



# Human Resources Quality Management System (HRQMS)

## *Privacy Impact Assessment (PIA)*

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Chief Privacy Officer (CPO) - Under the direction of the Senior Agency Official for Privacy (SAOP), the CPO is responsible for evaluating the PIA and ensuring the program manager/system owner has provided complete privacy-related information.

## Document Revision History

Date	Description	Version #
01/01/2018	Initial Draft of PIA Update	1.0
04/23/2018	Added questions about third-party services and robotics process automation (RPA)	2.0
6/26/2018	New question added to Section 1 regarding Information Collection Requests	2.1
8/29/2018	Updated prompts for questions 1.3, 2.1 and 3.4.	2.2
11/5/2018	Removed Richard's email address	2.3
11/28/2018	Added stakeholders to streamline signature process and specified that completed PIAs should be sent to <a href="mailto:gsa.privacyact@gsa.gov">gsa.privacyact@gsa.gov</a>	2.4
4/15/2019	Updated text to include collection, maintenance or dissemination of PII in accordance with e-Gov Act (44 U.S.C. § 208)	2.5
9/18/2019	Streamlined question set	3.0
03/31/2021	Initial Human Resources Quality Management System (HRQMS) - PIA	3.1
5/11/2021	Approved	3.2

# Table of contents

## SECTION 1.0 PURPOSE OF COLLECTION

- 1.1 What legal authority and/or agreements allow GSA to collect, maintain, use, or disseminate the information?
- 1.2 Is the information searchable by a personal identifier, for example a name or Social Security number? If so, what Privacy Act System of Records Notice(s) applies to the information being collected?
- 1.3 Has an information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)? If yes, provide the relevant names, OMB control numbers and expiration dates.
- 1.4 What is the records retention schedule for the information system(s)? Explain how long and for what reason the information is kept.

## SECTION 2.0 OPENNESS AND TRANSPARENCY

- 2.1 Will individuals be given notice before the collection, maintenance, use or dissemination and/or sharing of personal information about them? If not, please explain.

## SECTION 3.0 DATA MINIMIZATION

- 3.1 Why is the collection and use of the PII necessary to the project or system?
- 3.2 Will the system create or aggregate new data about the individual? If so, how will this data be maintained and used?
- 3.3 What controls exist to protect the consolidated data and prevent unauthorized access?
- 3.4 Will the system monitor members of the public, GSA employees, or contractors?
- 3.5 What kinds of report(s) can be produced on individuals?
- 3.6 Will the data included in any report(s) be de-identified? If so, how will GSA aggregate or de-identify the data?

## SECTION 4.0 LIMITS ON USES AND SHARING OF INFORMATION

- 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, maintenance, use, or dissemination?
- 4.2 Will GSA share any of the information with other individuals, Federal and/or state agencies, or private sector organizations? If so, how will GSA share the information?
- 4.3 Is the information collected directly from the individual or is it taken from another source? If so, what is the other source(s)?
- 4.4 Will the system, application, or project interact with other systems, either within GSA or outside of GSA? If so, what other system(s), application(s) or project(s)? If so, how? If so, is a formal agreement(s) in place?

## **SECTION 5.0 DATA QUALITY AND INTEGRITY**

5.1 How will GSA verify the information collection, maintenance, use, or dissemination for accuracy and completeness?

## **SECTION 6.0 SECURITY**

6.1 Who or what will have access to the data in the project? What is the authorization process for access to the project?

6.2 Has GSA completed a system security plan (SSP) for the information system(s) supporting the project?

6.3 How will the system be secured from a physical, technical, and managerial perspective?

6.4 Are there mechanisms in place to identify and respond to suspected or confirmed security incidents and breaches of PII? If so, what are they?

## **SECTION 7.0 INDIVIDUAL PARTICIPATION**

7.1 What opportunities do individuals have to consent or decline to provide information? Can they opt-in or opt-out? If there are no opportunities to consent, decline, opt in, or opt out, please explain.

7.2 What procedures allow individuals to access their information?

7.3 Can individuals amend information about themselves in the system? If so, how?

## **SECTION 8.0 AWARENESS AND TRAINING**

8.1 Describe what privacy training is provided to users, either generally or specifically relevant to the project.

## **SECTION 9.0 ACCOUNTABILITY AND AUDITING**

9.1 How does the system owner ensure that the information is being used only according to the stated practices in this PIA?

## **Document purpose**

This document contains important details about HR QMS. To accomplish its mission, the Office of Human Resources Management (OHRM) must, in the course of HRQMS, collect personally identifiable information (PII) about the people who use such products and services. PII is any information<sup>[1]</sup> that can be used to distinguish or trace an individual's identity like a name, address, or place and date of birth.

GSA uses Privacy Impact Assessments (PIAs) to explain how it collects, maintains, disseminates, uses, secures, and destroys information in ways that protect privacy. This PIA comprises sections that reflect GSA's [privacy policy](#) and [program goals](#). The sections also align to the Fair Information Practice Principles (FIPPs), a set of eight precepts codified in the Privacy Act of 1974.<sup>[2]</sup>

### **A. System, Application, or Project Name:**

HRQMS – Human Resources Quality Management System

### **B. System, application, or project includes information about:**

Federal Employees

### **C. For the categories listed above, how many records are there for each?**

12,000 Federal Employee records

### **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

HRQMS provides GSA HR specialists the tools to perform their day-to-day jobs. This includes the analysis for determining data errors, discrepancies and anomalies in the various HR systems and information for correcting the data issues. The system uses a workflow process to track data items flagged for review and also provides statistics on error trending and work item tracking.

### SECTION 1.0 PURPOSE OF COLLECTION

*GSA states its purpose and legal authority before collecting PII.*

#### **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)-2, and 26 CFR 31.6109-1.

#### **1.2 Is the information searchable by a personal identifier, for example a name or Social Security Number? If so, what System of Records Notice(s) apply/applies to the information?**

Yes, employees are uniquely identified by a randomly generated system identifier called EMPLID and/ employee name. OPM-GOVT 1 covers the GSA's personnel and training records.

#### **1.3 Has an Information Collection Request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)? If yes, provide the relevant names, OMB control numbers, and expiration dates.**

No ICR has been submitted to OMB for HRQMS.

**1.4 Has a records retention schedule been approved by the National Archives and Records Administration (NARA)? Explain how long and for what reason the information is retained.**

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/20200504%20-%20Human%20Resource%20Links%20\(HRLinks\)\\_PIA\\_signed.docx.pdf](https://www.gsa.gov/cdnstatic/20200504%20-%20Human%20Resource%20Links%20(HRLinks)_PIA_signed.docx.pdf)

**SECTION 2.0 OPENNESS AND TRANSPARENCY**

*GSA is open and transparent. It notifies individuals of the PII it collects, maintains, uses or disseminates as well as how it protects and shares it. It provides straightforward ways for individuals to learn how GSA handles PII.*

**2.1 Will individuals be given notice before the collection, maintenance, use or dissemination of personal information about themselves? 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.

**SECTION 3.0 DATA MINIMIZATION**

*GSA limits PII collection only to what is needed to accomplish the stated purpose for its collection. GSA keeps PII only as long as needed to fulfill that purpose.*

**3.1 Why is the collection and use of the PII necessary to the system, application, or project?**

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.

**3.2 Will the system, application, or project create or aggregate new data about the individual? If so, how will this data be maintained and used?**

HRQMS does not create or aggregate new data about individuals.

**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.

**3.4 Will the system monitor the public, GSA employees, or contractors?**

HRQMS does not monitor the GSA employees.

**3.5 What kinds of report(s) can be produced on individuals?**

HRQMS may create human resource reports related to GSA employees.

**3.6 Will the data included in any report(s) be de-identified? If so, what process(es) will be used to aggregate or de-identify the data?**

HRQMS does not de-identify data for reporting.

**SECTION 4.0 LIMITS ON USING AND SHARING INFORMATION**

*GSA publishes a notice about how it plans to use and share any PII it collects. GSA only shares PII in ways that are compatible with the notice or as stated in the Privacy Act.*

**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?**

HRQMS limits information to only what is required to carry out to track human resource maintenance activities.

**4.2 Will GSA share any of the information with other individuals, federal and/or state agencies, or private-sector organizations? If so, how will GSA share the information?**

HRQMS does not share information.

**4.3 Is the information collected directly from the individual or is it taken from another source? If so, 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.

**4.4 Will the system, application, or project interact with other systems, applications, or projects, either within or outside of GSA? If so, who and how? Is a formal agreement(s) in place?**

HRQMS does not interact with other systems.

**SECTION 5.0 DATA QUALITY AND INTEGRITY**

*GSA makes reasonable efforts to ensure that all PII it maintains is accurate, relevant, timely, and complete.*

**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.

**SECTION 6.0 SECURITY**

*GSA protects PII from loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.*

**6.1 Who or what will have access to the data in the system, application, or project? 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.

**6.2 Has GSA completed a System Security Plan (SSP) for the information system(s) or application?**

HRQMS is documented in the ACA SSP and Authority to Operate was granted on July 8, 2020.

**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.

**6.4 Are there mechanisms in place to identify and respond to suspected or confirmed security incidents and breaches of PII? If so, 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.

**SECTION 7.0 INDIVIDUAL PARTICIPATION**

*GSA provides individuals the ability to access their PII and to correct or amend it if it is inaccurate. If GSA exempts a system or program from access, amendment and other provisions of the Privacy Act, it notifies the public of that exemption.*

**7.1 What opportunities do individuals have to consent or decline to provide information? Can they opt-in or opt-out? If there are no opportunities to consent, decline, opt in, or opt out, please explain.**

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.

## **7.2 What procedures 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.

## **7.3 Can individuals amend information about themselves? If so, how?**

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.

## **SECTION 8.0 AWARENESS AND TRAINING**

*GSA trains its personnel to handle and protect PII properly.*

### **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.

## **SECTION 9.0 ACCOUNTABILITY AND AUDITING**

*GSA's Privacy Program is designed to make the agency accountable for complying with the Fair Information Practice Principles. GSA regularly checks that it is meeting the requirements and takes appropriate action if it is not.*

### **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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<sup>[1]</sup>OMB Memorandum [Preparing for and Responding to the Breach of Personally Identifiable Information](#) (OMB M-17-12) defines PII as: "information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual." The memorandum notes that "because there are many different types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad."

<sup>[2]</sup> Privacy Act of 1974, 5 U.S.C. § 552a, as amended.