U.S. Department of Housing and Urban Development

Office of the Chief Human Capital Officer

WebTA at BFS

Privacy Impact Assessment

November 19, 2014

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

INITIAL PRIVACY ASSESSMENT (IPA)

New Core Project
Phase 1

WebTA Release 2

Office of the Chief Human Capital Officer

11-19-2014

INTRODUCTION

What is an Initial Privacy Assessment?
An Initial Privacy Assessment (IPA) is designed to assess whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other related privacy documents are required. The responses to the IPA will provide a foundation for determining if either a PIA or SORN or both will be required, and will also help to identify any policy concerns.

The IPA incorporates the matters previously addressed in the Department's Personally Identifiable Information (PII) Survey, and thus replaces the survey.

When should an IPA be completed?
An IPA should be completed for all information collection activities, whether the system is electronic or contains only records in paper form, and should be completed before commencement of any testing or pilot project of an information system or prior to implementing new information collections requests. Additionally, an IPA should be completed any time there is a change to the information system or collection to determine whether there are any privacy issues as a result of such a change.

Who should complete the IPA?
The IPA should be written and reviewed by a combination of the component's (e.g., Privacy Act Officer, System Owner, Project Leaders, Paperwork Reduction Act Compliance Officers), and the program-specific office responsible for the system, project or information collections.

How is the IPA related to the Capital Planning, Certification and Accreditation, and the Paperwork Reduction Act process?
Upon completion and approval of the IPA by the Privacy Officer the official document may be uploaded into the C&A tool, and provided as part of the IT Capital Planning, and Paperwork Reduction Act package as validation of the completed evaluation. The completed IPA demonstrates that the program components have consciously considered privacy and related requirements as part of the overall information activities. For an IT system that does not require a C&A, such as a minor application that runs on a system that does require a C&A, an IPA still should be completed to determine if other related privacy documentation are required for that system or project.

Where should the completed IPA be sent?
A copy of the completed IPA should be sent to the Office of Privacy Project Leads for review. The Privacy Officer will review the IPA and determine what additional privacy documentation is required, and then will advise the Program component accordingly.

Initial Privacy Assessment

INFORMATION ABOUT THE SYSTEM OR PROJECT

Date Submitted for Review: 11-19-2014

Project Name/Acronym: New Core Project Phase 1, WebTA Release 2

System Owner/Contact information: Felicia Purifoy, Director, Office of Human Capital Services, (202) 402-2356

Project Leader/Contact Information: Gaye Walker, Chief, Time and Leave Administration Branch, (202) 402-3153

Which of the following describes the type of records in the system:

- [ ] Paper-Only
- [ ] Combination of Paper and Electronic
- [x] System
- [x] **Other:** Please describe below the type of project or system, including paper based Privacy Act System of Records, Rules, or Technologies'. Also, indicate whether this is a revision/update for an existing system or project.

The New Core Project supports the integration activities associated with the migration of HUD's core accounting and administrative functions to the Treasury Bureau of Fiscal Service's Administrative Resource Center (ARC) shared service environment. The New Core Interface Solution (NCIS) supports the interface of HUD systems with ARC's systems by leveraging the ARC/Oracle standard pre-built interfaces, reducing the overall effort of interface development. Depending on the specific interfacing HUD system, additional functionality will be performed by the NCIS, such as reformatting to ARC/Oracle standards and providing defaults and translations between legacy data values and ARC/Oracle standard data values.

The New Core Interface Solution (NCIS) will support legacy systems interfacing to the new modernized New Core solution, which will be maintained by Administrative Resource Center (ARC) at Department of Treasury. The NCIS will build the bridge from the legacy systems to the New Core Solution and thus reduce the impact to end users risk and cost of the initial implementation. The purpose of the NCIS is to leverage the ARC/Oracle standard pre-built interfaces and reduce the overall effort of interface development.

Note: For this form purpose, there is no distinction made between technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.

Section I: The Entire IPA (Sections I and II) Should be Completed for New Systems or Projects. If this is an Existing System or Project Skip to Section II. Unless requested by the Office of Privacy, this section should not be completed for an existing System or Project.

Question 1: Provide a general description of the system of Project. The following questions are intended to define the scope of the information in the system, information collection, or project, specifically the nature of the information and the sources from which it is obtained.

a. From whom is the information collected (i.e., government employees, contractors, or consultants, state, local government entities, or general public)?

HUD employees

b. What is the functionality of the system, information collection, or project and the purpose that the records and/or system serve?

The New Core Project supports the integration activities associated with the migration of HUD's core accounting and administrative functions to a shared service environment. The current plan assumes an implementation approach that includes multiple phases with multiple releases per phase. The scope for Phase 1 includes replacing the functionality of HUD's Central Accounting and Program System (HUDCAPS), Program Accounting System (PAS), HUD Consolidated Financial Statement System (HCFSS), the Financial Datamart (FDM), HUD's Integrated Acquisition Management System (HIAMS), Web Time and Attendance Management (WebTA) system, HUD's Relocation Travel System (mLINQS) and HUD's Travel System (FedTraveler), with multiple releases. Phase 2 of the program aims to implement a new fixed assets solution, managerial cost accounting, budget formulation, and a replacement for the Line of Credit Control System (LOCCS). Subsequent phases will evaluate migrating the Federal Housing Administration Subsidiary Ledger (FHASL) and Ginnie Mae Financial Accounting System (GFAS) to the shared services environment.

The Release 2 implementation of the HUD New Core Phase 1 system of WebTA, will help HUD optimize their most important resource – their own people. Using

WebTA, HUD can completely automate and simplify the time keeping, leave management and leave donor processes. BFS facilitates time management by providing a "single view" into all employee timesheets, leave requests and balances. WebTA enables timekeepers and employees to electronically enter and validate their own time, and submit it to their own supervisors for approval. Using webTA's advanced features, users can submit and approve leave requests and leave online, submit, manage and track all leave donor requests and manage projects and sub-projects at the agency, group and individual levels.

c. **How is information transmitted to and from the system, information collection, or project?**

The information is transmitted each pay period as an electronic file. Other reports may be transmitted by printout or in electronic format.

d. **What are the interconnections with other systems or projects?**

The Department of Agriculture's National Finance Center (NFC) Personnel and Payroll Center interfaces with webTA for such transactions as batch processes, file uploads, etc.

QUESTION 2: What is the Status of system, information collection, or project

a. If this is a new system, information collection, or project, specify the expected production date.

Release 2 – February, 2015

b. If an existing system, information collection, or project, specify the date of production.

NFC webTA was implemented at HUD in 2008.

QUESTION 3: Does this system, information collection, or project collect personal identifiers/sensitive information

YES	NO	
☑	☐	**Does the system, information collection, or project collect personal/sensitive information?** (e.g. name, address, personal email address, gender/sex, race/ethnicity, income/financial data, employment history, medical history, Social Security Number, Tax Identification Number, Employee Identification Number, FHA Case

Number). Includes PII that may be part of a registration process?

If yes, specific data sets collected or provided, and the legal authorities, arrangement, and/or agreement authorize the collection of information (i.e. must include authorities that cover all information collection activities, including Social Security Numbers)?

Name
SSN
Unique Identifier – H-ID which is a unique HUD identifier for every HUD employee.

External Laws and Regulations
PL 100-235, "Computer Security Act of 1987"
PL 93-579, Privacy Act of 1974"
PL 93-502, Freedom of Information Act"
PL 99-474, Computer Fraud and Abuse Act"
OMB Circular No. A-130, Appendix III, "Security of Federal Automated Systems"
OMB Circular No. A-123, "Mgt Accountability and Control," June 29, 1995
EO 9397

QUESTION 4: Does the information about individuals identify particular individuals (i.e., is the information linked or linkable to specific individuals, often referred to as personally identifiable information?)

Yes.

QUESTION 5: What type of Notice(s) are provided to the individual on the scope of information collected, the opportunity to consent to uses of said information, the opportunity to decline to provide information. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.)

a. Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.) If notice was not published, why not?

HUD SORN 34. February 10, 1998, Pay and Leave Records of Employees. This SORN can be seen at the following link:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/cio/privacy/sorns/hud_34

b. Do individuals have an opportunity and/or right to decline to provide information?

No. Because if the employee refuses to provide the information, the employee cannot be paid.

c. Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

No.

QUESTION 6: Is there a Certification & Accreditation record for your system? **(This question does not apply to Information Collection Requests)**

Yes

Specify below the systems categorization. If not available identify the FISMA-reported system whose Certification and Accreditation covers this system.

Confidentiality	☐	**Low**	☑	**Moderate**	☐	**High**	☐	**Undefined**
Integrity	☐	**Low**	☑	**Moderate**	☐	**High**	☐	**Undefined**
Availability	☐	**Low**	☑	**Moderate**	☐	**High**	☐	**Undefined**

Moderate.

SECTION II - The Entire IPA should be completed for New Systems or Projects. If this is an Existing System or Project Complete Only Complete This Section.

QUESTION 1: When was the system, information collection, or project developed?

The project was developed in 2013.

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QUESTION 2: If an existing system, information collection, or project, has the system or project undergone any changes since April 17, 2003?

HUD webTA system is being migrated in Feb. 2015 from the National Finance Center, Department of Agriculture Platform to the Bureau of Fiscal Services, Department of Treasury Platform.

QUESTION 3: If an existing system, information collection, or project, has the system or project, explain the changes the system or project will be undergoing as part of this renewal/update process.

The server upon which webTA resided under NFC vs BFS will change accordingly.

QUESTION 4: Do the changes to the system, information collection, or project involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?

No

QUESTION 5: Please indicate if any of the following changes to the system or project have occurred: (Mark all boxes that apply.)

☐ A conversion from paper-based records to an electronic system.

☐ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

☐ A new use of an IT system, including application of a new technology that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and /or avenue for exposure of data that previously did not exist.)

- [ ] A change that results in information in identifiable form being merged, centralized, or matched with other databases.

- [ ] A new method of authenticating the use of an access to information in the identifiable form by members of the public.

- [ ] A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

- [ ] A new interagency use of shared agency function that results in new uses or exchanges of information in identifiable form.

- [ ] A change that results in a new use of disclosure of information in identifiable form.

- [ ] A change that results in new items of information in identifiable form being added into the system.

QUESTION 6: Does a PIA for the system or project already exist? If yes, please provide a copy of the notice as an appendix.

Yes.

PRIVACY OFFICE DETERMINATION

(To be completed by the Privacy Office)

☐	**This is NOT a privacy sensitive system, information collection or project – the system, information collection, or project contains no personal identifiers/sensitive information**
☑	**This IS a Privacy Sensitive Project**
☑	**IPA sufficient at this time**
☑	**A PIA is required**
☐	**The existing PIA requires an update/deletion:**
☑	**A SORN is required for**
☐	**The existing SORN requires an update or should be deleted**
☐	**Other**

COMMENTS: The Privacy Office examined the New Core WebTA IPA responses and has determined that there are no privacy related risks at this time. If decisions change concerning the collection of PII the program sponsor will consult with Privacy Office to ensure that all privacy related requirement are addressed. A PIA is required for this system and the Program Office has submitted it along with the IPA the SORN has been completed and posted, in compliance with the FISMA requirements the IPA is scheduled for re-certification NLT November 30, 2016. Approval of this assessment is recommended.

DOCUMENT ENDORSMENT

DATE REVIEWED: November 25, 2014	
PRIVACY REVIEWING OFFICIALS NAME: Claretha P. Kashif, Senior Privacy Analyst	

The IPA is "not" an official document until all signatures are obtained for this page.

By signing below the Program Office or Support Office attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.

Felicia H. Purifoy

Felicia Purifoy
Director, Office of Human Capital Services
U.S. Department of Housing and Urban Development

12-5-14
Date

Donna Robinson-Staton

Donna Robinson-Staton
Chief Privacy Officer
Office of the Chief Information Officer
U. S. Department of Housing and Urban Development

12/9/14
Date

Appendix B

HUD-34: Pay and Leave Records of Employees

HUD/DEPT-34

System name: Pay and Leave Records of Employees.

System location: All Department offices and the Department of Agriculture's National Finance Center. For a complete listing of Department offices, with addresses, see appendix A. The address of the National Finance Center is PO Box 60000, New Orleans, LA 70160.

Categories of individuals covered by the system: Current and separated HUD employees.

Categories of records in the system: Name, Social Security Number and employee number, grade, step, and salary; organization, retirement or FICA data as applicable; Federal, state, and local tax deductions; regular and optional Government life insurance deduction(s), health insurance deduction and plan or code; Thrift Savings Plan participation and contribution; cash award data; jury duty data; military leave data; pay differentials; union dues deduction; allotments by type and amount; financial institution code and employee account number; leave status and data of all types (including annual, compensatory, jury duty, maternity, military, retirement disability, sick, transferred, and without pay); time and attendance records, including sign in/sign out sheets and related documentation; leave applications and reports; individual daily time reports; adjustments to time and attendance; overtime reports, supporting data, such as medical certificates; number of regular, overtime, holiday, Sunday, and other hours worked; pay period number and ending dates; cost of living allowances; mailing address; co-owner and/or beneficiary of bonds; marital status and number of dependents; ``Notification of Personnel Actions," Congressional requests or inquiries on the pay/leave problems of employees; court orders; personnel/payroll data requests; information about the problem received from the employee, an Administrative Office, or from a personnel employee, including supporting documentation; written correspondence pertaining to pay/leave problems; and related information or documentation.

Authority for maintenance of the system: Section 7(d), Department of Housing and Urban Development Act, 42 U.S.C. 3535(d).

Routine uses of records maintained in the system, including categories of users and the purposes of such uses: See Routine Uses paragraphs in prefatory statement.

Other Routine Uses: Transmittal of data to U.S. Treasury to effect issuance of paychecks to employees and distribution of pay according to employee directions for savings bonds, allotments, financial institutions, and other authorized purposes. Annual reporting of W-2 statements to Internal Revenue Service, Social Security Administration, the individual, and taxing authorities of the States, the District of Columbia, territories, possessions, and local governments, except Social Security Numbers shall be reported only to such authorities that have satisfied the requirements set forth in section 7(a)(2)(B) of the Privacy Act of 1974. To the Office of Personnel Management concerning pay, benefits, retirement deductions, and other information necessary for the office to carry on its Governmentwide personnel functions; to other Federal agencies to facilitate employee transfers; to the Department of Labor to process workers compensation injury claims; to other Federal agencies for the purpose of collecting debts owed to the Federal Government by administrative or salary offset; to the Federal Retirement Thrift Investment Board to administer the Thrift Savings Plan; to the Department of Agriculture's National Finance Center for payroll/personnel action, receipt account, time and attendance, and administrative overpayment processing; to the Department of Agriculture, Office of Inspector General, for audits of the payroll personnel system; to Federal, State, and local agencies to assist in the enforcement of child and spousal support obligations; to State governments, the District of Columbia, the Commonwealth of Puerto Rico, and the Virgin Islands to assist in processing unemployment claims under the Unemployment Compensation for Federal Employees Program. The names, social security numbers, home addresses, dates of birth, dates of hire, quarterly earnings, employer identifying information, and State of hire of employees may be disclosed to the Office of Child Support Enforcement, Administration for Children and Families, Department of Health and Human Services for the purpose of locating individuals to establish paternity, establishing and modifying orders of child support, identifying sources of income, and for other child support enforcement actions as required by the Personal Responsibility and Work Opportunity Reconciliation Act, Pub. L. 104-193).

Disclosure to consumer reporting agencies: Disclosures pursuant to 5 U.S.C. 552a(b)(12). Pursuant to 5 U.S.C. 552a(b)(12), disclosures may be made to a consumer reporting agency as defined in the Fair Credit Reporting Act (15. U.S.C. 1681a(f) or the Federal Claims Collection Act of 1966, 31 U.S.C. 3701(a)(3)).

Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:
Storage: Manual, machine-readable, and magnetic media.
Retrievability: Name of employee, Social Security Number.
Safeguards: Physical, technical, and administrative security is maintained with all storage equipment and/or rooms locked when not in use. Admittance, when open, is restricted to authorized personnel only. All payroll personnel, computer operators, programmers, and other staff are instructed and cautioned on the confidentiality of the records. Manual files are kept in lockable desks, file cabinets, and safes.
Retention and disposal: Retained on site until after GAO audit, then disposed of or transferred to Federal Records Storage Centers in accordance with fiscal records program approval by GAO, as appropriate, or General Record Schedules of the General Services Administration. Generally, records on employee pay/leave problems are retained in the operating office for three years after a decision has been made on the problem. For payroll related records, the retention schedule is the same as that for employee pay and leave records. In offices not actually processing the pay/leave problem resolution, problem pay/leave records are retained for six months after a decision has been made on the problem, and then may be disposed of.

System manager(s) and address: Director, Personnel Systems and Payroll Division, Office of Personnel and Training, Department of Housing and Urban Development, 451 Seventh Street, Southwest, Washington, DC 20410.

For information, assistance, or inquiry about the existence of records, contact the Privacy Act Officer at the appropriate location, in accordance with procedures in 24 CFR part 16. A list of all locations is given in appendix A. Record access procedures: The Department's rules for providing access to records to the individual concerned appear in 24 CFR part 16. If additional information or assistance is required, contact the Privacy Act Officer at the appropriate location. A list of all locations is given in appendix A.

Contesting record procedures: The Department's rules for contesting the contents of records and appealing initial denials, by the individual concerned, appear in 24 CFR part 16.

If additional information or assistance is needed, it may be obtained by contracting: (i) In relation to contesting contents of records, the Privacy Act Officer at the appropriate location (a list of all locations is given in appendix A) and (ii) in relation to appeals of initial denials, the Department of Housing and Urban Development Departmental Privacy Appeals Officer, Office of General Counsel, Department of Housing and Urban Development, 451 Seventh Street, Southwest, Washington, DC 20410.

Record source categories: Subject individuals; supervisors; timekeepers; official personnel records; previous employers; or other Federal Government agencies; Headquarters or Regional Office personnel responsible for solving pay/leave/time problems; National Finance Center personnel responsible for solving pay/leave/time problems; Field Office personnel who have information about pay/leave problems, banks, other financial institutions, and courts.