Federal Trade Commission Privacy Impact Assessment

Federal Human Resources Navigator

(FHR Navigator)

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1 System Overview

1.1 Describe the project/system and its purpose.

Federal Human Resources (FHR) Navigator is a collection of software tools owned by Economic Systems, Inc. (EconSys) and used by the Federal Trade Commission (FTC) to navigate and facilitate human resources functions for all FTC employees. FHR Navigator is hosted remotely at a commercial facility; EconSys provides the FTC with access to the platform and website through its secured servers. The data will be stored on EconSys' secure servers and accessible only to authorized FTC and EconSys staff. The most prominent tool within the FHR suite is the Federal Retirement Benefits (FRB) Web, which employees can use to calculate and better understand their benefits. The system allows for more streamlined retirement planning and personal information management. Another key function of FHR Navigator is the Forms Manager, which includes access to over 150 federal forms. These forms can be completed and filed electronically, reducing waste and increasing efficiency within the FTC Human Capital Management Office (HCMO). In the event that an employee transfers to another federal agency, this system allows for a smooth transition of information.

Information in FHR Navigator is compiled from personnel data collected and maintained in the U.S. Department of Interior's Federal Personnel & Payroll System (FPPS). A bi-weekly file is generated by FPPS that contains employee information such as:

• Social Security Number (SSN) – ensures that the correct employee and salary data are associated with the correct individualB \grave{O} ""áá 68ψ u . \hat{A} * \check{S} C! ψ f •632!•

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1.2 What specific legal authority allows for the collection, maintenance, or dissemination of information for this project/system?

Information maintained in FHR Navigator is collected, maintained, and disseminated pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41 *et seq*.

2 Data Type, Sources, and Use

2.1 Specify in the table below what types of personally identifiable information (PII)¹ may be collected or maintained in the system/project. Check <u>all</u> that apply.

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2.3 What is the purpose for collection of the information listed above?

FHR Navigator provides helpful tools for employees to better understand and plan for their retirement and financial future. The PII collected is necessary for account validation and to provide accurate calculations and figures based on the employee's specific information.

2.4 What are the sources of the information in the system/project? How is the information collected?

Source of Data	Type of Data Provided & How It Is Collected
Federal Personnel &	All position, personnel, payroll, and leave information for each FTC
Payroll System (FPPS)	employee is collected and maintained in the U.S. Department of
	Interior's FPPS

Data Will Be Accessed By and/or Provided To:	How and Why the Data Will Be Accessed/Shared		
Economic Systems	necessary. Access for employees who separate from the FTC will be available for 60 days after separation. Then their profile will be converted to inactive and access will no longer be available. The data for that separated employee will be stored in FHR Navigator for two years after separation, then be destroyed, as per FTC's records management schedule. For employees who transfer from the FTC to another government agency, the data within FHR Navigator will be transferred to their new agency within two weeks of their exit from the Commission. They will no longer be able to access FHR Navigator via their FTC profile after the data is transferred to their new agency. EconSys will be providing the platform and website through their secure		
(EconSys) Inc.	servers. The data will be stored on EconSys' secure servers and accessible only to authorized staff. If problems arise with use of the system, certain members of the EconSys help desk staff may be required to access FTC employees' data to resolve issues. When an employee leaves the FTC (whether through retirement or transfer to another place of employment), the FTC notifies EconSys; EconSys then updates the information in the FHR Navigator system to reflect the change. Data in the FHR Navigator system is backed up every 24 hours to keep it as current as possible.		

3.2 Do contractors and/or third party service providers have access to data in the project/system? If yes, explain what privacy requirements are in place to ensure that data is properly protected.

Yes, EconSys employees have access to the FHR Navigator application and are required to sign a non-disclosure agreement with the FTC. EconSys employees ensure that privacy responsibilities and procedures are included in the security awareness training, which is identical to the Department of Homeland Security (DHS) IT Security Awareness and Privacy training. Role based training is provided to individuals with responsibility for handling PII and privacy requirements.

3.3 If you answered "yes" to 3.2, describe the privacy incident response plan maintained by the contractor's organization or third party service provider.

EconSys maintains an incident response plan that addresses requirements and guidance set forth by the Federal Information Security Modernization Act (FISMA) and includes FedRAMP specific control parameters. It also encompasses minimum security requirements as set forth by the Federal Information Processing Standard (FIPS) 800-53, Revision 4. As part of EconSys' annual assessment, the company reviews its incident response plan and conducts incident response training for its staff. As stated in its incident response plan, EconSys will report incidents detected within FHR Navigator to all affected customer agencies based on the categorization of the incident. For example, all incidents related to unauthorized access or PII

will be reported to US-CERT within one hour of awareness via telephone and followed up with an email; subsequently, it will notify the affected agency regarding the nature and scope of the incident.

4 Notice and Consent

4.1 How are individuals provided with notice prior to the collection of their PII? If notice is not provided, explain why.

A preliminary HCMO email will be sent out to new FTC employees about the collection of their PII

4.4 Are there procedures in place to allow individuals the ability to correct inaccurate or erroneous information? What is the process for receiving and responding to complaints, concerns, or questions from individuals? Explain.

Data received from FPPS and subsequently uploaded to FHR Navigator cannot be changed by anyone other than HCMO staff and HR Administrators/Specialists. Incorrect data will first need to be changed in FPPS; once this has been completed, the updated information will be downloaded/uploaded via the process identified in Section 2.4, thus correcting the data in FHR Navigator. If employees notice that information regarding their retirement plans or other benefits is incorrect, they must contact HCMO and request the change or update. It is the policy of HCMO to respond to the request within two business days.

Employees do have the ability to add or modify limited information within the system such as information from their Thrift Savings Plan account. When completing forms directly via FHR Navigator, individuals have the opportunity to verify the accuracy of their information before submitting the form. Additionally, if individuals choose not to submit the forms via FHR Navigator, they have the option of filling them out manually, verifying the information is accurate, and submitting them in hardcopy form to HCMO.

5 Data Accuracy and Security

5.1 Are there procedures in place to ensure that the information maintained is accurate, complete, and up-to-date?

The information is transferred from FPPS into FHR Navigator via the process described in Section 2.4. If an employee notices the information maintained about them in FHR Navigator is inaccurate, the employee must notify HCMO in order to correct the discrepancy. See 4.4.

5.2 Are there administrative procedures and technical safeguards in place to protect the data in the system/project? What controls are in place to ensure proper use of the data? Please specify.

HCMO staff are responsible for assigning roles and access rights for FTC users. Authorized EconSys staff have access to the system for maintenance and troubleshooting purposes. The FHR Navigator interface gives administrative users access to PII only on a role and need-to-know basis. Individuals in roles where the information is necessary for the completion of tasks will be given access to said information at the discretion of the system administrators and data managers. All data in FHR Navigator is encrypted and stored in a secure EconSys server; the data is restricted to authorized users in a locked facilitye respoT0.002 Tc -0.002v5 (i)-1r1 (f)-1 (n F)6psHs

5.3 Is PII used in the course of system testing, training, or research?	If so, what steps are
taken to minimize and protect PII during this process?	

Not Applicable

Only fictitious or dummy data is used for system testing or training. No real or live PII is used.

6 Data Retention and Disposal

6.1 Specify the period of time that data is retained in the system/project. What are the

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