



**Privacy Impact Assessment  
for the  
Personnel Futures Program (PFP)  
DHS/TSA/PIA-023(a)  
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## Abstract

The Department of Homeland Security (DHS), Transportation Security Administration (TSA), Personnel Futures Program (PFP), supports the TSA Office of Human Capital in providing comprehensive end-to-end, integrated, and automated human capital services and capabilities for external job candidates as well as a geographically dispersed workforce located at TSA Headquarters, Regional Offices, Federal Air Marshal Service (FAMS) Field Offices, and more than 450 federal airports. This PIA is being conducted because PFP will collect, maintain, and disseminate Personally Identifiable Information (PII) on employees and members of the public who apply for employment at TSA.

## Overview

Under the PFP, TSA is streamlining human capital services and capabilities used to collect, store, process, and disseminate candidate and employee information for the broad spectrum of human capital functions. The PFP will replace the current HRAccess Program, providing comprehensive human capital services and capabilities for TSA applicants and employees. The PFP services and capabilities described below encompass the full lifecycle of the TSA employment process. These services and capabilities are provided by both Government and TSA-authorized service providers. The HRAccess Program PIA will be retired once the PFP is fully implemented.

### **Recruitment and Hiring (R&H)**

TSA's recruitment efforts involve providing comprehensive professional support for all of TSA's recruitment needs – both field and Headquarters positions – including analysis, planning and strategy development, marketing, ad placement in all appropriate media, participation in and coordination of job fairs and other events, and report preparation. TSA is active with a variety of focused recruitment initiatives, including: Veterans, Women, Diversity, Individuals with Disabilities, Student Programs, etc.

TSA hires a large number of personnel each year in order to meet the human capital needs of the agency. Individuals input PII into the TSA application intake systems during the application process. The application intake systems interface with the U.S. Office of Personnel Management (OPM) USAJOBS system<sup>1</sup> and information flows into several systems to establish the new employee's accounts, and to administer and manage the human capital operations of the agency. Those systems include the TSA personnel system; time and attendance system; candidate dashboards that allow applicants to manage their process; and to additional systems such as the Computer Based Testing system or Medical Assessment system (depending on the position applied for). Additionally, candidate information will be sent to the TSA Assessment Platform (TAP)

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<sup>1</sup> See U.S. Office of Personnel Management (OPM) USAJOBS system PIA, available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/usajobs.pdf>.



system to automatically notify the TAP service provider as individuals become eligible for computer-based tests for the position for which they are applying.

All R&H systems and data will be integrated with the TSA Integrated Data Warehouse (IDW), which will house R&H data to generate reports and feed other TSA HR systems to effectively track and manage the agency's recruitment, assessment, hiring, and on-boarding efforts.

The integration consists of four specialized datamarts built to support one subject area. This permits efficient querying of subject specific data (e.g. personnel actions; help desk; personnel, payroll, benefits; recruiting & hiring) to obtain key performance metrics and trending history.

### **Personnel Actions, Payroll, and Benefits (PP&B)**

The PFP will use TSA-authorized service providers, Government staff, and automated solutions to process personnel actions, payroll, and benefits (PP&B) transactions to assist TSA in supporting a diverse, well-qualified workforce. For these functions, TSA will use internal systems, and systems and guidelines provided by the U.S. Department of Agriculture's (USDA) National Finance Center (NFC) under the direction of DHS.

TSA will use NFC to process personnel actions and payroll transactions for TSA personnel. Position, personnel, and benefits changes are provided to NFC whenever employee status changes are approved by TSA, such as hiring actions, promotions, pay increases, transfers, awards, change of benefits, etc. Additionally, time and attendance data is collected for each pay period and used to calculate employee pay. This net pay amount is sent to the U.S. Treasury, which transmits the amount electronically to the employee's designated bank account or mails a paper check to his or her official mailing address. NFC also prepares the Leave and Earnings statement for each employee and posts it on the employee self-service web site, where it can be read and printed by the employee. NFC also sends information from each employee's records to OPM for use in managing the federal workforce.

The PFP will use an online user interface (eOrientation tool) to allow new hires to complete important onboarding forms (e.g., W-4 Tax Withholdings, Direct Deposit, Health Benefits, Life Insurance, individual state tax forms) and electronically sign and submit them as part of the onboarding process. The eOrientation tool will be integrated with TSA's hiring systems to receive information for this process.

The PFP will use candidate data to perform the online E-Verify process to check each candidate's employment eligibility by comparing information from the candidate's I-9 Form



against the Social Security Administration and DHS U.S. Citizenship and Immigration Services databases.<sup>2</sup>

The PFP will share human capital data externally, in accordance with the Privacy Act, for authorized activities (e.g., providing information to a court in deciding child support, alimony, or garnishment issues; providing information to authorized entities to support the benefits elected by employees such as the Bureau of Public Debt for saving bonds and the Federal Retirement Thrift Investment Board for thrift savings plans; various benefits service providers; and authorized allotments such as the Combined Federal Campaign).

All PP&B systems and data will be integrated with the TSA IDW, which will house PP&B data to generate reports and feed other systems to monitor, manage, and report performance, trends, and issues.

### **TSA Assessment Platform (TAP)**

As part of the new hire process and professional development of agency employees, a TAP tool will be used to assess candidate and employee knowledge, skills, abilities, and competencies necessary to carry out assigned duties. These computer-based tests are comprised of questions drawn from TSA's Standard Operating Procedures, guidance, training curriculum, and other relevant materials. The TAP system will offer a library of assessments that can be readily accessed and administered, and will also have the capability to administer TSA or third-party custom-developed assessments.

The TAP system will be integrated with TSA hiring systems and the TSA Learning Management System (LMS).

### **Human Resources Information Technology (HRIT) Systems**

In addition to the specific elements of IT that have been referenced above, TSA is leveraging legacy investments in IT Systems for continued use by the agency. These systems include Request for Personnel Action (RPA), Employee Relations Case Management, Integrated Data Warehouse (IDW), Integrated Hiring Solution (IHS), and Offer Management Interface (OMI). These applications mainly rely on Commercial Off the Shelf (COTS) programs that have been configured for TSA's use.

RPA – is a roles based workflow engine used to request, route for approval, and record personnel actions on a Standard Form 52 (SF52) Request for Personnel Action.

Employee Relations Case Management – Separated from other applications due to the sensitive nature of the information, the system supports case creation, tracking, and management. Users include Office of Professional Responsibility (OPR), Employee Relations (ER), Office of

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<sup>2</sup> See DHS/USCIS/PIA-030 E-Verify PIA and subsequent updates, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



Inspection (OOI), and the National Resolution Center (NRC). The system stores all necessary evidence to support the case outcome.

IDW – A repository of current and historical data from areas of TSA HR operations. The system supports generating unique reports. Supports the operations of other applications through the retrieval and storage of data elements.

IHS – A business rules and workflow engine that accesses and stores candidate data and manages the TSA job candidate data from receipt of application to final job offer.

OMI – Automates the hiring process for Management, Administrative, and Professional (MAP), FAMS, or executive candidates. It includes the salary tool and allows the sending of standardized job offers.

### **Customer Service Center (CSC)**

The PFP will implement a Customer Service Center (CSC) to assist TSA employees and candidates with human capital inquiries regarding recruitment, job application and hiring process, hiring, orientation, onboarding, employee benefits changes, payroll, time and attendance, basic retirement, employee performance management, promotions, background and security checks, reassignments, assessments, personnel transactions, and separation of employment. The CSC will also assist TSA employees and candidates with password resets and system troubleshooting for TSA's HR systems. The CSC will deploy a full complement of systems (e.g., case management tracking system, phone, Interactive Voice Response (IVR), chat, analytics, fax, reporting) that can be used by authorized service providers and Government staff for customer service operations.

TSA will collect employee and candidate information in order to properly open, track, monitor, manage, and close CSC inquiries. This information will reside in the CSC case management tracking system.

All CSC systems and data will be integrated with the TSA IDW, which will house CSC data to generate reports and feed other systems to monitor, manage, and report performance, trends, and issues.

In addition, TSA will enter into an agreement with OPM for the purpose of conducting customer satisfaction surveys using OPM's system called USA Surveys. USA Surveys stores name, email address, and survey responses.



## 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?

TSA's general operating authorities are set forth in the Aviation and Transportation Security Act (ATSA) 49 U.S.C. § 114(f). Authority for collecting general personnel record, employee performance file, and medical file data are defined in 5 U.S.C. §§ 301, 1104, 1302, 1303, 2302(b)(10), 2951, 3301, 3321, 3372, 4118, 4305, 5112, 5405, and 8347, and Executive Orders (EO) 9397 as amended by EO 13478, 9830, 10450, and 12107.

DHS has established Service Level Agreements (SLA) with the USDA NFC that provide authority for departmental components, including TSA, to use human capital and payroll/personnel information technology systems to share information to perform agency administration functions.

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

Information collected, stored, and maintained by the PFP are covered by a variety of government-wide, DHS-wide, and TSA-specific SORNs:

- OPM/GOVT-1 General Personnel Records;<sup>3</sup>
- OPM/GOVT-2 Employee Performance File System Records;<sup>4</sup>
- OPM/GOVT-3 Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions, and Termination of Probationers;<sup>5</sup>
- OPM/GOVT-5 Recruiting, Examining, and Placement Records;<sup>6</sup>
- OPM/GOVT-6 Personnel Research and Test Validation Records;<sup>7</sup>
- OPM/GOVT-7 Applicant Race, Sex, National Origin and Disability Status Records;<sup>8</sup>

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<sup>3</sup> See OPM/GOVT-1 General Personnel Records, December 11, 2012, 77 FR 73694.

<sup>4</sup> See OPM/GOVT-2 Employee Performance File System Records June 19, 2006, 71 FR 35342, 35347.

<sup>5</sup> See OPM/GOVT-3 Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions, and Termination of Probationers April 27, 2000 65 FR 24732.

<sup>6</sup> See OPM/GOVT-5 Recruiting, Examining, and Placement Records March 26, 2014 79 FR 16834.

<sup>7</sup> See OPM/GOVT-6 Personnel Research and Test Validation Records June 19, 2006 71 FR 35354.

<sup>8</sup> See OPM/GOVT-7 Applicant Race, Sex, National Origin and Disability Status Records June 19, 2006 71 FR 35356.



- OPM/GOVT-9 File on Position Classification Appeals, Job Grading Appeals, and Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints;<sup>9</sup>
- OPM/GOVT-10 Employee Medical File System Records;<sup>10</sup>
- MSPB/GOVT-1 Appeals and Case Records;<sup>11</sup>
- OGE/GOVT-1 Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records;<sup>12</sup>
- OGE/GOVT-2 Executive Branch Confidential Financial Disclosure Reports;<sup>13</sup>
- DHS/ALL-026 Department of Homeland Security Personal Identity Verification Management System;<sup>14</sup>
- Social Security Administration, Earnings Recording and Self-Employment Income System, Office of Systems: 60-0059;<sup>15</sup>
- DHS/ALL-018 Department of Homeland Security Grievances, Appeals, and Disciplinary Action Records System of Records;<sup>16</sup>
- DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records;<sup>17</sup>
- DHS/TSA-004 Personnel Background Investigation File System;<sup>18</sup>
- DHS/ALL-020 Department of Homeland Security Internal Affairs;<sup>19</sup> and

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<sup>9</sup> See OPM/GOVT-9 File on Position Classification Appeals, Job Grading Appeals, Retained Grade or Pay Appeals, Fair Labor Standard Act (FLSA) Claims and Complaints, Federal Civilian Employee Compensation and Leave Claims, and Settlement of Accounts for Deceased Civilian Officers and Employees, October 1, 2013, 78 FR 60331.

<sup>10</sup> See OPM/GOVT-10 Employee Medical File System Records June 21, 2010 75 FR 35099.

<sup>11</sup> See MSPB/GOVT-1 Appeals and Case Records November 21, 2002 67 FR 70254.

<sup>12</sup> See OGE/GOVT-1 Executive Branch Personnel Public Financial Disclosure Reports and Other Name-Retrieved Ethics Program Records December 9, 2013, 78 FR 73863.

<sup>13</sup> See OGE/GOVT-2 Executive Branch Confidential Financial Disclosure Reports January 22, 2003 68 FR 3097 [correction published May 8, 2003, 68 FR 24722.

<sup>14</sup> See DHS/ALL-026 Department of Homeland Security Personal Identity Verification Management System June 25, 2009, 74 FR 30301.

<sup>15</sup> See SSA/OS, 60-0059, Earnings Recording and Self-Employment Income System (MEF), January 11, 2006 71 FR 1819.

<sup>16</sup> See DHS/ALL-018 Department of Homeland Security Grievances, Appeals, and Disciplinary Action Records System of Records October 17, 2008, 73 FR 61882.

<sup>17</sup> See DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records September 28, 2015, 80 FR 58283.

<sup>18</sup> See DHS/TSA-004 Personnel Background Investigation File System December 10, 2004, 69 FR 71828.

<sup>19</sup> See DHS/ALL-020 Department of Homeland Security Internal Affairs April 28, 2014, 79 FR 23361.



- DHS/TSA-022 National Finance Center (NFC) Payroll/Personnel System.<sup>20</sup>

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

The PFP anticipates completing the Security Authorization process and obtaining Authorities to Operate (ATO) for PFP systems before going operational. System Security Plans will be completed prior to obtaining ATOs.

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

The National Archives and Records Administration (NARA) has approved Government-wide record retention schedules for human capital-related records. TSA PFP records will be retained and disposed in accordance with applicable Government-wide NARA General Records Schedules 1.0 (Finance) and 2.0 (Human Resources). These schedules have varying retention requirements depending on the category of records maintained.

### **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.**

TSA uses a variety of forms in its human capital processes. Many are Government-wide standard forms sponsored by OPM or the General Services Administration (GSA), or are state forms that are not subject to the Paperwork Reduction Act (PRA) (for example, state income tax withholdings). Other forms merely certify identity and are not information collections under the PRA. TSA forms for its employees are not subject to the PRA.

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

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

The PFP will collect, use, disseminate, and maintain human capital-related data and program information (listed below) from TSA employees and candidates for the purpose of facilitating, performing, and managing full lifecycle TSA human capital functions and transactions, including recruitment and hiring activities, background and security investigations, PP&B transactions, employee assessments, customer service, or to administer programs.

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<sup>20</sup> See DHS/TSA-022 National Finance Center Payroll Personnel System, July 17, 2006, 71 FR 40530.



- Full Name;
- Other Names Used;
- Social Security number (SSN);
- Driver's License Number;
- Passport Number;
- Date of Birth;
- Alien Registration Number/Form I-9;
- Gender;
- Copies of Identity Source Documents;
- Eye Color;
- Weight;
- Height;
- Hair Color;
- Home Address;
- Home Phone Number;
- Mobile Phone Number;
- Citizenship;
- Photograph;
- Medical Information;
- Testing Results;
- Financial Information (Account Numbers or Electronic Funds Transfer Information);
- Account Passwords or Personal Identification Numbers (PIN);
- Fingerprint Image;
- Dependent Information;
- Beneficiary Information and Designations;
- Resumes or Other Qualification Documentation;
- Work Address;



- Email address;
- Place of Birth;
- Selective Service Number;
- Veteran Status;
- Employing Organization;
- Salary;
- Pay plan;
- Hours Worked;
- Overtime;
- Compensatory Time;
- Leave Accrual Rate;
- Leave Usage and Balances;
- Civil Service Retirement and Retirement System Contributions;
- FICA Withholdings;
- Federal, State, or City Tax Withholdings;
- Federal Employee Health Benefits Withholdings;
- Garnishments;
- Savings Bond Allotments;
- Union Dues Withholdings;
- Deductions for IRS Levies;
- Thrift Savings Plan Contributions;
- Court Ordered Child Support Levies;
- Court Ordered Alimony;
- Employee Relations Records (e.g., corrective, disciplinary, adverse actions, nature of offense, incident date);
- Federal Salary Offset Deductions;
- Leave Transfer Program Information;



- Leave Bank Program Information;
- Educational Level;
- Specialized Education or Training Obtained Outside the Federal Government;
- Work Experience;
- Personal References;
- Race, Nationality, Origin (Optional); and
- Disability Status (Optional).

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

The PFP will typically collect PII directly from the individual or his or her authorized representative. Other sources of information may include third-party sources such as: courts, healthcare providers, health service organizations, or tax authorities (in appropriate circumstances).

Candidate and employee information will be collected in person, by telephone, in paper form, via electronic forms, by email, or from facsimile. Information will also be collected from electronic input devices such as time clocks, login devices, or security screening devices, which record an individual's entry or departure from work assignments or work areas.

## **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

The PFP may use publicly available data for certain positions when publicly available information may have a bearing on employment suitability. For example, if a news story reported that an employee had been arrested for theft, that information, as well as arrest records, or other public records, might be included in the Employee Relations files as part of what generated discipline or adverse action. If an employee posts inappropriate images on a website affecting the reputation of the agency (such as while in uniform), those images might be retained as part of the disciplinary file.

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

The PFP will collect PII directly from the individual or his or her representative to the greatest extent possible. As such, the likelihood of erroneous PII is minimized. In some instances, TSA must rely on third-party information that may be subjective, such as personal references for which accuracy may not be established.



Data will also be checked for accuracy by human resource specialists, administrative officers, supervisors, managers, other officials, and service providers authorized to review the data. These individuals will notify the affected individual when there appears to be an inaccuracy, and request that the individual correct the data before it is entered into the appropriate systems.

Employees can check their personnel and payroll data by viewing the Statement of Earnings and Leave (SEL), W-2 Forms, or information screens available through the employee self-service system provided by the agency.

Employees may use the web-based OPM Electronic Official Personnel Folder system to view and check official documents, Notification of Personnel Action forms, and associated supporting documents. For security purposes, an individual's personal identification number may be required to view this information.

Information received from a court or tax authority is assumed to be accurate.

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

**Privacy Risk:** There is a risk that information may be mishandled or exposed to unauthorized persons.

**Mitigation:** The PFP will automate many document submission processes, and will use secure information technology processes, procedures, and controls to minimize the opportunity to mishandle PII. Unauthorized release of information will be mitigated through the use of multiple levels of security and personnel training.

Individuals who handle PII and Sensitive Security Information (SSI) will be required to sign DHS Non-Disclosure Agreements (NDA), and will receive initial TSA IT Security Awareness training and privacy training. Individuals will receive refresher training on an annual basis.

Electronic data will be maintained in databases with role-based security to limit access to personnel who have a need to know for the performance of official duties.

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

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

The PFP will use information gathered from individuals to make qualification and hiring decisions, administer and manage pay, benefits, personnel transactions, employee performance, customer service center inquiries, employee assessments, maintain health related information about the individual, maintain other human resource-related information and transactions, and to comply with court orders. The information will also be used to establish a source of official data concerning employment with the agency. Additionally, TSA will use the information to monitor



statistical data to assess the agency's progress in meeting equality and equal opportunity in employment, promotion, and other goals.

TSA will use candidate data to perform the online E-Verify process to check each candidate's employment eligibility by comparing information from the candidate's I-9 form against the Social Security Administration and U.S. Citizenship and Immigration Services Databases.

**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?**

Yes. TSA will use candidate data to perform the online E-Verify check with U.S. Citizenship and Immigration Services.

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

**Privacy Risk:** There is a risk of the information being used for purposes beyond the purpose for which the information was collected.

**Mitigation:** Applicant and employee information may only be used consistent with the purpose for collection or in accordance with the Privacy Act. System access is limited to authorized users who have received annual privacy training, to include the requirement disclosures be limited in accordance with the Privacy Act. Records are used, however, for a broad array of personnel requirements throughout the life-cycle of a Federal employee.

## Section 4.0 Notice

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

Forms that collect personal information contain a Privacy Act Statement. The publication of this PIA and the Privacy Act SORNs listed in Section 1.2 above also serve to provide public notice of the collection, use, and maintenance of this information.



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

Individuals do not have the right to limit the uses of information provided as part of their employment or application for employment. Individuals have the opportunity to decline to provide information requested. Some information such as race and disability status are optional. Failure to provide certain information, or to comply with required medical/drug testing or employee assessments, may affect benefits, rights, and employment. Additionally, failure to provide requested information may delay the process of delivering benefits and personnel actions to the individual, because it might increase the time necessary to identify the individual and verify that the individual is authorized the benefits.

## 4.3 Privacy Impact Analysis: Related to Notice

**Privacy Risk:** There is a risk that individuals will not be aware that their information may be submitted to authorized third-party service providers during the course of human capital operations.

**Mitigation:** In addition to the Privacy Act SORNs, individuals are provided a Privacy Act Statement on forms and online applications, prior to providing information, and may therefore determine if they would like to submit the information. This PIA provides notice that authorized third-party service providers may be used during the course of human capital operations.

## Section 5.0 Data Retention by the project

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

PFP records will be retained and disposed in accordance with applicable Government-wide NARA General Records Schedules. These schedules have varying retention requirements depending on the category of records maintained. The specific records retention periods for the items in Section 1.4 above can be obtained by reviewing NARA's listing of General Records Schedules.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk of unauthorized or inadvertent release of PII collected over the normal workflow process of managing personnel and their case files.

**Mitigation:** To mitigate these risks, TSA has implemented mandatory personnel security policies and procedures that require all personnel to be the subject of a favorable background investigation prior to being granted access to sensitive information systems. TSA also requires completion of appropriate access agreements (e.g., nondisclosure, acceptable use, rules of behavior, conflict-of-interest agreements) for individuals requiring access to organizational



information and information systems before authorizing access. Additionally, TSA requires all personnel to complete required IT security and privacy awareness training on an annual basis. Auditing functions are also in place to permit the reconstruction of security relevant events.

**Privacy Risk:** There is a risk that records will be retained longer than required under applicable records disposition schedules.

**Mitigation:** To mitigate these risks, TSA has implemented automated records disposition to implement the applicable NARA schedule when it can automate this process, and performs manual deletion for other records.

## **Section 6.0 Information Sharing**

### **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.**

TSA will share human capital information with the NFC, OPM, Social Security Administration, and other federal, state, local agencies to perform recruitment and hiring services, personnel actions, payroll and benefits services, assessments, customer service, and other workforce-related transactions or services in accordance with the Privacy Act and applicable SORNs.

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

The sharing described above is compatible with the original purpose for which the information was collected, namely to perform human capital functions. All external sharing falls within the scope of published routine uses defined in the SORNs identified in Section 1.2.

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

No, unless the information is also Sensitive Security Information (SSI) with dissemination limited by 49 U.S.C. 114(r).

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

Disclosures outside the Department are logged within the service request system that makes the disclosure, or within the record of the individual.



## 6.5 Privacy Impact Analysis: Related to Information Sharing

**Privacy Risk:** There is a privacy risk that information from PFP may be improperly disclosed outside of DHS.

**Mitigation:** This risk is partially mitigated by requiring all PFP personnel to sign a DHS non-disclosure agreement, and to take annual privacy and IT security training.

**Privacy Risk:** There is a risk that information shared with outside agencies may be re-disseminated improperly.

**Mitigation:** The risk is partially mitigated. When the recipient agency is a federal agency, it is under the same Privacy Act constraints in making disclosures that TSA is. Certain human resource information particularly wage and earnings data, is highly restricted.<sup>21</sup> TSA relies on other recipients to follow their own protocols for proper handling of PII.

## Section 7.0 Redress

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

Once hired, current employees are granted access to appropriate HR-related systems, which contain their PII. Authorized access is provided at or soon after onboarding using either the individual's PIV credential (Agency ID card), or traditional user id and password.

Individuals may also submit a Freedom of Information Act/Privacy Act (FOIA/PA) request to TSA in writing by mail to the following address:

Transportation Security Administration  
TSA-20, East Tower  
FOIA Branch  
601 South 12th Street  
Arlington, VA 20598-6020

FOIA/PA requests may also be submitted by fax at 571-227-1406 or by filling out the online Customer Service Form.

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<sup>21</sup> See 26 U.S.C. § 6103; 42 U.S.C. § 1306



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

Individuals may correct inaccurate or erroneous information in PFP systems that pertain to them by writing to the TSA Office of Human Capital at the following address:

Transportation Security Administration, TSA-21  
Director, Human Resources Contractor Support Management  
701 South 12th Street  
Arlington, VA 20598-6021

Individuals seeking to correct information in their records should provide their full name and a description of information that they seek to correct and the reason why the information is incorrect.

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

The publication of this PIA serves to provide public notice to individuals on procedures for correcting their information.

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

**Privacy Risk:** There is a risk that individuals may not have access to information maintained about them in PFP systems or be able to correct their information because they do not know which system maintains information about them.

**Mitigation:** Individuals may correct their information at any time during the period which TSA possesses and uses their information. Individuals are able to self-correct a number of records, or may request access to or correction of their personal information pursuant to the procedures outlined in this PIA, and in accordance with DHS procedures for requesting amendment of records at 6 C.F.R. § 5.26. Requesting correction of a record does not require knowledge of the specific system in which the record is stored but does require a reasonable description of the information that will assist TSA to identify the system holding the information.

## **Section 8.0 Auditing and Accountability**

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

Security, privacy, and accessibility risks will be mitigated through the use of technical, management, and operational security controls including:

- Using role-based user accounts and access controls to control access to PFP facilities, systems, and information that enforce a strict need to know policy.



- Securing the transmission and storage of data (e.g., encryption and/or two-factor authentication).
- Providing all government and contract personnel required privacy and IT security training on an annual basis.
- Performing monthly scans on servers that contain PFP data, and sending monthly scan results to the TSA Office of Information Technology/information Assurance Division for review.
- Performing periodic penetration testing, vulnerability scanning, incident response and forensic reviews on PFP systems.
- Establishing interconnections between TSA and non-TSA IT systems only through controlled interfaces and via approved service providers. Controlled interfaces will be accredited at the highest security level of information on the network.

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

All TSA and assigned service provider staff are required to complete DHS Privacy training. Compliance with this training requirement is audited periodically by the Contracting Officer Representative (COR) and TSA Privacy Officer, and failure to complete the training will be reported to the Contracting Officer (CO) or appropriate supervisor for remedial action.

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

Role-based access controls will be used to limit user and administrator access to PFP systems and information based on a need to know to perform official duties. TSA will also implement processes to enforce separation of duties to prevent unauthorized disclosure or modification of information. Adherence to access control policies will be enforced by TSA Information System Security Officers. System auditing and logging will be used to ensure users' compliance with role-based access controls and authorizations.



## **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?**

All memoranda of understanding (MOU) will be reviewed by the TSA PFP Program Manager, TSA Privacy Officer, and TSA Office of Chief Counsel.

### **Responsible Officials**

Steve Parsons  
Program Manager  
PFP/Office of Human Capital (OHC)  
Transportation Security Administration (TSA)

### **Approval Signature**

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

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Philip S. Kaplan  
Chief Privacy Officer  
Department of Homeland Security