



Privacy Impact Assessment  
for the

**Chief Human Capital Officer  
DHS Volunteer Force**

**DHS/ALL/PIA-074**

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## Abstract

The Department of Homeland Security (DHS) is recruiting federal employees from all DHS Components and from other federal agencies for the DHS Volunteer Force (DVF), a program that deploys volunteers to the southern border and other locations to help respond to a humanitarian and security crisis. DVF volunteers support U.S. Customs and Border Protection (CBP) or U.S. Immigration and Customs Enforcement (ICE) in those DHS Components' efforts to respond to the border crisis and to stabilize the region. CBP volunteers are assigned to one of five roles that provide services to migrants and detainees: meal distribution, medical assessment, hospital watch, personal property management, or high capacity transport. ICE volunteers are either federal attorneys that help manage ICE's immigration litigation case load or federal health care professionals that help evaluate and treat ICE detainees. DHS is conducting this Privacy Impact Assessment (PIA) because the systems and processes that support the DVF program collect, use, store, and share personally identifiable information (PII) and sensitive personally identifiable information (SPII).

## Overview

On February 15, 2019, President Donald Trump issued Proclamation 9844, *Declaring a National Emergency Concerning the Southern Border of the United States*.<sup>1</sup> The declaration states "the current situation at the southern border presents a border security and humanitarian crisis that threatens core national security interests and constitutes a national emergency." Additionally, the declaration describes sharp increases in recent years in the number of family units entering and seeking entry into the United States, resulting in an inability to provide detention space for many of them while their removal proceedings are pending. It directs the Secretaries of Defense, Interior, and Homeland Security to take all appropriate actions to address the crisis.

Accordingly, former DHS Secretary Kirstjen Nielsen issued a memorandum to all DHS Component Heads and Joint Task Forces on March 27, 2019, requesting their help in soliciting volunteers and temporarily detailing them to the southern border. The memorandum references historic migration flows that "far exceed U.S. capacity" and a humanitarian situation "that grows worse by the day;" and it explains that CBP and ICE are not equipped to deal with the volume of vulnerable populations that are reaching U.S. territory.

The memorandum specifically defines the following CBP functions as requiring immediate volunteer support:

***High Capacity Transportation:*** Provide Component vehicles and licensed personnel to transport 15-50 people per trip to U.S. Border Patrol stations from remote locations,

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<sup>1</sup> 84 FR 4949, available at <https://www.federalregister.gov/documents/2019/02/20/2019-03011/declaring-a-national-emergency-concerning-the-southern-border-of-the-united-states>.



and transport them back from ports of entry and U.S. Border Patrol stations to immigration facilities.

*Medical Assessment:* Provide qualified personnel to conduct initial medical assessments to evaluate the need for professional medical care of juveniles and adult individuals in custody at select ports of entry and U.S. Border Patrol stations.

*Hospital Watch:* Transport individuals in need of medical care to local health providers, provide security detail, and transport them back to the U.S. Border Patrol station once medical personnel designate individuals as fit for travel.

*Distribution of Meals:* Heat and distribute meals, snacks, and refreshments for individuals in custody and document provision of care to ensure individuals receive appropriate nourishment.

*Personal Property Management:* Augment accountability for personal property by tagging and logging bags and items upon individuals' entrance into CBP custody and accounting for items upon transfer from custody.

The memorandum also defines the following two ICE functions as requiring immediate assistance:

*Health Care Providers:* ICE is seeking licensed physicians (MDs or DOs), Advanced Nurses (LPN or LVN), and Registered Nurses (RN) to provide evaluation and treatment of its detained population consistent with facility capabilities and standard of care.

*Attorney Support:* ICE's Office of the Principal Legal Advisor (OPLA) is seeking volunteer attorneys to conduct immigration litigation and case support in exclusion, deportation, and removal proceedings before the U.S. Department of Justice (DOJ) Executive Office for Immigration Review (EOIR).

Shortly after the memorandum was issued, Secretary Nielsen tasked DHS's Office of the Chief Human Capital Officer (OCHCO) to develop and manage the new volunteer program in coordination with appropriate stakeholders across the Department. In response, OCHCO, with significant support from other DHS Components, established the DVF. To support the DVF, OCHCO organized the Volunteer Force Coordination Cell (VFCC), an intra-agency working group that coordinates and assists volunteers to fill the roles identified in Secretary Nielsen's memorandum. The VFCC is staffed by volunteers from across DHS and is supported by subject matter experts from CBP, ICE, the Federal Emergency Management Agency (FEMA), and several DHS Headquarters Components including the Office of the Chief Security Officer (OCSO), the Office of the General Counsel (OGC), the Office of Public Affairs (OPA), and OCHCO. OCHCO, together with the VFCC, defined the scope of the DVF as Federal Government-wide in accordance with the spirit of Secretary Nielsen's memorandum; and thus developed two separate recruitment and application processes, one for DHS employees and one for federal employees at non-DHS agencies.



## Application process for DHS employees

OCHCO developed and maintains a DVF SharePoint site<sup>2</sup> for DHS employees who want to learn more about the program or who want to apply. The site advertises and describes the new volunteer program, provides information on the areas where CBP and ICE need volunteer support, answers frequently asked questions, and shares information about health risks and precautions in the southern border region. The SharePoint site also contains a registration portal that allows DHS employees to apply to the program.<sup>3</sup> To apply using the DVF registration portal, DHS employees complete and submit three forms: a DVF Authorization Statement, a Prison Rape Elimination Act (PREA) Form, and the DVF Registration Form.

### *DVF Authorization Statement*

The purpose of the DVF Authorization Statement is to validate that the applicant's federal supervisor supports the employee volunteering for the length of time specified for the particular role. The form collects the employee's full name, the supervisor's full name, and the supervisor's work phone number. The supervisor indicates his or her decision whether to authorize the employee to volunteer by checking boxes on the form. If the supervisor checks the box indicating no authorization, the supervisor is prompted to check one of several boxes indicating his or her justification for the decision not to authorize. Any applicants who do not receive concurrence from their supervisor are removed from further consideration.

The DVF Authorization Statement form contains a Privacy Notice describing the authorities, principal purpose, routine uses, and impact of refusal to provide the information requested.

### *DVF PREA Form*

The purpose of the PREA form is to evaluate the suitability of applicants to perform their duties in compliance with the Prison Rape Elimination Act of 2003 (PREA),<sup>4</sup> since volunteers may have contact with CBP or ICE detainees in holding facilities. Specifically, the PREA Form collects answers from applicants to the following four questions:

- Have you ever engaged in sexual abuse in a prison, jail, holding facility, community confinement facility, juvenile facility, or other institution as defined in 42 U.S.C. § 1997?
- Have you ever been convicted of engaging or attempting to engage in sexual activity facilitated by force, overt or implied threats of force, or coercion?

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<sup>2</sup> SharePoint is a web-based collaborative platform that integrates with Microsoft Office. It is primarily used as a document management and storage system, but the product is highly configurable and usage varies between organizations. Only DHS personnel can access DHS SharePoint sites. For more information on SharePoint, see <https://www.aiim.org/What-is-Microsoft-Sharepoint>.

<sup>3</sup> Additionally, this SharePoint site contains a secure area that houses PII submitted by applicants. This portion of the site is discussed later in this PIA.

<sup>4</sup> 34 U.S.C. § 30301 et seq.



- Have you ever been convicted of engaging or attempting to engage in sexual activity where the victim did not consent or was unable to consent or refuse?
- Have you ever had a civil or administrative adjudication against you for engaging in activity described in questions 1 through 3 above?

Pursuant to the PREA, any applicant that provides an affirmative answer to any of the above questions will be ineligible for contact with individuals in detention facilities, and thus will not likely be accepted for a volunteer position with the DVF.

The PREA form also contains a Privacy Notice describing the authorities, principal purpose, routine uses, and impact of refusal to provide the information requested.

### *DVF Registration Form*

The purpose of the DVF Registration Form is to collect information required to process the employee's volunteer application, to conduct vetting checks of the employee, and to collect PII that is used to track the employee while deployed. The form collects the following:

- Full Name
- Home Address
- Alternate Phone
- Component
- Duty Location
- Job Series
- Grade
- FLSA (Federal Labor Standards Act Exempt/Federal Labor Standards Act Nonexempt)
- Supervisor (Y/N)
- Work Email
- Work Phone
- Work Cell
- Area(s) of Interest (attorney, meal distribution, health care provider CBP, health care provider ICE, transportation, hospital watch, personal property management)
- Law Enforcement Officer (Y/N)
- Supervisor's Approval (Y/N)
- Government Travel Card (Y/N)



- Willing to Travel (Y/N)
- Read Health Threat Assessment of Border Region (Y/N)

Like the DVF Authorization Form and the PREA Form, the DVF Registration Form contains a Privacy Notice describing the authorities, principal purpose, routine uses, and impact of refusal to provide the information requested. The form also contains a security notice explaining that applicants will be vetted to ensure: 1) a current background investigation that meets the requirements of the position to which they are applying/volunteering, 2) compliance with the Prison Rape Elimination Act, and 3) professional licenses, as applicable. Additionally, the security notice informs applicants that the results of the investigation may be shared with the applicant's home agency.<sup>5</sup>

### *Information Sharing and Recordkeeping*

OCHCO stores completed DVF Authorization Statements, DVF PREA Forms, and DVF Registration Forms of DHS applicants in a secure area of the DVF SharePoint site. Additionally, OCHCO collects relevant information about applicants from these documents, compiles it, and stores it in a secure database on the site. The database, the forms, and any other application materials are generally accessible to a small number of OCHCO Site Collection Administrators, to a small number of OCHCO Communications personnel responsible for site content and certain audit and recordkeeping functions, and to select members of the VFCC who support the vetting and deployment process. Filtered role-based access to the database is also provided to a small number of individuals in ICE and CBP, as well as to all DVF Component Coordinators.<sup>6</sup> When ICE and CBP personnel access the database, the view automatically filters such that only information about applicants who are seeking to support their particular Component are visible.<sup>7</sup> Similarly, Component Coordinators are only able to view information about DVF applicants employed by their Components.

### Application Process for non-DHS Employees

To solicit applications from employees at non-DHS federal agencies, OCHCO relies on USAJOBS,<sup>8</sup> which is a federal shared service<sup>9</sup> managed by the U.S. Office of Personnel Management

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<sup>5</sup> This same security notification also appears on the DVF SharePoint site itself.

<sup>6</sup> DVF Component Coordinators are select individuals at each Component responsible for providing approval for volunteers to deploy. Their role is to ensure that applicants who already have approval from their supervisor to deploy also have general concurrence from relevant leadership at their Component.

<sup>7</sup> *i.e.*, attorneys and medical staff for ICE, all other categories of applicants for CBP.

<sup>8</sup> USAJOBS is the U.S. Government's official source for federal jobs and employment information. It provides OPM-approved federal agency human resources (HR) specialists the ability to create and advertise government jobs, source candidates for employment consideration, and manage the recruiter hiring process through a web interface. USAJOBS also provides job seekers the ability to create and advertise their resumes, search government jobs, and apply for a job directly through the web interface. For more information about USAJOBS, including its privacy implications, see the USAJOBS PIA, available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/usajobs.pdf>.

<sup>9</sup> A shared service is a business or mission function that is provided for consumption by multiple organizations within or between federal agencies. The goal of shared services is to efficiently aggregate resources and systems to improve the quality, timeliness, and cost effectiveness of service delivery to customers. For more information about federal shared services, see <https://www.cio.gov/assets/files/sofit/02.04.shared.services.pdf>.



(OPM). OCHCO posts separate announcements on USAJOBS for each of the separate volunteer functions defined in Secretary Nielsen's memorandum.

As part of their initial USAJOBS application, non-DHS employees are required to submit the same DVF Authorization Statement as DHS applicants.<sup>10</sup> If the DVF Authorization Statement indicates the required supervisory approval, and the candidate successfully answers all of the eligibility and assessment questions for the position in USAJOBS,<sup>11</sup> the applicant is put into an onboarding status in the system. The onboarding status triggers USAJOBS to reach back to the candidate with instructions to complete and submit the same PREA Form required for DHS applicants. Applicants are also directed at this stage to enter all information required to complete a DHS 11000-05 Personnel Security Data Verification Request form into the system in preparation for a vetting check. This includes SSN and date of birth (DOB). Once the information is entered, it automatically populates an electronic 11000-05 form that is stored in a location on USAJOBS only accessible to the ICE and CBP employees responsible for conducting the vetting checks and to select members of the VFCC who directly support the vetting process.<sup>12</sup>

Unlike the application requirements for DHS employees, DVF Registration Forms are not required of non-DHS applicants since all of the information collected on that form is already covered in the eligibilities and assessment questions on the USAJOBS announcements.

All required application materials and forms are stored in USAJOBS in accordance with OPM records retention practices. As with the DVF SharePoint site, permissions for DVF stakeholders in USAJOBS are role-based. ICE and CBP personnel are only able to access the individual applicant's information seeking to support their Component; and agency representatives are only able to access the individual applicant's information employed by their agency.

The same Privacy Notice and security notice that appears on the DVF Registration Form for DHS applicants also appears on each USAJOBS announcement for the DVF.

### Applicant Vetting

Both DHS and non-DHS applicants are initially screened to ensure they have the necessary approvals from their supervisor on the DVF Authorization Statement and that they do not self-report any prohibited behavior on the DVF PREA Form. If the applicant successfully passes this initial screening, members of the VFCC reach out to the applicant's Component Coordinator, or to a DVF

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<sup>10</sup> As with DHS applicants, non-DHS applicants unable to demonstrate supervisory authorization on the DVF Authorization Form, or who answer affirmatively to any of the questions on the PREA Form, are removed from further consideration.

<sup>11</sup> The eligibility and assessment questions are tailored to the specific function advertised and are subject to change over time. Generally, the questions are designed to collect the same information collected from DHS applicants in the DVF Registration Form.

<sup>12</sup> CBP security personnel are only able to view 11000-5 forms for volunteers applying to support CBP and ICE security personnel are only able to view 11000-5 forms for volunteers applying to support ICE.



representative at the applicant's agency in the case of a non-DHS applicant, for additional concurrence that the applicant's leadership also supports the detail sought.

Applicants who receive concurrence from their Component or agency are subject to a criminal vetting check to ensure they meet the suitability and security requirements for the position to which they are applying.<sup>13</sup> The vetting checks are conducted by the Office of Professional Responsibility (OPR) in either CBP or ICE, depending on which of these Components the volunteer applied to support. In addition to the criminal vetting check, ICE and CBP validate the possession of any professional licenses required for specific volunteer roles.<sup>14</sup>

Name, Social Security number (SSN), date of birth (DOB), and current home address are collected from applicants to conduct the vetting checks. For DHS applicants, this information is collected by OCHCO's Strategic Workforce, Planning, and Analysis (SWPA) division from OCHCO's Enterprise Integration Environment (EIE).<sup>15</sup> The information is then stored in the secure database on the DVF SharePoint site. Only CBP and ICE OPR personnel responsible for conducting the vetting checks, VFCC members who directly support the vetting process, and a small number of SharePoint site administrators are able to view SSN and DOB within the database. For non-DHS applicants, the information is collected as part of the USAJOBS application in the manner described above.

CBP OPR conducts its criminal vetting checks using its Automated Targeting System (ATS).<sup>16</sup> ICE OPR conducts its criminal vetting checks using the Federal Bureau of Investigation's (FBI) National Crime Information Center (NCIC).<sup>17</sup> Results of the vetting checks, including any derogatory information, are stored in ATS for applicants pursuing volunteer positions with CBP and in the Integrated Security Management System (ISMS)<sup>18</sup> for applicants pursuing volunteer positions with ICE. Once a vetting check is complete, ICE or CBP informs the VFCC whether the applicant

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<sup>13</sup> Some of the suitability criteria for DVF roles in support of ICE and CBP are unique to those roles.

<sup>14</sup> ICE attorney positions require an active bar license; ICE and CBP health care positions require an unrestricted medical license to practice their discipline and a certification in basic life support for healthcare providers; CBP High Capacity Transport positions require a valid commercial driver's license with passenger endorsement. The DVF completes this check by reaching back to the issuing organization directly.

<sup>15</sup> EIE is a collection of hardware, software, and online data storage that supports the business and information needs of OCHCO. The system serves as a consolidated authoritative source of human capital information across the Department, and it functions as a data broker among all enterprise-level HR systems at DHS. More information about EIE, including its privacy implications, is contained in OCHCO's forthcoming Workforce Analytics and Employee Records PIA, which will be *available at* <https://www.dhs.gov/privacy>.

<sup>16</sup> ATS is a decision support tool that compares traveler, cargo, and conveyance information against law enforcement, intelligence, and other enforcement data using risk-based scenarios and assessments. For more information about ATS, including its privacy implications, *see* DHS/CBP/PIA-006 Automated Targeting System, *available at* <https://www.dhs.gov/privacy>.

<sup>17</sup> ICE OPR directly connects to NCIC via a secure account so no third parties at FBI are involved in the data transmission, data processing, or communication of results.

<sup>18</sup> ICE manually inputs the vetting results into ISMS. For more information about ISMS, please *see* DHS/ALL/PIA-038 Integrated Security Management System (ISMS), *available at* <https://www.dhs.gov/privacy>.



passed or failed. The VFCC then removes the applicant's SSN and DOB from the secure area of the DVF SharePoint site and replaces it with an indicator specifying the applicant's pass/fail status.

Applicants who pass the vetting check are notified of their eligibility to deploy. Applicants who fail the vetting check are notified of their ineligibility and the reasons for the denial may be shared with the applicant's Component or home agency.

## Deployment

Volunteers who are selected are required to complete online training regarding compliance with the PREA prior to deployment.<sup>19</sup> Once complete, the applicant is transported to his or her deployment site to undergo additional training specifically related to his or her volunteer duties. During this training, volunteers are issued user accounts in FEMA's Deployment Tracking System (DTS)<sup>20</sup> and tracked therein. DTS provides volunteers with deployment orders and allows them to manage deployment information through the DTS Responder portal. The VFCC also uses DTS to track and monitor all deployed personnel for safety and security purposes, as well as to conduct historical staffing analyses to improve the efficacy of its response efforts.

The following PII, taken from the DVF Registration Form for DHS volunteers and from USAJOBS for non-DHS volunteers, is uploaded into DTS.

- Full name
- Position
- Agency
- Border Support Personnel (Y/N)
- Supervisor (Y/N)
- Grade
- Job Series

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<sup>19</sup> The training, titled *IS-990: Preventing and Addressing Sexual Abuse and Assault of Individuals in CBP Holding Facilities*, is available online via FEMA's Emergency Management Institute (EMI). To log into the system, users must have a FEMA Student Identification (SID) number, which is a unique number generated and assigned to anyone who needs to take training provided by FEMA. To register for a SID, users must provide their full name, work email, work phone, DOB, city/state/country of birth, three security questions and answers, and a user password. The SID registration site contains a Privacy Notice explaining purpose, routine uses, and impact of refusal to provide the information requested.

<sup>20</sup> The primary purpose of DTS is to assign and track disaster response and recovery personnel deployed under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121. For more information about DTS, including its privacy implications, see DHS/FEMA/PIA-040(a), available at <https://www.dhs.gov/privacy>. DTS also supports the DHS Surge Capacity Force. If an incident exceeds the capacity of the FEMA disaster workforce, the Secretary is authorized to activate the DHS Surge Capacity Force to augment the federal response to a catastrophic disaster. The force is composed of federal employees from DHS and other agencies.



- Work Email
- Status (active/inactive/term)
- Hire Date (to DVF)
- Organization Code
- City
- State
- Supervisor Email

DTS deployment records also indicate whether a volunteer is exempt or non-exempt from the Federal Labor Standards Act (FLSA).<sup>21</sup> This information is collected from EIE for volunteers employed by DHS and from agency representatives for volunteers employed by other agencies.

Additionally, an emergency contact name and phone number, collected directly from the volunteer via the DTS Responder portal, is also stored in the system.

DTS data is accessible to a small team of FEMA employees who manage the system and help with deployment logistics. These employees also periodically issue deployment reports from the system to ICE and CBP. The reports list volunteer names, titles, duty station locations, last accountability dates, and whether they are overdue for an accountability check. Additionally, FEMA periodically sends ICE and CBP aggregate reports communicating how many volunteers are detailed to each deployment site.<sup>22</sup>

## **Section 1.0 Authorities and Other Requirements**

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

The DHS Volunteer Force is carried out through, and under the rules governing, employee details and assignments. Intra-agency details are authorized, generally, under 5 U.S.C. § 3341. As a general rule, details between agencies, or between organizational units within an agency, must be on a reimbursable basis. Unless another statute specifically provides for reimbursable details, the authority for a reimbursable detail is the Economy Act, 31 U.S.C. § 1535.

The authority for CBP and ICE OPR to conduct criminal vetting checks of DVF applicants and share the information with the applicant's home agency or Component is provided by 5 U.S.C. § 3301, which provides authority to the president to ascertain the fitness of executive branch applicants as to age, health, character, knowledge, and ability for employment sought; by Executive Order

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<sup>21</sup> 29 U.S.C. § 201 *et seq.*

<sup>22</sup> Component Coordinators and agency representatives can also request aggregate accountability reports of DVF volunteers employed by their agency or Component.



13467, which requires that background investigations and adjudications be mutually and reciprocally shared and accepted by all agencies; and by 5 U.S.C. § 9101, which requires criminal justice agencies, including DHS, to make available all criminal history record information to other agencies when determining eligibility for appointment, retention, or assignment to a position of public trust, or when conducting a basic suitability or fitness assessment for federal employees.

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

Information collected, maintained, used, and disseminated by DHS on DVF applicants and volunteers is covered by the following SORNs:

- DHS/ALL-014 Department of Homeland Security Personnel Contact Information,<sup>23</sup> which covers DHS workforce accountability to support DHS all-hazards emergency response deployments and exercise and to contact designated persons in the event of an emergency;
- DHS/ALL-023 Department of Homeland Security Personnel Security Management,<sup>24</sup> which covers the collection and maintenance of records that pertain to personnel security management; and
- OPM/GOVT-1 General Personnel Records,<sup>25</sup> which covers general personnel records.

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

Yes. The DVF SharePoint site is covered by the DHS SharePoint as a Service system security plan, which was published on October 9, 2018. Its current Authority to Operate expires August 23, 2020.

The FEMA DTS system security plan was published on July 20, 2018. Its current Authority to Operate expires September 13, 2019.

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

The NARA General Records Schedule (GRS) 2.0 Human Resources series and 5.0 General Operations Support Series cover all of the categories of information retained as part of the DVF program. Specifically, the following General Records Schedules apply:

- Individual Employee Records: GRS 2.2, item 010 (DAA-GRS-2017-0007-0001);

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<sup>23</sup> DHS/ALL-014 Department of Homeland Security Personnel Contact Information, 83 FR 11780 (March 16, 2018).

<sup>24</sup> DHS/ALL-023 Department of Homeland Security Personnel Security Management, 75 FR 8088 (February 23, 2010),

<sup>25</sup> OPM/GOVT-1 General Personnel Records, 77 FR 73694 (December 11, 2012).



- Security Administrative Records: GRS 5.6, item 010 (DAA-GRS-2017-0006-0001); and
- Personnel Security Investigative Reports: GRS 5.6, item 171 (DAA-GRS-2017-0006-0023).

**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 DVF is not subject to the PRA because information is only collected from federal employees and not from the general public.

## Section 2.0 Characterization of the Information

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

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

The DVF Authorization Statement that is required of DHS and non-DHS DVF applicants collects the following:

- Applicant full name
- Applicant supervisor full name
- Applicant supervisor work phone
- Supervisor concurrence/non-concurrence
- Reason for non-concur, if applicable

The DVF PREA Form that is required of DHS and non-DHS DVF applicants collects the applicant's full name and answers to the following four questions:

- Have you ever engaged in sexual abuse in a prison, jail, holding facility, community confinement facility, juvenile facility, or other institution as defined in 42 U.S.C. § 1997? (Y/N)
- Have you ever been convicted of engaging or attempting to engage in sexual activity facilitated by force, overt or implied threats of force, or coercion? (Y/N)
- Have you ever been convicted of engaging or attempting to engage in sexual activity where the victim did not consent or was unable to consent or refuse? (Y/N)



- Have you ever had a civil or administrative adjudication against you for engaging in activity described in questions 1 through 3 above? (Y/N)

The DVF Registration Form that DHS applicants to the DVF are required to complete and submit through the DVF Registration portal on the DVF SharePoint site collects the following:

- Full Name
- Home Address
- Alternate Phone
- Component
- Duty Location
- Job Series
- Grade
- Supervisor (Y/N)
- Work Email
- Work Phone
- Work Cell
- Area(s) of Interest (attorney, meal distribution, health care provider CBP, health care provider ICE, high capacity transportation, hospital watch, personal property management)
- Law Enforcement Officer (Y/N)
- Federal Arrest Authority (Y/N)
- Supervisor's Approval (Y/N)
- Government Travel Card (Y/N)
- Willing to Travel (Y/N)
- Read Health Threat Assessment of Border Region (Y/N)
- Earliest Date to Deploy (choose date on calendar)

The job questionnaires that non-DHS applicants to the DVF are required to complete and submit through USAJOBS collects the following:

- Full Name
- Current Federal Agency (drop down)



- Work Email
- Government Travel Card (Y/N)
- Locations where volunteer is willing to serve (check boxes)
- Lowest grade volunteer is willing to accept (drop down)
- Current Federal Employee (Y/N)
- Supervisor signed DVF Authorization Statement (Y/N)
- Willing to Travel (Y/N, all functions except ICE Attorney)
- Vaccinations up to Date (Y/N, all functions except ICE Attorney)
- Graduate of Accredited Law School and Member in Good Standing of State Bar (Y/N, ICE Attorney only)
- Reside Within Commutable Distance of ICE OPLA Location (Y/N, ICE Attorney only)
- Unrestricted Medical License (Licensed Practical Nurse/Licensed Vocational Nurse/Nurse Practitioner/Physician Assistant/Physician/Registered Nurse, ICE and CBP Health Care only)
- Basic Life Support Certification (Y/N, ICE and CBP Health Care only)
- Travel card and Concur account (Y/N, Hospital Watch/Detainee Support/High Capacity Transport only)
- Positions individual is willing to accept:
  - Distribution of Meals (Y/N, CBP Detainee Support only)
  - Personal Property Management (Y/N, CBP Detainee Support only)
  - Fifteen Minute Welfare Checks (Y/N, Detainee Support only)
- Job series you want to be considered for (0301/1801/both, Detainee Support only)
- Commercial Driver's License with Passenger Endorsement (Y/N, CBP Transport only)
- Licensed to Operate Vans and Buses (Y/N, High Capacity Transport only)
- Current Job Series (text box, High Capacity Transport only)
- Authorized to Carry Firearm (Y/N, High Capacity Transport only)
- Arrest Authority (Y/N, High Capacity Transport only)



OCHCO also collects SSN and DOB from applicants who pass an initial screening for purposes of conducting vetting checks. This information is taken from EIE for DHS applicants and is collected directly from non-DHS applicants via USAJOBS once they pass an initial screening to confirm their answers on the job questionnaire are adequate, their supervisor has indicated support on the DVF Authorization Statement, and their agency leadership has also concurred with the detail assignment.

The VFCC enters the following information from the DVF Registration Form for DHS volunteers, and from USAJOBS for non-DHS volunteers, into the DTS system:

- Full name
- Position
- Agency
- Border Support Personnel (Y/N)
- Supervisor (Y/N)
- FLSA (Federal Labor Standards Act Exempt/Federal Labor Standards Act Nonexempt)
- Grade
- Job Series
- Work email
- Status (active/inactive/term)
- Hire date (to DVF)
- Organization code
- City
- State
- Supervisor email

Additionally, selected volunteers are required to enter the name and phone number of an emergency contact into the DTS Responder portal in preparation for deployment.

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

The sources of information for the DVF consist of information collected from applicants during the application process and in preparation for deployment to the field. Specifically, the information is collected via the DVF Authorization Statements and DVF PREA Forms required of all applicants, the DVF Registration Form required of DHS applicants, USAJOBS job questionnaires



required of non-DHS applicants, additional information OCHCO collects about DHS applicants from EIE in preparation for vetting checks, additional information collected from non-DHS applicants via USAJOBS in preparation for vetting checks, and emergency contact information collected from selected volunteers via the DTS Responder portal.

### **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. Data used to process volunteers into the DVF consists of personnel and organization information regarding federal employees that is primarily collected directly from them. In the case of DHS applicants, some required personnel and organization information is collected from EIE, which is an OCHCO-managed personnel database only available to a small team of OCHCO employees who manage certain workforce analytics and employee records functions. None of the PII used by the DVF is obtained from commercial sources or publicly available data.

### **2.4 Discuss how accuracy of the data is ensured.**

Much of the information provided by applicants is verified during vetting checks, including information contained on the DVF PREA Forms, certain information provided on the DVF Registration Forms, certain information provided in USAJOBS, and all required licenses and certifications. Information provided on the DVF Authorization Statements as to whether an applicant's supervisor concurs is verified when the VFCC seeks additional concurrence from DVF Component Coordinators in the case of DHS applicants, or from DVF agency representatives in the case of non-DHS applicants. Incorrect personal information provided by applicants that is necessary to process them into the program becomes apparent to the VFCC when setting up necessary administrative and support processes, and in these cases the VFCC reaches back to the applicants to correct the information.

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

**Privacy Risk:** There is a risk that DHS collects more information than is necessary to register employees into the DVF or to properly track them once deployed.

**Mitigation:** DHS mitigates this risk by collecting PII based on the type of volunteer function sought by each individual applicant, as well as whether the individual is already deployed. Once deployed, additional PII may be necessary to guarantee the safety of volunteers and to notify their emergency contacts in the event of a personal emergency. All information is collected directly from applicants or from information sources that are already proven as a means of properly processing administrative functions in the applicant's home Component or agency. Information necessary to ensure suitability and security requirements is validated during vetting checks. If an applicant is



considered ineligible or withdraws his or her application during any stage of the application process, no further information is collected.

**Privacy Risk:** There is a risk that the VFCC may inaccurately enter or collect erroneous information about DVF applicants and volunteers.

**Mitigation:** This risk is mitigated. Any inaccurate information collected during registration for purposes of processing volunteers into the program will become evident during vetting checks or when administrative processes are instituted. In these cases, the VFCC reaches back to the applicant in order to effectively run the vetting check or to correctly process the administrative function. Deployed personnel can correct any inaccurate data within DTS using the DTS Responder portal.

## Section 3.0 Uses of the Information

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

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

DHS uses the information provided by applicants to evaluate their suitability to serve in the DVF and to process selected applicants into the program. Brief biographical and personnel data regarding DHS applicants is stored in a secure area of the DVF SharePoint site, while the same type of information for non-DHS applicants remains in USAJOBS. DHS uses SSN and DOB to verify applicants' identities and to ensure they meet mandatory suitability and security requirements for the positions they seek. Once the vetting checks are complete, SSN and DOB are removed from the DVF SharePoint site and replaced with an indicator specifying their suitability. DHS uses the information stored in DTS to issue deployment requests and track volunteers for safety, security, and accountability purposes.

### 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. The DVF does not engage in workforce analytics or any other activities designed to discover or locate predictive patterns or anomalies.

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

Yes. Members of the VFCC, which consists of volunteers across DHS who are supported by subject matter experts from CBP, ICE, FEMA, OCSO, OGC, OPA, and OCHCO are co-located in a single office and share information as part of their joint responsibility to evaluate applications, process successful applicants into the program, and track volunteers during deployment. Additionally, the DVF SharePoint site, which stores application materials and brief biographical and personnel data



regarding DHS applicants and volunteers, provides filtered access on a need-to-know basis to members of the VFCC and to a small number of individuals in OCHCO, ICE, CBP, and to DHS Component Coordinators. Furthermore, ICE and CBP, as well as select members of the VFCC who directly support the vetting process, are provided access to 11000-5 forms in USAJOBS for non-DHS applicants.

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

**Privacy Risk:** There is a risk that DHS uses the information collected from applicants and volunteers for purposes unrelated to the DVF.

**Mitigation:** This risk is mitigated. DHS restricts access to applicant and volunteer PII to SharePoint administrators, and to individuals on the VFCC who have a need-to-know in order to evaluate DVF applications, process DVF volunteers into the program, or track DVF volunteers once deployed. The access granted to VFCC members in SharePoint, USAJOBS, and DTS is role-based to promote use limitation.

## **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.**

A Privacy Notice describing the authorities, principal purpose, routine uses, and impact of refusal to provide the information requested is prominently displayed on the DVF SharePoint site, the DVF Registration Form, the DVF PREA Form, and each DVF job announcement on USAJOBS. Security statements also appear on the DVF Registration Form and on USAJOBS explaining that vetting checks will be conducted of applicants and the results shared with the applicants' home Components or agencies.

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

Participation in the DVF is completely voluntary and applicants are under no obligation to apply. Applicants can also withdraw their applications at any time if they are not comfortable being the subject of a criminal vetting check or having their information maintained by the VFCC. Additionally, applicants are free to withhold any of the information required during the application process; however, failure to provide requested information will likely result in the applicant not being considered for the program.



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

**Privacy Risk:** There is a risk that applicants and volunteers will not receive notice that DHS is collecting, maintaining, and using their information for purposes of selection, processing, and deployment coordination and accountability.

**Mitigation:** This risk is mitigated. DHS prominently displays Privacy Notices on all application materials collecting PII, on the DVF Registration portal, on USAJOBS announcements, and on the DTS Responder portal. Additionally, DHS makes new volunteers aware during on-site training that their information will be tracked in DTS for safety, security, and accountability. Furthermore, this PIA, and the SORNs listed in Section 1.2, provide notice of DHS's intent to use the PII of applicants and volunteers for selection, processing, and deployment coordination and accountability.

## **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.**

The NARA General Records Schedule (GRS) 2.0 Human Resources series and 5.0 General Operations Support Series cover all of the categories of information retained as part of the DVF program. Specifically, the following General Records Schedules apply:

- Individual Employee Records: GRS 2.2, item 010 (DAA-GRS-2017-0007-0001) and item 040 (DAA-GRS-2017-0007-0004);
- Administrative Records Maintained in any Agency Office: GRS 5.1, item 010 (DAA-GRS-2016-0016-0001); and
- Personnel Security Investigative Reports: GRS 5.6, item 171 (DAA-GRS-2017-0006-0023).

GRS 2.2, item 010, directs agencies to destroy records on routine office program support, administration, and human resources operations when three (3) years old, but longer retention is authorized if required for business use. Accordingly, general personnel information collected to evaluate applications and process volunteers into the program is maintained in the DVF SharePoint site for a period of three (3) years after an applicant ends volunteer service with the DVF. Personnel data in USAJOBS is maintained in accordance with OPM policy.

GRS 5.6, item 010, directs agencies to destroy records pertaining to personnel security program administration, including status reports on cleared individuals, when three (3) years old, but longer retention is authorized if required for business use. SSN and DOB collected for the purpose of conducting vetting checks are removed from the secure area of the DVF SharePoint site as soon as the checks are complete, and they are replaced with an indicator specifying whether the applicant



passed. This indicator is maintained for a period of three (3) years after the applicant ends volunteer service with the DVF in accordance with the GRS. Similarly, SSN and DOB are removed from the DVF SharePoint site if an applicant decides to withdraw after providing the information but before the vetting check is conducted. GRS 5.6, item 171, directs agencies to destroy reports and records created by agencies conducting investigations under delegated investigative authority in accordance with that delegated authority agreement or memorandum of understanding.

The DVF PREA Forms, also used in security vetting of applicants, are maintained for a period of seven (7) years after the volunteer ends DVF service in accordance with the business use exception of the GRS, since this retention period is necessary to comply with PREA audit requirements.

Currently, FEMA is treating DTS inputs and any associated outputs as permanent records, until appropriate schedules can be identified and written.

## 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that DHS retains PII longer than is necessary and relevant.

**Mitigation:** This risk is mitigated. The VFCC removes volunteer PII, including all application materials except the DVF PREA Forms, from the DVF SharePoint site three (3) years after the date of collection, or in the case of applicants who are selected, three (3) years after their deployment ends. Similarly, the DVF PREA Forms are removed seven (7) years beyond the date they were completed, or in the case of applicants who are selected, seven (7) years after the date their deployment ends.

If an applicant fails to meet suitability requirements or fails the vetting check, SSN and DOB are replaced with an indicator that the individual did not pass and no further information is collected. If an applicant is ineligible due to an affirmative answer on the PREA Form, all of his or her information is removed except for the PREA Form itself, which is retained for the seven (7) year retention period in compliance with PREA requirements. If an applicant withdraws his or her application prior to onboarding, the information submitted thus far is retained for the records retention period in case the applicant decides to reapply.

SPII (*i.e.*, SSN and DOB) is removed from the secure area of the DVF SharePoint site once the vetting checks are complete for applicants and replaced with an indicator specifying whether the applicant passed or failed. However, because DHS does not manage the USAJOBS system, it cannot control how OPM maintains that information.



## 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.**

The VFCC provides Components and agencies with the names and job titles of all applicants employed by them who have received supervisory approval on the DVF Authorization Statement. This information is shared with the applicant's Component Coordinator or DVF agency representative to ensure the organization's leadership also concurs with a volunteer deployment. Additionally, the VFCC shares the results of vetting checks conducted on non-DHS applicants with home agencies in accordance with Executive Order 13467 and 5 U.S.C. § 9101. Furthermore, DHS shares information related to a volunteer's health and safety with that volunteer's emergency contact in the event of a personal emergency.

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

The use of records in the program require sharing with emergency contacts and home employing agencies, as those persons and entities are necessary to the efficient operation of the program and part of approving the operation, respectively. Routine use M of OPM/GOVT-1 permits the disclosure to other federal agencies of information in connection to the hiring of any employee, the issuance of a security clearance or determination concerning eligibility to hold a sensitive position, and the conducting of any investigation for purposes of credentialing, national security, fitness, or suitability adjudications. Accordingly, DHS shares the results of suitability determinations with home agencies; and it shares the name and job titles of applicants with representatives at their employing agencies to obtain concurrence on the volunteer assignments sought.

Routine use J of DHS/ALL-014 permits the sharing of information with emergency contacts of current and former DHS personnel, as well as current and former federal employees who participate in exercises or who respond to all-hazards emergencies, including manmade emergencies. Accordingly, the VFCC shares information with emergency contacts provided by volunteers in the event of a personal emergency.

Routine use H of DHS/ALL-023 permits the sharing of information with other federal agencies if the information is relevant and necessary to a requesting agency's decision concerning the hiring or retention of an individual, or if the information is relevant and necessary to a DHS decision concerning the hiring or retention of an employee. Accordingly, DHS shares the results of vetting checks with applicants' home agencies.



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

No restrictions are placed on re-dissemination of PII shared with an applicant's or volunteer's home agency, since that agency is bound by the same privacy rules and regulations already in force with regard to its employees, including the Privacy Act and relevant SORNs. DHS also does not restrict the re-dissemination of information provided to emergency contacts since that information may need to be shared with family members, medical providers, and others with fiduciary responsibilities to the volunteer.

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

The VFCC records the sharing of applicant names and job titles with home agencies to document the completion of the process step in its recruitment workflow. Similarly, the VFCC documents the results of vetting checks and whether that information was shared with the applicant's home agency as part of its recruitment workflow. DHS only shares PII with emergency contacts in the event of an emergency. If a volunteer is injured or dies while on deployment, and responder information from DTS is shared with the respective emergency contact, such a disclosure will be logged by the DTS system owner. Additionally, DTS stores an audit log for each time a responder's emergency contact information is accessed.

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

**Privacy Risk:** There is a risk that information pertaining to DVF applications, selections, or deployments could be shared outside of DHS for a purpose that is inconsistent with the original collection of data.

**Mitigation:** This risk is partially mitigated. The only external-to-DHS entities with which the VFCC foreseeably shares DVF information is with an applicant's home agency, with a volunteer's emergency contact, or with the FBI's NCIC system as part of ICE criminal vetting checks. Any sharing of PII with an applicant's home agency pertains to information already in its possession or to information related to vetting checks, the latter of which may be shared under routine use M of OPM/GOVT-1 and routine use H of DHS/ALL-023. Any information shared with emergency contacts pertains to a volunteer's health and safety and is permissible under routine use J of DHS/ALL-014. Information ICE shares with NCIC as part of its vetting checks may be shared under routine use H of DHS/ALL-023. Should a VFCC member share information with a non-DHS entity not in accordance these authorities, it would constitute a privacy violation and would subject the individual to disciplinary action.



## Section 7.0 Redress

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

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

DVF applicants employed by DHS may access their data by contacting their Component's VFCC representative listed on the DVF SharePoint site to request it. DVF applicants not employed by DHS may contact the HR specialist listed on the USAJOBS announcement to which they applied to request it. Deployed volunteers have access to their own data through the DTS Responder portal. Individuals may also access their information via a Privacy Act (PA) or Freedom of Information Act (FOIA) request to the DHS Chief FOIA Officer. The SORNs that cover the DVF provide instructions for initiating PA requests.

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

DHS applicants may contact the VFCC to request correction of any inaccurate information pertaining to them. Non-DHS applicants may contact the HR specialist listed on the USAJOBS announcement to which they applied to correct inaccurate information pertaining to them. All DVF volunteers with a profile in DTS, regardless of citizenship status, can update and correct their stored information through the DTS Responder portal. Individuals who are U.S. citizens may also correct or update their information via a PA request to the DHS Chief FOIA Officer. The SORNs that cover the DVF provide instructions for all PA redress.

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

DHS applicants are provided the names, work email addresses, and work phone numbers of VFCC members representing their home Component and are instructed to contact them with any questions or concerns. This contact information is provided on the DVF SharePoint site that employees may access for information about the program, and that they must access to apply. Non-DHS applicants are provided the name, work email address, and work phone number of the HR specialist responsible for processing their applications on USAJOBS. Additionally, DHS provides notice of redress in DTS directly to DTS account holders during their initial deployment orientation, as well as during subsequent training courses. Furthermore, all DTS account holders have access to correct their own data within DTS.

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

**Privacy Risk**: There is a risk that individuals will not be aware that they may access and



correct any information contained in their application materials, in the applicant database maintained within the secure area of the DVF SharePoint site, in USAJOBS, or in DTS.

**Mitigation:** This risk is mitigated. DHS applicants are provided contact information of VFCC members representing their home Component on the DVF Registration portal on SharePoint, and they are instructed to contact these individuals with any questions or concerns. This information is continuously accessible to all DHS employees by clicking a link to the DVF homepage on the DHS Intranet homepage. Non-DHS applicants are given the contact information of the HR specialist responsible for processing their applications on the USAJOBS site that they must access in order to apply. This information is continuously accessible to applicants, even after the job announcement closes, by revisiting the USAJOBS site and accessing the area that links them to job announcement to which they already applied. There is no risk of redress regarding DTS because all individuals may access and correct any records pertaining to them in the system. Moreover, DTS account holders are provided notice of redress during their initial deployment orientation, as well as during subsequent training.

**Privacy Risk:** There is a risk that there is no redress mechanism for individuals who are denied a volunteer opportunity with the DVF.

**Mitigation:** This risk is not mitigated. There is no appeal process if an individual is denied a volunteer opportunity with the DVF. ICE and CBP are not taking suitability actions, but rather are making simple vetting determinations as to whether the person can volunteer/detail with ICE or CBP. The suitability determination of an individual still remains with that individual's home agency. ICE and CBP cannot take any "adverse action" against an individual from another agency; any action taken by that individual's agency, based on the information shared by the DVF, will go through that agency's own process and procedures.

In terms of DHS personnel redress, each individual may address and provide mitigating information related to any derogatory information that is identified as part of his or her suitability. Subjects are notified of any pending actions based on derogatory information and are provided a mechanism to provide information. If a derogatory finding is made, individuals have appeal rights, and also the ability to request information regarding their case via a PA or FOIA request to the DHS Chief FOIA Officer.<sup>26</sup>

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<sup>26</sup> For more information about redress procedures for DHS personnel regarding suitability determinations, please see DHS/ALL/PIA-038 Integrated Security Management System (ISMS), available at <https://www.dhs.gov/privacy>, and DHS/ALL-023 Department of Homeland Security Personnel Security Management, 75 FR 8088 (February 23, 2010),



## 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?**

PII contained on the DVF SharePoint site is filtered to ensure those with permissions are only able to see personnel data about which they have a need-to-know. For example, Component Coordinators and DVF agency representatives are only able to access information pertaining to their own employees, ICE and CBP are only able to access information on individuals who have applied to support them, and only ICE, OPR, CBP OPR, and a select number of VFCC members who directly support the vetting process are able to access SSN and DOB required to run vetting checks in either the DVF SharePoint site or USAJOBS. Additionally, SharePoint audits and logs all user access to the DVF site. DTS also maintains auditing and accountability logs that are reviewed on a monthly basis for suspicious activity or activity in excess of a user's assigned privileges. Auditing and accountability controls and logs in USAJOBS are managed by OPM.

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

DHS requires privacy and security training of all DHS employees. Additionally, all users with privileged access to any DHS system, including SharePoint and USAJOBS, are required to complete additional role-based privacy and security training in order to obtain their privileges. DHS also protects privacy by using role-based access; employees are granted access to SharePoint, USAJOBS, and DTS only if their program leadership and system managers approve an access request on a need-to-know basis.

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

OCHCO establishes SOPs and guidelines governing use of its SharePoint sites, as does OPM regarding use of USAJOBS, and FEMA regarding use of DTS. Designated SharePoint administrators and DTS personnel determine which DHS employees require access to those systems. Once system administrators confirm a new user's need for access with the appropriate manager, they apply the requested roles to the user's system profile. Functional roles can be restricted based on need-to-know such that users of SharePoint, USAJOBS, and DTS are limited to only that information in the systems pertinent to their particular roles or functions.



## **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?**

CBP and ICE sign MOUs with Components that contribute volunteers to the DVF, and they sign Interagency Agreements (IAA) with non-DHS agencies that contribute volunteers to the DVF. The MOUs and IAAs specify the terms and conditions of the reimbursable details and the relationships between operational control and administrative and management controls of the volunteers. All MOUs and IAAs are reviewed by the VFCC, which includes OCHCO privacy representatives, before being sent to the DHS Office of the General Counsel for formal review.

### **Responsible Officials**

Neil Singh  
Human Capital Business Solutions  
Office of the Chief Human Capital Officer  
Department of Homeland Security

### **Approval Signature**

Original, signed copy on file with the DHS Privacy Office.

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Jonathan R. Cantor  
Acting Chief Privacy Officer  
Department of Homeland Security