees.

## **6.3 Does the project place limitations on re-dissemination?**

No, OPM may use the data for its reporting needs. Consistent with the original collection, OPM is the official repository of Federal employees' records.

## **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

OPM and NFC receive user information. PALMS maintains records of disclosure via report logs. The report logs will indicate when the employee information was transmitted to OPM or NFC.

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<sup>26</sup> DHS/ALL-003 - Department of Homeland Security General Training Records, 73 FR 71656 (Nov. 25, 2008).

<sup>27</sup> 5 CFR § 410.601.



## **6.5 Privacy Impact Analysis: Related to Information Sharing**

OPM has government-wide reporting responsibilities related to employee training. OPM requires DHS to provide training-related data. DHS mitigates the risk of improper disclosure of information by only sharing information with external entities when permitted by the DHS General Training Records SORN and when disclosure is compatible with the purpose for which the information was collected.

Government-wide sharing of Performance Management information with OPM is afforded a high-degree of rigor in establishing the appropriate mechanisms and protocols for transmission. PALMS forwards to the HCBS-EIE a PDF version—that cannot be modified—of an employee’s entire performance plan and HCBS-EIE forwards this appraisal to OPM’s eOPF via Secure File Transfer Protocol.

## **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, or filing complaints.

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

All users are authorized to view their personal and individual training and performance management information, as applicable, at any time in PALMS.

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

Basic employee information as described in Section 2.1 is received from the HCBS-EIE into PALMS and if correction is required, the employee must contact appropriate HR Specialists or contracting officer representatives. All employees, administrators and leaders can update their contact information such as work address, telephone number, and their regional information such as their time zone and region location. PALMS Administrators can correct inaccurate information that is reported by an employee. Limited editing capability exists in the Performance Management module to allow updates to be made interactively. Executives, managers, supervisors, and employees can make updates to some fields subject to access permissions and authorities. Fields that are not allowed to be modified provide instructions via drop down to the user on the procedures to follow to correct inaccurate or erroneous information.



### **7.3 How does the project notify individuals about the procedures for correcting their information?**

PALMS provides instructions for the employees, supervisors, and administrators to modify and correct information at initial PALMS training and these instructions will remain available on the PALMS help page. Individuals are also provided notice about the procedures for correcting information in the SORNs listed in Section 1.2.

### **7.4 Privacy Impact Analysis: Related to Redress**

There is minimal privacy risk related to redress because individuals have access to correct some information directly in the system and can request correction of inaccurate information by contacting the user's HR specialist or contracting officer representative. A supervisor is required to verify and make appropriate changes if an individual feels their biographic or training information is inaccurate. They may also contact the PALMS helpdesk for assistance.

Employees are not directed to contact OPM or USDA/NFC to correct inaccurate information. Employees must coordinate through their HR specialist for assistance, who will interact directly with OPM or USDA/NFC.

## **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 project ensure that the information is used in accordance with stated practices in this PIA?**

DHS uses technical controls to ensure that information is used in accordance with the stated practices in this PIA. DHS uses role-based access controls to limit user's access to information. An individual must have a valid and active DHS network account to access PALMS. PALMS also has full audit capability for all data changes in the system.

### **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

DHS provides the required privacy and security awareness training to all employees and contractors, which equips them with information on safeguarding PII. DHS also requires that all PALMS users complete PALMS user training or PALMS privileged user training, as appropriate.



### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

All DHS users will have access to the Learning Management module to complete their training requirements. Only DHS federal employees will have access to the Performance Management module. Each component has their own instance of the application and an assigned site administrator who manages system roles and access. All DHS employees and contractors will have basic user access to the system through their PIV card or other authentication methods. Individuals seeking privileged user access must submit a request to the site administrator. The system maintains an audit log of all changes to the data on a record-by-record basis.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

The PALMS Program Manager, System Owner, Information System Security Manager and Officer, and the DHS Privacy Office review and approve requests for organizations to receive access to or information from PALMS.

## **Responsible Officials**

Vicki Brooks  
Deputy, Chief Human Capital Officer  
DHS HQ/Management Directorate  
U.S. Department of Homeland Security

## **Approval Signature**

Original signed copy on file with the DHS Privacy Office.

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Karen L. Neuman  
Chief Privacy Officer  
U.S. Department of Homeland Security