



## **Privacy Impact Assessment**

For

**Office of Management Employee Services Portal (OMESP)**

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## 1. System Information.

*Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.*

The mission of the Office of Management (OM) is to transform the U.S. Department of Education (Department) into a high-performance, customer-focused organization by providing services to our customers that help them do a better job of managing their people, processes, and overall strategy.

The Assistant Secretary for OM serves as the principal adviser to the Secretary of Education on Departmental administrative matters. OM directs, coordinates, and recommends policy for activities that include, among numerous other objectives, the following:

- Administration of personnel security, suitability, and information security - as it relates to classified national security information on a Department-wide basis; and
- Working with the Office of the Chief Information Officer (OCIO) to ensure that appropriate and timely action is taken with respect to systems, processes and reviews pertaining to the information clearance process, including clearance packages, Statements of Work, Form 3000, Privacy Impact Assessments, and Privacy Act Systems of Records Notices, etc.

In support of these two specific objectives, OM is seeking to utilize the Department's Enterprise Business Collaboration (EBC) toolset, including SharePoint Enterprise 2010 to design and enable the Office of Management Employee Services Portal (OMESP). OMESSP is for use by staff and customers to efficiently provide and initiate recurring OM business processes and to access status of work requests, documents, and information.

OM Senior Leadership envisions this portal to serve as a way for the Departments' users, supervisors and leadership to gain access via one central location to obtain information on Human Capital Services, request actions for service, upload documents and review status of open requests. This portal would initially include one workflow, the Tuition Reimbursement Process. The OMESSP, in the future, shall evolve to become a portal for other OM services. The initial portal includes a full lifecycle human capital portal to provide the following human capital services in a tiered approach:

### **Tier 0: Employee & Manager Self Service**

- Online web access for employees to view their own information, basic processes, and find additional information as needed on various human resources (HR) related areas.
- A one stop portal for HR offering multiple areas for information, procedures, downloadable materials, forms, online requests, FAQ's, a search database of answers and solutions etc.
- Areas for peer to peer assistance such as message boards, communities of practice, chat areas, wikis etc.
- Any automated ability to process HR related updates or actions by the user.



### **Tier 1: HR Service Center & HR Helpdesk**

- Single point of contact for employees and managers to get questions answered (focusing on routine processes).
- Enable users to generate HR helpdesk tickets.

### **Tier 2: HR Service Providers**

- Subject Matter Experts (SME) focus on solving complex HR questions for employees and managers.
- User defined specifications, roles and information that is dynamic based on the profile. Users see what is relevant to their office, series and grade for HR related matters. For example, supervisors would have access to both employee and supervisory tools and guidance for performance measure.

### **Tier 3: Corporate HR**

- Develop policy, strategy and provide operational oversight
- An area to see policy, department wide programs and process
- Initiate escalations, appeals, policy interpretation guidance on the corporate level
- Strategic planning, workforce planning and other enterprise wide dashboards, analytics, compliance lists, HR program status etc.

*Note: The OMESP is currently under development and includes a single HR workflow. The portal will continue to be refined, developed, and additional HR and OM workflows or applications added. Therefore this Privacy Impact Assessment addresses the overall portal and the current HR workflow being developed and will be modified as additional workflows are added.*

## **2. Legal Authority.**

*Cite the legal authority to collect and use this data. What specific legal authorities, arrangements, and/or agreements regulate the collection of information?*

The portal itself does not collect any data. Each workflow within the portal may have different legal authorities, so they are being listed below by workflow.

### **Tuition Reimbursement**

5 U.S.C. sections 3301, 3302, 4103, 4109, and 4115, 5 C.F.R. sections 410.306, 410.308, 410.401, 410.601.



### 3. Characterization of the Information.

*What elements of personally identifiable information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)? What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

#### **Tuition Reimbursement**

Employee will complete a form on the SharePoint portal utilizing an Infopath form including all of the fields below, submit to supervisor and second level manager for approval and finally the form will be reviewed by the Department's Tuition Reimbursement selection panel.

- Employee name
- Principal Office
- HQ or Region
- Work mailing address
- Work phone
- Work fax number
- Position title
- Grade
- Length in current position
- Position level (non-supervisor, team leader, supervisor, manager, executive)
- Course title
- Course number
- Graduate/undergraduate
- Online/classroom
- Duty hours/non-duty hours
- Start date
- End date
- Start time
- End time
- College/university name
- College/university address



- College/university phone number
- Tuition
- Books cost
- Total cost
- Supervisor
- Second level manager
- Describe the duties and/or responsibilities in your current position that you intend to perform better by taking this course. Please be specific. Limit your response to half (½) page.
- Describe how the course content will improve the knowledge, skills, and abilities necessary to perform the job duties listed above. Please be specific. Limit your response to half (½) page.
- Describe the anticipated impact to the performance of your organization by taking this course. Please be specific. Limit your response to half (½) page.
- Course description from the college/university catalog or website.

#### 4. Why is the information collected?

*How is this information necessary to the mission of the program, or contributes to a necessary agency activity? Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

##### **Tuition Reimbursement**

The information collected on the application is used to determine the likelihood of increased employee and organizational performance that may result from the employee taking the requested course(s) and then all applications are ranked and approved according to the allotted budget for the program. The data that is collected on the application is not highly sensitive in nature and therefore the privacy risk is minimal.

#### 5. Social Security Number (SSN).

*If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures. Also specify any alternatives that you considered, and why the alternative was not selected. If system collects SSN, the PIA will require a signature by the Assistant Secretary or designee. If no SSN is collected, no signature is required.*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

##### **Tuition Reimbursement**

SSNs are not collected or used for Tuition Reimbursement.



## 6. Uses of the Information.

*What is the intended use of the information? How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

### **Tuition Reimbursement**

The information collected for this workflow will be used as follows:

- All information except employee name will be used by a selection panel to review, score, and rank applications for purpose of approving/disapproving the tuition reimbursement request
- Aggregate data will be shared on connectED
- Program administrator will review all information for purposes of quality and process control
- Emails will be sent to employees and their supervisors advising them of their approval or disapproval for tuition reimbursement

## 7. Internal Sharing and Disclosure.

*With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared?*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

### **Tuition Reimbursement**

Specific information from an individual employee application will only be shared with supervisor, second level manager, executive officer and the review panel. Aggregate information will be shared with all ED employees.

## 8. External Sharing and Disclosure.

*With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)? What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?*

Generally, this information will not be disclosed to any other entity. However, the Department of Education may disclose information contained in a record in this system under the applicable routine uses without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Possible disclosures include:



- Disclosure to Congress, Other Agencies, or the Public
- Disclosure for Use by Other Law Enforcement Agencies
- Enforcement Disclosure
- Litigation and Alternative Dispute Resolution (ADR) Disclosures
- Freedom of Information Act Disclosure

These disclosures may be made on a case-by-case basis or, if the Department has complied with the computer matching requirements of the Privacy Act, under a computer matching agreement.

## 9. Notice.

*Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)? What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?*

The portal itself does not collect any data. Each workflow within the portal may have different data requirements, so they are being listed below by workflow.

### **Tuition Reimbursement**

The Privacy Act Notice is on the application form itself. Employees voluntarily provide the information on the application; if the employee does not want to provide the information, then they will not be considered for tuition reimbursement.

## 10. Web Addresses.

*List the web addresses (known or planned) that have a Privacy Notice.*

[Sharepoint.ed.gov/teams/EmployeeServices](https://sharepoint.ed.gov/teams/EmployeeServices)

## 11. Security.

*What administrative, technical, and physical security safeguards are in place to protect the PII? Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?*

The OMESP and Tuition Reimbursement process is built as a SharePoint workflow within FSA's SharePoint infrastructure. All the required System Security requirements will be fulfilled through standard SharePoint Security functionality (which is dependent on Windows Active Directory).

The workflow is implemented as a site within the ESP Portal site collection, which is owned by the Office of Management team. The site will have Administrators, Contributors and normal users.

The "Tuition Reimbursement Process" workflow site itself is available to all employees within ED. The authentication will be managed by Windows Active accomplished by using "All Employees in ED"



Active Directory group to map to SharePoint groups. All authorizations (functional permissions), beyond all employee access, are managed using SharePoint groups which will be implemented to match the business functional roles.

The functional Administrators of the system are also Site Owners and will have complete control over access to the system. Reports are generated using information stored inside of SharePoint lists. No Privacy data is being stored in the system – but, for assessment purposes we will be sharing all the stored data fields to be reviewed independently. All Tuition Reimbursement workflow data is stored in SharePoint where a SharePoint list stores key fields which are required for reporting purposes. All data is behind the SharePoint security firewall and is access controlled, defined and limited by Active Directory and SharePoint groups.

For business continuity and disaster recovery purposes, the site, the business process and the SharePoint workflow will be prioritized as part of the overall ED framework for all applications, data and security.

## **12. Privacy Act System of Records.**

*Is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a? Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?*

This system is covered by the Government-Wide System of Records Notice OPM/GOVT-1, General Personnel Records

## **13. Records Retention and Disposition.**

*Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes – provide records schedule number:*

### **Tuition Reimbursement**

GRS 1 - Civilian Personnel Records, Item 29b, Employee Training Records:

b. Employee training.

Correspondence, memoranda, reports, and other records relating to the availability of training and employee participation in training programs sponsored by other government agencies or non-Government institutions.

Destroy when 5 years old or when superseded or obsolete, whichever is sooner. (NC1-64-77-10 item 30c).