

Privacy Impact Assessment

FAR Data Collection Pilot

February 21, 2017

SYSTEM ASSESSMENT

A. Data in the System

Question	Explanation/Instructions
1. What is the specific purpose of the agency's use of the information and how does that use fit with the agency's broader mission?	<p><i>The system will allow Contractors to report certified payroll for the Davis Bacon Act. The contractors should be able to:</i></p> <ul style="list-style-type: none"> • <i>Create and review payroll reports;</i> • <i>Certify the reports;</i> • <i>Send the reports to appropriate recipients (e.g. Prime Contractors and Contracting Officers);</i> • <i>Import weekly payroll data by specifying a comma-separated values (CSV) file</i>
2. Describe all information to be included in the system, including personal data.	<p><i>a. The system will capture weekly certified payroll data for contractors that are required to submit their payroll's under the Davis Bacon Act.</i></p> <p><i>b. The system will maintain the names of the contractors, their company information, email and their wages. The system will also store the name and email address of contracting officers.</i></p>
2.a. What stage of the life cycle is the system currently in?	<i>Development/Implementation.</i>
2.b. What are the sources of the information in the system?	<i>The wage data originates from the contractors and is entered manually by them.</i>
2.c. What GSA files and databases are used?	<p><i>A PostgreSQL database is used by the application to store data. An S3 bucket is used to store attachments. PostgreSQL and S3 bucket reside in an environment inherited from U.S. General Services Administration (GSA) Business Services Platform (BSP). BSP resides on the Amazon Web Services (AWS) East/West US Public Infrastructure as a Service (IaaS) Cloud for hosting and related infrastructure services.</i></p>
2.d. What Federal agencies are providing data for use in the system?	<i>Publicly available Wage Determinations data from WDOL (https://www.wdol.gov) is used by the application.</i>
2.e. What State and local agencies are providing data for use in the system?	<i>Department of Labor</i>
2.f. From what other third party sources will the data be collected?	<i>Wage Determinations Online WDOL https://www.wdol.gov</i>

<p>2.g. What information will be collected from the individual whose record is in the system?</p>	<p>Contractor: Last Name, First Name, Position in Company, Phone, Email, Contractor Employee: Last Name, First Name, ID #, Work classification, Hours Worked by day/date, Total hours, Rate Fringes (cash), Fringes (employer-paid), Federal projects Gross earnings. Contracting Officer: Name, position, phone, email.</p>
<p>3. How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?</p>	<p><i>No data will be collected other than that from the individual. Each contractor must certify any payroll report(s) submitted under the Davis Bacon Act. This step serves as a verification of the information that is collected about contractor employees.</i></p>
<p>3.a. How will data be checked for completeness?</p>	<p><i>Information for the profile page is filled in by the contracting officer and the contractors. Payroll information filled in by the contractor has some fields that are mandatory and the system ensures that the user inputs these into the system before the payroll is submitted.</i></p>
<p>3.b. Is the data current? How do you know?</p>	<p><i>It will be the responsibility of the contractor to input current data on payrolls and present it to the contracting officer each week.</i></p>
<p>4. Are the data elements described in detail and documented? If yes, what is the name of the document?</p>	<p><i>Data elements are defined in the repository: https://github.helix.gsa.gov/CAP/payroll-backend/tree/master/src/db/migrations</i></p>

B. Access to the Data

Question	Explanation/Instructions
1. Who will have access to the data in the system?	<p><i>Application System Administrator (Contractor: NuAxis). Contractors and Contracting Officers. Development Team Members.</i></p>
1.a. Is any of the data subject to exclusion from disclosure under the Freedom of Information Act (FOIA)? If yes, explain the policy and rationale supporting this decision.	<p><i>If so, reference the specific exemption under the FOIA (5 U.S.C. Section (b)(1) through (9)), to support your rationale.</i></p> <p><i><u>Dept. of Justice guidance on exemptions:</u> http://www.usdoj.gov/oip/foi-act.htm</i></p> <p><i><u>FOIA text:</u> http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm</i></p> <p><i>Yes Exemption 4. Commercial or financial obtained from a "Person".</i></p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p><i>All users authenticate to the system and have assigned roles. Contractor creates the payroll and submits it. There are 3 roles for the contractor:</i></p> <p><i>Admin: Can create and submit payroll, add users to add/edit payroll. Submit: Can create and submit the payroll Create: Can create but not submit a payroll.</i></p> <p><i>Contracting Officer reviews the payroll and approves it.</i></p>
3. Will users have access to all data in the system or will the users' access be restricted? Explain.	<p><i>The contractor will have access to data pertaining to their own contracts. The contracting officer will have access to data submitted under his contracts.</i></p>
4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?	<p><i>The users of the system do not have access to the database. The system does not provide for browsing any data other than the data entered by them or submitted to them. Permissions are enforced internally in the application.</i></p> <p><i>1. Application System Administrator: The role is restricted to creating users and contracts. The role does not have access to any other features of the application.</i></p> <p><i>2. Contracting Officer: The role is restricted to view their own contracts and payrolls that were submitted against them.</i></p> <p><i>3. Contractors: The role is restricted to view their own contracts, create payrolls for their contracts, send/submit payrolls for their contracts, add subcontractors that already exist in the system to their contracts, and</i></p>

	<p>manage users within their organization.</p> <p>4. Application Developers: Development team members have access to the source code and the database. Access to the source code repository and database is controlled via multifactor authentication.</p>
5. Do other systems share data or have access to data in this system? If yes, explain.	<i>Other systems do not have access to the data in the application. Wage Determinations Online data is imported into the application in the form of an XML file and the system is not connected to WDOL directly.</i>
5.a. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?	<i>Program Office in conjunction with Privacy Office.</i>
6. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	<i>None</i>
6.a. How will the data be used by the agency?	<i>GSA will not utilize the data entered by the contractor for any purpose. The application will be used to judge if the contractor burden in submitting payrolls under the Davis Bacon act is reduced by using the Payroll Reporting Pilot.</i>
6.b. Who is responsible for assuring proper use of the data?	<i>Program Office</i>
6.c. How will the system ensure that agencies only get the information to which they are entitled?	<i>Contracting officers will login to the system using their credentials and will have access to data for their own contracts.</i>
7. What is the life expectancy of the data?	<i>Retention periods for data are currently indefinite.</i>
8. How will the data be disposed of when it is no longer needed?	<i>N/A</i>

C. Attributes of the Data

Question	Explanation/Instructions
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<p>1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?</p>	<p>Contractor: Name, Position in Company, Phone, Email – Identifies the Contractor to the contracting officer. Contractor Employee: Last Name, First Name, ID #, Work classification, Hours Worked by day/date, Total hours, Rate Fringes (cash), Fringes (employer-paid), Federal projects Gross earnings. –Required for the Davis Bacon Act Contracting Officer: Name, Position, Phone, Email. - Identifies the contracting officer to the contractors.</p>
<p>2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?</p>	<p><i>No</i></p>
<p>2.a. Will the new data be placed in the individual's record (client or employee)?</p>	<p><i>No</i></p>
<p>2.b. Can the system make determinations about individuals that would not be possible without the new data?</p>	<p><i>No. The system does not calculate or extrapolate from the data.</i></p>
<p>2.c. How will the new data be verified for relevance and accuracy?</p>	<p><i>There will be no determination on relevancy and accuracy of the individuals for which the data is provided. Accuracy of work classifications and their wage rate to which the individual belongs to will be determined.</i></p> <p><i>Each contractor must certify any payroll report(s) submitted under the Davis Bacon Act.</i></p>
<p>3. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.</p>	<p><i>N/A</i></p>
<p>3.a. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.</p>	<p><i>N/A</i></p>
<p>4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.</p>	<p><i>All users must logon to the application with a username and password to retrieve data.</i> <i>Contractors can view payroll reports submitted by their subcontractors on a contract.</i> <i>Contracting Officers can view payroll reports submitted by</i></p>

	<i>contractors on their contracts.</i>
<p>5. What are the potential effects on the privacy rights of individuals of:</p> <p>a. Consolidation and linkage of files and systems;</p> <p>b. Derivation of data;</p> <p>c. Accelerated information processing and decision making; and</p> <p>d. Use of new technologies. How are the effects to be mitigated?</p>	<p><i>The data will be stored in separate files and will not be consolidated or linked. Additionally, the same data types will be attributed e.g. wage rate or worker classification to an individual name over the payroll submission period.</i></p>

D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1. Explain how the system and its use will ensure equitable treatment of individuals.	<i>The system uses standard web forms to ensure the same data is stored. It is a server-based, centrally located system.</i>
1.a. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	<i>The system will not utilize more than one site.</i>
1.b. Explain any possibility of disparate treatment of individuals or groups.	<i>The system is fully compliant with the standards outlined in Section 508 of the Rehabilitation Act of 1973, thereby ensuring equal access to information for individuals with disabilities. The system is neutral to all individuals and groups.</i>
2. What are the retention periods of data in this system?	<i>System records will be retained and disposed of according to each respective agency's records maintenance and disposition schedules including, as applicable, the NARA General Records Schedule 1.1, Financial Management and Reporting Records.</i>
2.a. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	<i>N/A</i>
2.b. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	<i>Data is input by the users of the system. There are no requirements to revisit the data once it has been posted.</i>
3. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	<i>No</i>
3.a. How does the use of this technology affect individuals' privacy?	<i>The system uses standardized technologies for web-based applications. The system is only used by the contractors and contracting officers.</i>
4. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	<i>No</i>
4.a. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	<i>No</i>
4.b. What controls will be used to prevent unauthorized monitoring?	<i>No</i>

5. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	<i>[Notice-ID- 2016-02; Docket No: 2016-0002; Sequence No. 28]</i>
5.a. If the system is being modified, will the SOR require amendment or revision? Explain.	N/A