Privacy Impact Assessment
Template

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USDA

United States Department of Agriculture

Privacy Impact Assessment for the

HRworx Intelliworx Cloud

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Abstract

The Intelliworx system is a software application platform that allows customers agencies to streamline and automate workflows in any number of mission areas.

The tools that this platform uses to automate workflows include:

- Define the people who are part of a given business workflow: assigning them roles, permissions, tasks, and responsibilities.
- Gather information critical to the workflow in a streamlined and intuitive way.
- Map gathered data to official government forms in PDF format
- Define the task that need to be completed by users and provide mechanisms for approvals, notifications/reminders, and reporting.
- Integrate with existing government systems to accept, process and store data.

Overview

The Intelliworx (FDonline) application is hosted entirely on the AWS GovCloud Infrastructure-as-a-Service (IaaS) platform, and no hardware or software outside of the AWS GovCloud is used.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1   What information is collected, used, disseminated, or maintained in the system?

Full Name
Date of Birth
Social Security Number
Home Address
Telephone number
Email address
Demographics (race, nationality, ethnicity)
Employment: work address, grade, title, work phone
Types and amounts of salaries, investments, and assets
Creditor name, city, state, country

1.2   What are the sources of the information in the system?

The Intelliworx system collects PII within the following fields for the inherent purposes of onboarding new hires and filing financials disclosure forms. The PII is integral to the business processes of the Intelliworx system.

1.3 Why is the information being collected, used, disseminated, or maintained?

The Intelliworx system collects PII within the following fields for the inherent purposes of onboarding new hires and filing financials disclosure forms.

1.4 How is the information collected?

The PII is considered to be current as it is entered directly by the individual at the time of onboarding or filing. Individuals are responsible for entering accurate PII and maintaining currency of the data submitted.

1.5 How will the information be checked for accuracy?

In addition to automated formatting validation within the software, HRworx verifies bank routing numbers within the onboarding module against the Federal Reserve FedACH routing directory.

It is required of the agency to implement processes that verify accuracy of the PII collected.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

The PII accountability requirement dictated by agencies are included in contracts with the prime contractors, which then flow down to HRworx as the subcontractor.

1.7 <u>Privacy Impact Analysis</u>: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Risk: Ensuring the information the customer inputs into the system is accurate and up to date

Mitigation: In addition to automated formatting validation within the software, HRworx verifies bank routing numbers within the onboarding module against the Federal Reserve FedACH routing directory.

It is required of the agency to implement processes that verify accuracy of the PII collected.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1   Describe all the uses of information.

The Intelliworx system collects PII within the following fields for the inherent purposes of onboarding new hires and filing financials disclosure forms.

2.2   What types of tools are used to analyze data and what type of data may be produced?

2 Splunk log aggregations & SIEM server
Qualys Continual Monitoring + SaaS services
CrowdStrike Falcon Prevent, Insight, and Overwatch SaaS service

2.3   If the system uses commercial or publicly available data please explain why and how it is used.

Commercial data will be used in the application. The Intelliworx system collects PII within the following fields for the inherent purposes of onboarding new hires and filing financials disclosure forms. The PII is integral to the business processes of the Intelliworx system.

2.4   <u>Privacy Impact Analysis</u>: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

HRworx individuals are provided access to the Intelliworx system in accordance with established account provisioning and management processes that take into account personnel screening requirements from the agency. Additionally, HRworx provides security awareness training to all employees and displays a warning banner each time an individual logs onto the system, describing that unauthorized or improper use may result in disciplinary action and civil and criminal penalties.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1   How long is information retained?

Once data has reached the six (6) year maximum retention period within FDonline, records are moved to a queue where customers (e.g., data owners) must designate whether the record can be purged or if the record needs to be held.

Once data within the onboarding module has reached the end of the ninety (90) day retention period, it is automatically purged from the system, as long as certain conditions are met (e.g., the process cannot be ongoing).

The Intelliworx system does not maintain reports that contain PII as there is no need or business process that necessitates this.

3.2   Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

Yes

3.3   <u>Privacy Impact Analysis</u>: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Once data within the onboarding module has reached the end of the ninety (90) day retention period, it is automatically purged from the system, as long as certain conditions are met (e.g., the process cannot be ongoing).

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1   With which internal organization(s) is the information shared, what information is shared and for what purpose?

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

The FDonline module does not provide PII to any third-party organizations.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

4.2   How is the information transmitted or disclosed?

Federal agency customers populating the system with PII is integral to the business processes of the Intelliworx system. HRworx only populates the Intelliworx system with PII during the initial onboarding of customers, if the federal agency provides the data to be loaded into the system.

4.3   **Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

Access is controlled by authentication and is restricted to authorized individuals.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1   **With which external organization(s) is the information shared, what information is shared, and for what purpose?**

The PII is integral to the business processes of the Intelliworx system.

The FDonline module does not provide PII to any third-party organizations.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

5.2   **Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

The PII accountability requirement dictated by agencies are included in contracts with the prime contractors, which then flow down to HRworx as the subcontractor. Contracts establish that all clients own their PII data and that HRworx owns their intellectual property and proprietary documentation, marked as such. The Intelliworx system collects PII as its inherent function.

Development and maintenance of a SORN is the responsibility of the federal agency.

5.3   **How is the information shared outside the Department and what security measures safeguard its transmission?**

Federal agencies that are customers and users of the Intelliworx system provide PII as input to the system.

HRworx individuals are provided access to the Intelliworx system in accordance with established account provisioning and management processes that take into account personnel screening requirements from the agency. Additionally, HRworx provides security awareness training to all employees and displays a warning banner each time an individual logs onto the

system, describing that unauthorized or improper use may result in disciplinary action and civil and criminal penalties.

5.4   Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1   Does this system require a SORN and if so, please provide SORN name and URL.

Not applicable. Development and maintenance of a SORN is the responsibility of the federal agency.

6.2   Was notice provided to the individual prior to collection of information?

Federal agency customers populating the system with PII is integral to the business processes of the Intelliworx system. HRworx only populates the Intelliworx system with PII during the initial onboarding of customers, if the federal agency provides the data to be loaded into the system.

The PII is integral to the business processes of the Intelliworx system.

6.3   Do individuals have the opportunity and/or right to decline to provide information?

Within the FDonline module, individual are not able to opt-out of providing PII or consent to only a particular use. The PII collected and used is required by the Office of Government Ethics (OGE). Declining to provide PII effectively declines employment.

6.4   Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

The Onboarding module provides the individual the option to opt-out of providing PII related to the individual's race/ ethnicity. Other PII data is required by agencies for the onboarding processes.

6.5   **Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

HRworx has not established a privacy policy for the Intelliworx system.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1   **What are the procedures that allow individuals to gain access to their information?**

New hires have the ability to login to the Onboarding module, review the PII that is being maintained, and updated their PII throughout the onboarding process.

Filers within the FDonline module are required to update their PII on an annual basis when reporting their financial assets. Individuals filers can work with the agency's designated ethics administrators to request access to their records and reopen a filing if PII needs to be updated for the current filing year.

7.2   **What are the procedures for correcting inaccurate or erroneous information?**

In addition to automated formatting validation within the software, HRworx verifies bank routing numbers within the onboarding module against the Federal Reserve FedACH routing directory.

It is required of the agency to implement processes that verify accuracy of the PII collected.

7.3   **How are individuals notified of the procedures for correcting their information?**

New hires have the ability to login to the Onboarding module, review the PII that is being maintained, and updated their PII throughout the onboarding process.

Filers within the FDonline module are required to update their PII on an annual basis when reporting their financial assets. Individuals filers can work with the agency's designated ethics administrators to request access to their records and reopen a filing if PII needs to be updated for the current filing year.

7.4   **If no formal redress is provided, what alternatives are available to the individual?**

The PII is considered to be current as it is entered directly by the individual at the time of onboarding or filing. Individuals are responsible for entering accurate PII and maintaining currency of the data submitted.

7.5   Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

The Intelliworx system collects PII within the following fields for the inherent purposes of onboarding new hires and filing financials disclosure forms.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1   What procedures are in place to determine which users may access the system and are they documented?

HRworx utilizes a role-based approach for Intelliworx system account management activities. Access to the Intelliworx system, and the PII fields contained within, is limited to HRworx personnel with an Application, Infrastructure, or Security Administrator role supporting the Intelliworx system. Individuals are only granted access to functionality necessary to accomplish assigned tasks and responsibilities, such an application support and system administration.

8.2   Will Department contractors have access to the system?

HRworx does not have contractors supporting the Intelliworx system.

8.3   Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

HRworx includes privacy training in the annual security awareness training provided to Intelliworx support personnel.

8.4   Has Certification & Accreditation been completed for the system or systems supporting the program?

No

8.5   What auditing measures and technical safeguards are in place to prevent misuse of data?

HRworx individuals are provided access to the Intelliworx system in accordance with established account provisioning and management processes that take into account personnel screening requirements from the agency. Additionally, HRworx provided security awareness training to all employees and displays a warning banner each time an individual logs onto the system, describing that unauthorized or improper use may result in disciplinary action and civil and criminal penalties.

8.6   Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Both customer and HRworx are responsible for safeguarding the information.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1   What type of project is the program or system?

AWS GovCloud

9.2   Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

N/A

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1   Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 "Guidance for Online Use of Web Measurement and Customization Technology" and M-10-23 "Guidance for Agency Use of Third-Party Websites and Applications"?

Yes

10.2 What is the specific purpose of the agency's use of 3rd party websites and/or applications?

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

The FDonline module does not provide PII to any third-party organizations.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

10.3 What personally identifiable information (PII) will become available through the agency's use of 3rd party websites and/or applications.

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

10.4 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be used?

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

10.5 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be maintained and secured?

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

The FDonline module does not provide PII to any third-party organizations.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

10.6 Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically?

Once data has reached the six (6) year maximum retention period within FDonline, records are moved to a queue where customers (e.g., data owners) must designate whether the record can be purged or if the record needs to be held.

Once data within the onboarding module has reached the end of the ninety (90) day retention period, it is automatically purged from the system, as long as certain conditions are met (e.g., the process cannot be ongoing).

The Intelliworx system does not maintain reports that contain PII as there is no need or business process that necessitates this.

10.7 Who will have access to PII that becomes available through the agency's use of 3ʳᵈ party websites and/or applications?

HRworx personnel are granted access to the Intelliworx system based on role, and have only access to functionality that is necessary to accomplish assigned tasks and responsibilities, such as application support and system administration. Access and authorization requests are documented and authorized and approved by the individual's manager and the HRworx Security officer prior to account creation.

New hires have the ability to login to the Onboarding module, review the PII that is being maintained, and updated their PII throughout the onboarding process.

10.8 With whom will the PII that becomes available through the agency's use of 3ʳᵈ party websites and/or applications be shared - either internally or externally?

Internally

The Onboarding module sends required PII (basic personal details, tax information) to the USDA's National Finance Center (NFC) empowHR system for payroll purposes.

The FDonline module does not provide PII to any third-party organizations.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

10.9 Will the activities involving the PII that becomes available through the agency's use of 3ʳᵈ party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Not applicable

10.10 Does the system use web measurement and customization technology?

Not applicable

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Not applicable

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3ʳᵈ party websites

and/or applications, discuss the privacy risks identified and how they were mitigated.

Customers of the Intelliworx system establish the criteria for granting system account access to the PII managed by the customer.

Responsible Officials

Approval Signature

_____   _____
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Authorizing Official
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