




Instructions

Privacy Impact Assessment (PIA)

The Privacy Impact Analysis (PIA) questionnaire is applicable to information systems which store or process privacy data. The questionnaire collects information about the types of privacy data which are stored and processed, why it is collected, and how it is handled. A PIA is required based on the results of a Privacy Threshold Analysis (PTA) questionnaire that has been completed for the information system.

Review the following steps to complete this questionnaire:

1) Answer questions. Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.

2) Add Comments. You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.

3) Change the Status. You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.

4) Save/Exit the Questionnaire. You may use any of the buttons at the bottom of the screen to save or exit the questionnaire. The 'Save and Close' button allows you to save your work and close the questionnaire. The 'Save and Continue' button allows you to save your work and remain in the questionnaire. The 'Cancel' button closes the questionnaire without saving your work.

00 Default Layout

Workflow Status:

99 Workflow Complete

PIA

General Information

PIA ID:	PIA-366	PIA Status:	Completed
Authorization Package (System Name):	HR Quality Management System (HR QMS)	This is a RPA:	No
Assessment Date:	6/22/2022	Is Latest:	Yes
FISCAL Year:	2022	PIA Required (From Authorization Package):	Yes
Final FISCAL Year:		PIA Expiration Date:	6/22/2023
		Final PIA Expiration Date:	6/22/2023

Override / Reopen Explanation

Override FISCAL Year:		Override PIA Expiration Date:	
Reopened Explanation:			

Other Stakeholders

Stakeholders (not in Approval Process)

System Owner (SO): Hanna, Jennifer L

Authorization Official: DelNegro, Elizabeth F

System Owner (eMail)

Name (Full)

Jennifer Hanna

Authorization Official (eMail)

Name (Full)

Elizabeth Delnegro

PIA Overview

A.System Name:	A. System, Application, or Project Name:	HR Quality Management System (HR QMS)
B.Includes:	B. System, application, or project includes information about:	Federal Employees
C.Categories:	C. For the categories listed above, how many records are there for each?	12,000 Federal Employee records
D.Data Elements:	D. System, application, or project includes these data elements:	HRQMS reviews and tracks maintenance to Federal employee data such as: Name: Used to identify the employee and retained for employee HR record GSA Employee ID: This is the primary unique identifier which allows HR professionals to search for information about GSA employees Social Security Number (SSN): Used and retained for employee HR record and tax reporting purposes Date of Birth (DOB): Used to identify employee age and retained for employee HR record Home Mailing Address: Used for communication and retained for employee HR record Phone Number(s): Used for communication and retained for employee HR record Email Address: Used for communication and retained for employee HR record Financial Account Information: Used to support payroll direct deposit Beneficiary Information: Includes contact information, SSN, DOB of beneficiaries. Retained for employee HR record Race/Ethnicity: Voluntarily self-reported for employee HR record
Overview:		
PIA-0.1:	Is this a new PIA or Recertification request?	Annual Recertification
PIA-0.1Changes:	If you are reviewing this for annual recertification, please confirm if there are any changes in the system since last signed PIA?	Yes, there are changes

Comments

Question Name	Submitter	Date	Comment	Attachment
No Records Found				

1.0 Purpose of Collection

PIA-1.1:	What legal authority and/or agreements allow GSA to collect, maintain, use, or disseminate the information?	The legal authorities permitting the tracking of maintenance of PII through HRQMS are: 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107 are the authorities for maintaining personnel information. Authorities for recording Social Security Numbers are E.O. 9397, 26 CFR 31.6011(b)â€², and 26 CFR 31.6109â€²1.
PIA-1.2:	Is the information searchable by a personal identifier, for example a name or Social Security number?	Yes
PIA-1.2a:	If so, what Privacy Act System of Records Notice(s) (SORN(s)) applies to the information being collected?	Existing SORN applicable
	PIA-1.2 System Of Record Notice (SORN) CR:	
PIA-1.2 System of Records Notice(s) (Legacy Text):	What System of Records Notice(s) apply/applies to the information?	OPM-GOVT 1 covers the GSAâ€™s personnel and training records.
PIA-1.2b:	Explain why a SORN is not required.	
PIA-1.3:	Has an information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)?	No
PIA-1.3 Information Collection Request:	Provide the relevant names, OMB control numbers, and expiration dates.	
PIA-1.4:	What is the records retention schedule for the information system(s)? Explain how long and for what reason the information is kept.	HRQMS tracks the maintenance of Federal employee information in HR Links. The record retention schedule is covered in the HR Links PIA (see link below). https://www.gsa.gov/cdnstatic/Human%20Resource%20Links%20(HRLinks)%20-%20PIA%20-%205-26-2021.pdf


2.0 Openness and Transparency

PIA-2.1:	Will individuals be given notice before the collection, maintenance, use or dissemination and/or sharing of personal information about them?	Yes
PIA-2.1 Explain:	If not, please explain.	HRQMS tracks the maintenance of Federal employee information in HR Links. Fillable forms available to GSA employees within HRLinks (e.g., SF2809, SF2810, SF2817; TSP1 and TSP1c) include a Privacy Act Notice that describes the legal authority for collecting the information; the primary and permissive routine uses of the information; and the potential consequences of not providing the requested information.

3.0 Data Minimization

PIA-3.1:	Why is the collection and use of the PII necessary to the project or system?	HRQMS tracks the maintenance of Federal employee information in HR Links. HR Links is the official repository of the personnel information, reports of personnel actions and the documents associated with these actions. The personnel action reports and other documents give legal force and effect to personnel transactions and establish employee rights and benefits under pertinent laws and regulations governing Federal employment. They provide the basic source of factual data about a person's Federal employment while in the service and after his or her separation. Records in this system have various uses, including screening qualifications of employees; determining status eligibility, and rights and benefits under pertinent laws and regulations governing Federal employment; computing length of service; and other information needed to provide personnel services.
PIA-3.2:	Will the system, application, or project create or aggregate new data about the individual?	No
PIA-3.2 Explained:	If so, how will this data be maintained and used?	
PIA-3.3:	What protections exist to protect the consolidated data and prevent unauthorized access?	HRQMS has implemented the required security and privacy controls according to NIST SP 800-53. HRQMS employs a variety of security measures designed to ensure that information is not inappropriately disclosed or released. These measures include security and privacy controls for access control, awareness and training, audit and accountability, security assessment and authorization, configuration management, contingency planning, identification and authentication, incident response, maintenance, planning, personnel security, risk assessment, system and services acquisition, system and communications protection, system and information integrity, and program management.
PIA-3.4:	Will the system monitor the public, GSA employees, or contractors?	GSA Employees
PIA-3.4 Explain:	Please elaborate as needed.	HRQMS does not monitor the GSA employees.
PIA-3.5:	What kinds of report(s) can be produced on individuals?	HRQMS may create human resource reports related to GSA employees.
PIA-3.6:	Will the data included in any report(s) be de-identified?	No
PIA-3.6 Explain:	If so, what process(es) will be used to aggregate or de-identify the data?	
PIA-3.6 Why Not:	Why will the data not be de-identified?	ISSO is to fill

4.0 Limits on Using and Sharing Information

PIA-4.1:	Is the information in the system, application, or project limited to only the information that is needed to carry out the purpose of the collection?	Yes
PIA-4.2:	Will GSA share any of the information with other individuals, federal and/or state agencies, or private-sector organizations?	None
PIA-4.2How:	If so, how will GSA share the information?	HRQMS does not share information.
PIA-4.3:	Is the information collected:	Directly from the Individual
PIA-4.3Other Source:	What is the other source(s)?	HRQMS tracks maintenance activities on Federal employee information contained in HR Links. HR Links is the only source of information.
PIA-4.4:	Will the system, application, or project interact with other systems, applications, or projects, either within or outside of GSA?	No
PIA-4.4Who How:	If so, who and how?	
PIA-4.4Formal Agreement:	Is a formal agreement(s) in place?	
PIA-4.4No Agreement:	Why is there not a formal agreement in place?	N/A

5.0 Data Quality and Integrity

PIA-5.1:	How will the information collected, maintained, used, or disseminated be verified for accuracy and completeness?	HR Links tracks maintenance updates to information contained in HR Links. On an ongoing basis, GSA employees review, update and enter data directly into HR Links as needed. Each GSA employee is responsible for checking the accuracy of their data and should contact OHRM with any questions.
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6.0 Security

PIA-6.1a:	Who or what will have access to the data in the system, application, or project?	GSA OHRM staff users who may have a need to access employees' SSNs or DOBs, as well as other information contained in HR Links.
PIA-6.1b:	What is the authorization process to gain access?	GSA OHRM staff users who may have a need to access employees' SSNs or DOBs, as well as other information contained in HR Links.
PIA-6.2:	Has a System Security Plan (SSP) been completed for the Information System(s) supporting the project?	Yes
PIA-6.2a:	Enter the actual or expected ATO date from the associated authorization package.	7/8/2020
PIA-6.3:	How will the system or application be secured from a physical, technical, and managerial perspective?	GSA has implemented the required security and privacy controls according to NIST SP800-53. GSA employs a variety of security measures designed to ensure that information is not inappropriately disclosed or released. These measures include security and privacy controls for access control, awareness and training, audit and accountability, security assessment and authorization, configuration management, contingency planning, identification and authentication, incident response, maintenance, planning, personnel security, risk assessment, system and services acquisition, system and communications protection, system and information integrity, and program management.
PIA-6.4:	Are there mechanisms in place to identify and respond to suspected or confirmed security incidents and breaches of PII?	Yes
PIA-6.4What:	What are they?	GSA has implemented an Incident Response process that identifies breaches to PII through the implementation of the GSA Incident Response policy and procedure.

7.0 Individual Participation

PIA-7.1:	What opportunities do individuals have to consent or decline to provide information?	HRQMS tracks maintenance updates to information in HR Links. GSA employees consent to use of information upon employment with the Federal government. Individuals can decline to provide information, and if so, may not be able to complete human resources and payroll activities necessary for employment. Certain HR Links data fields are mandatory for human resources and payroll processing; however, individuals have the ability to voluntarily self-report personnel information including race, national origin, and ethnicity data.
PIA-7.1Opt:	Can they opt-in or opt-out?	Yes
PIA-7.1Explain:	If there are no opportunities to consent, decline, opt in, or opt out, please explain.	
PIA-7.2:	What are the procedures that allow individuals to access their information?	HRQMS tracks maintenance updates to information in HR Links. The HR Links interface provides users with guided options to edit data. GSA is responsible for training employees on how to use the HR Links system. Some information updates may require additional approval, for example promotions.
PIA-7.3:	Can individuals amend information about themselves?	Yes
PIA-7.3How:	How do individuals amend information about themselves?	HRQMS tracks maintenance updates to information in HR Links. HR Links is a self-service system and employees have access to their respective data. Employees can access, redress and correct their own personnel information, and can review and update their respective HR information as necessary. Additionally, assigned managers and HR administrators will be able to update their employees' data such as reprimands, education and benefits. GSA employees should contact OHRM if they ever have any questions or concerns

8.0 Awareness and Training

PIA-8.1:	Describe what privacy training is provided to users, either generally or specifically relevant to the system, application, or project.	GSA has developed, implemented, and regularly updates annual training modules on IT Security and Privacy Awareness and Sharing Securely in a Collaborative Environment. All GSA account holders also electronically sign the GSA Rules of Behavior.
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9.0 Accountability and Auditing

PIA-9.1:	How does the system owner ensure that the information is used only according to the stated practices in this PIA?	GSA personnel accessing the HRQMS system are required to adhere to the GSA Rules of Behavior along with the security and privacy training the employees receive annually.
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