

U.S. Securities and Exchange Commission

**HR4Me
PRIVACY IMPACT ASSESSMENT (PIA)**



August 30, 2023

Office of Human Resources

Privacy Impact Assessment

HR4Me

Section 1: System Overview

1.1 Name of Project or System

HR4Me

1.2 Is the system internally or externally hosted?

- Internally Hosted (SEC)
Externally Hosted
 (Contractor or other agency/organization) Tyler Federal, LLC

1.3 Reason for completing PIA

- New project or system
 This is an existing system undergoing an update
First developed: 10/21/2013
Last updated: 5/27/2020
Description of update: HR4Me changed from internally hosted to operating in the Tyler Federal Cloud.

1.4 The system or program employs the following technologies. (*Check all that apply*)

- Electronic Data Warehouse (EDW)
 Social Media
 Mobile Application (or GPS)
 Cloud Computing Services
 Web Portal
 None of the Above

Section 2: Authority and Purpose of Collection

2.1 Describe the project and its purpose or function in the SEC's IT environment

HR4Me is used by the Office of Human Resources (OHR) to automate business processes. HR4Me receives a daily census file from the Enterprise Human Capital Repository (EHCR) and sends employee work schedules, reimbursement activity, and other information to EHCR. The following business process workflows are provided in HR4ME:

- **Awards** – Manages approval workflow for workplace awards and allows users to recommend other users for awards.
- **WorkSmart** – Used to input work schedules and request telework.
- **Student Loan Repayment Program (SLRP)** – Allows creation of a new repayment plan, tracks existing plan requests, and maintains Service Agreements on the User Profile. This module moves the SLRP records through the SLRP approval workflow.
- **Professional for Dues Reimbursement (PDR)** – Creates a new PDR or views existing PDR requests. This module moves the PDR records through the PDR approval workflow.
- **Professional Liability Insurance Reimbursement (PLIR)** – Creates a new PLIR or views existing PLIR requests. This module moves the PLIR records through the PLIR approval workflow.
- **Outside Employment Request (OEM)** – Creates a new OEM or views existing OEM requests. This module moves the OEM records through the OEM approval workflow.
- **Pay Setting Request (PSR)** – Creates a new PSR or views existing PSR requests. This module moves the PSR records through the PSR approval workflow.
- **Incentives** – Creates a new Incentive or views existing Incentives. This module moves the Incentives records through the Incentives approval workflow.

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- **Leave** – Allows users to request Sick Leave, request to use Family and Medical Leave Act (FMLA), request Leave Bank hours, donate to the Leave Bank, and request Exigency and Leave Restoration. This module moves the Leave records through the Leave approval workflow.
- **Pre-Tax Parking (PTP)** – Creates a new PTP or views existing PTP requests. This module moves the PTP records through the PTP approval workflow.
- **Budget** – Keeps track of money allocations for: Awards, SLRP, PDR, PLIR, Incentives.
- **User Profile** – Views and updates user profile, accesses any approved Service Agreements, Bar/License Certifications, PDR, PLIR, or OEM records. Data for this comes from EHCR via an encrypted file through the SEC Data Feed process that is imported to create a user profile in the system that, then, tracks some of the user activities and creates records in User profile to centralize data access.

2.2 What specific legal authorities, arrangements, and/or agreements allow the information to be collected?

5 U.S. Code § 11001 Enhanced Personnel Security Programs, and authorities cited in system of records notice (SORN) SEC-10 Personnel Management Employment and Staffing, 83 FR 6892 (February 15, 2018) are: 5 U.S. Code § 3101, General authority to employ; 5 U.S. Code § 3109, Employment of experts and consultants; temporary or intermittent; Executive Orders 9397, as amended by 13478, 9830, and 12107; and Civil Service Regulations promulgated thereunder.

2.3 Does the project use, collect, or maintain Social Security numbers (SSNs)? *This includes truncated SSNs.*

No

Yes

If yes, provide the purpose of collection:

If yes, provide the legal authority:

2.4 Do you retrieve data in the system by using a personal identifier?

No

Yes, a SORN is in progress

Yes, there is an existing SORN

[SEC-10](#) Personnel Management Employment and Staffing, 83 FR 6892 (February 15, 2018)

2.5 Is the information covered by the Paperwork Reduction Act of 1995 (PRA)?

No

Yes

2.6 Considering the purpose of the collection, what privacy risks were identified and how were those risks mitigated?

There is a risk that information provided for the purpose of the collection may be used for an unauthorized purpose. To mitigate this risk, the collection is limited to only that information identified in section 3.1 to fulfill the authorized purpose.

Section 3: Data Collection, Minimization, and Retention

3.1 What information is collected, maintained, used, or disseminated about individuals? *Check all that apply.*

The system does not collect, maintain, use, or disseminate information about individuals.

Identifying Numbers

Social Security Number

Alien Registration

Financial Accounts

Taxpayer ID

Driver's License Number

Financial Transactions

Employee ID

Passport Information

Vehicle Identifiers

File/Case ID

Credit Card Number

Employer ID

Other: File/Case ID refers to the unique record number assigned by the module in the system.

General Personal Data

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- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Name | <input checked="" type="checkbox"/> Date of Birth | <input type="checkbox"/> Marriage Records |
| <input type="checkbox"/> Maiden Name | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Financial Information |
| <input type="checkbox"/> Alias | <input checked="" type="checkbox"/> Home Address | <input checked="" type="checkbox"/> Medical Information |
| <input checked="" type="checkbox"/> Gender | <input type="checkbox"/> Telephone Number | <input type="checkbox"/> Military Service |
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Mother's Maiden Name |
| <input type="checkbox"/> Race/Ethnicity | <input type="checkbox"/> Education Records | <input type="checkbox"/> Health Plan Numbers |
| <input type="checkbox"/> Civil or Criminal History | <input checked="" type="checkbox"/> Zip Code | |
| <input checked="" type="checkbox"/> Other: Student/parent loan information; information related to outside employment; documentation related to leave requests under FMLA, Sick Leave, Leave Bank, and Leave Transfer. | | |

Work-Related Data

- | | | |
|--|--|--|
| <input type="checkbox"/> Occupation | <input checked="" type="checkbox"/> Telephone Number | <input checked="" type="checkbox"/> Salary |
| <input checked="" type="checkbox"/> Job Title | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Work History |
| <input checked="" type="checkbox"/> Work Address | <input type="checkbox"/> Certificate/License Number | <input type="checkbox"/> Business Associates |
| <input type="checkbox"/> PIV Card Information | <input type="checkbox"/> Fax Number | |
| <input type="checkbox"/> Other: | | |

Distinguishing Features/Biometrics

- | | | |
|--|---|--|
| <input type="checkbox"/> Fingerprints | <input type="checkbox"/> Photographs | <input type="checkbox"/> Genetic Information |
| <input type="checkbox"/> Voice Recording | <input type="checkbox"/> Video Recordings | <input type="checkbox"/> Voice Signature |
| <input type="checkbox"/> Other: | | |

System Administration/Audit Data

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> User ID | <input checked="" type="checkbox"/> Date/Time of Access | <input type="checkbox"/> ID Files Accessed |
| <input type="checkbox"/> IP Address | <input type="checkbox"/> Queries Ran | <input type="checkbox"/> Contents of Files |
| <input type="checkbox"/> Other: | | |

3.2 Why is the PII listed in Question 3.1 collected, used, shared, or maintained by the system or project?

PII collected in HR4ME allows OHR to maintain a repository of employee information and provide HR services to SEC employees.

3.3 Whose information may be collected, used, shared, or maintained by the system?

- SEC Employees
Purpose: Data is collected to process employee requests for HR services.
- SEC Federal Contractors
Purpose:
- Interns
Purpose:
- Members of the Public
Purpose:
- Employee Family Members
Purpose:
- Former Employees
Purpose:
- Job Applicants
Purpose:
- Vendors
Purpose:
- Other:
Purpose:

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3.4 Describe the PII minimizing mechanisms and if the PII from the system is being used for testing, training, and/or research efforts.

The system collects only required information through forms to minimize the amount and types PII collected. PII is not used for testing, training, or research.

3.5 Has a retention schedule been established by the National Archives and Records Administration (NARA)?

Yes.

- Sick Leave Records: Time and attendance records DAA-GRS-2016-0015-0003 (GRS 2.4 Item 30)
- PSR Records DAA-0266-2017-0005-0001
- SLRP Records: Unsuccessful Applicants DAA-0266-2016-0013-0001
- SLRP Records: Successful Applicants DAA-0266-2016-0013-0002
- Awards DAA-GRS-2017-0007-0003 (GRS 2.2 Item 30)
- DARTS DAA-GRS-2016-0015-0003 (GRS 2.3 Item 21)
- Employee Relations/Labor Relations DAA-GRS-2015-0007-0015, DAA-GRS-2015-0007-0016 (GRS 2.4 Items 50,51,52)
- Leave Bank DAA-GRS-2016-0015-0009 (GRS 2.4 Item 71)
- FMLA DAA-GRS-2016-0015-0020 (GRS 2.4 Item 141)
- Leave Transfer DAA-GRS-2016-0015-0009 (GRS 2.4 Item 71)
- Leave Restoration DAA-GRS-2016-0015-0009 (GRS 2.4 Item 71)
- Outside Employment DAA-GRS-2016-0006-0001 (GRS 2.8 Item 10)
- Incentives DAA-0266-2017-0015-0011 (GRS 2.4 Item 90)
- Professional Dues Reimbursement (PDR) DAA-0266-0015-0011 (GRS 2.4 Item 90)
- PLIR DAA-0266-0015-0011 (GRS 2.4 Item 90)
- Pre-Tax Parking DAA-GRS-2016-0015-0018 (GRS 2.2 Item 131)
- WorkSmart DAA-GRS-2015-0007-0022 (GRS 2.3 Item 81)
- Speaker Vetting DAA-GRS2016-00050003 (GRS 6.4 Item 30)

3.6 What are the procedures for identification and disposition at the end of the retention period?

HR4Me module program owners identify the records to be disposed of and provide a list to the System Administrator who works with Tyler Federal to remove them in accordance with the applicable retention schedule identified in section 3.5.

3.7 The system will monitor the following: (Check all that apply)

N/A

Members of the Public

Purpose:

Employees

Purpose:

Contractors

Purpose:

3.8 Considering the type of information collected, what privacy risks were identified and how were those risks mitigated?

The privacy risk related to the information collected is inadvertent disclosure. The risk is mitigated by employing role-based access control to limit authorized user access to only the information needed to fulfill their job duties.

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4.1 What forms of privacy notice were provided to the individuals prior to collection of data? *Check all that apply.*

- Privacy Act Statement
A link to the Privacy Act Statement is provided to users on the HR4Me landing page.
- System of Records Notice
SEC-10 Personnel Management Employment and Staffing Files is not provided to individuals prior to collection but is published in the Federal Register and available on the SEC's website, www.sec.gov.
- Privacy Impact Assessment
The PIA is not provided to individuals prior to collection, but is published on the SEC's website, www.sec.gov
- Web Privacy Policy
- Other notice:
- Notice was not provided.

4.2 Considering the method(s) of notice provided, what privacy risks were identified regarding adequate notice and how were those risks mitigated?

The risk to privacy is minimal because adequate notice is provided as identified in section 4.1.

Section 5: Limits on Uses and Sharing of Information

5.1 What methods are used to analyze the data?

Data is analyzed via search and reporting capabilities, which may present existing information in the form of reports, graphs, charts, and related program management metrics. Reports are generated by OHR program managers.

5.2 Will internal organizations have access to the data?

- No
- Yes

Organizations: SEC employees in all divisions and offices have access to their own data.

5.3 Describe the risk to privacy from internal sharing and describe how the risks are mitigated.

The privacy risk associated with internal sharing is inadvertent disclosure of information. This risk is mitigated by encrypting data and employing access control to restrict access to only information that was entered in the system by an authorized user.

5.4 Will external organizations have access to the data?

- Yes

Organizations: Department of Interior (DOI).

5.5 Describe the risk to privacy from external sharing and describe how the risks are mitigated.

The privacy risk associated with the external sharing is inadvertent disclosure of information to unauthorized individuals. This risk is mitigated by using an encrypted SEC Feeds to transmit information to DOI's Secure File Transfer Protocol site.

Section 6: Data Quality and Integrity

6.1 Is the information collected directly from the individual or from another source?

- Directly from the individual.
- Other source(s): EHCR

6.2 What methods will be used to collect the data?

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SEC employees enter information directly into HR4Me modules listed in Section 2.1. As information moves through the workflow process, OHR staff and other SEC management personnel may enter additional information when necessary. In addition, data is ingested daily from EHCR into HR4Me.

6.3 How will the data collected from individuals, or derived by the system, be checked for accuracy and completeness?

Employees have direct access to HR4Me and can review their personal information to check for accuracy and completeness. When employees submit records in HR4Me they are required to submit an electronic signature to certify the information they provided is accurate.

6.4 Does the project or system process, or access, PII in any other SEC system?

Yes.

System(s): EHCR

6.5 Consider the sources of the data and methods of collection and discuss the privacy risk for this system related to data quality and integrity? How are these risks mitigated?

The risk to privacy related to data quality and integrity is minimal because SEC employees certify the accuracy of the information they entered in the system as described in section 6.3. In addition, employees may contact an OHR administrative officer to resolve data accuracy issues.

Section 7: Individual Participation

7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

SEC employees may decline to provide information in HR4Me. However, if they decide not to provide information, payment processing or other aspects of federal employment may be adversely impacted.

7.2 What procedures are in place to allow individuals to access their information?

SEC employees may directly access HR4Me by accessing their user profile from the HR4me home page.

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

SEC employees can only update supervisor information in HR4Me. If an employee believes their data is incorrect, they may submit an 'HR Data Correction Request' via the askHR portal.

7.4 Discuss the privacy risks related to individual participation and redress? How were these risks mitigated?

The primary privacy risk is storing outdated employee information in the system. This risk is mitigated because SEC employees can access HR4Me directly to update information as discussed in 7.3 or they may contact an OHR Administrative Officer to amend information not available for direct update by employees.

Section 8: Security

8.1 Can the system be accessed outside of a connected SEC network?

No

8.2 Does the project or system involve an online collection of personal data?

No

8.3 Does the site have a posted privacy notice?

N/A HR4Me has no public/external facing interface

Section 9: Accountability and Auditing

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9.1 Describe what privacy training is provided to users, either general or specific to the system or project.

All SEC staff and contractors receive initial and annual privacy awareness training, which outlines roles and responsibilities for proper handling and protection of PII. SEC Rules of the Road ensure that employees and contractors are aware of their security responsibilities and how to fulfill them.

9.2 Does the system generate reports that contain information on individuals?

Yes

9.3 Do contracts for the system include Federal Acquisition Regulation (FAR) and other applicable clauses ensuring adherence to the privacy provisions and practices?

Yes

9.4 Does the system employ audit logging or event logging?

Yes

9.5 Given the sensitivity of the PII in the system, manner of use, and established safeguards, describe the expected residual risk related to access.

The residual risk related to access is the inadvertent disclosure of sensitive PII. This risk is mitigated by limiting access to authorized SEC employees using multifactor authentication and restricting the level of user access using role-based access controls.