



# Privacy Impact Assessment

for the

## Office of the Chief Human Capital Officer Talent Acquisition

**DHS Reference No. DHS/ALL/PIA-043(a)**

**September 11, 2020**



**Homeland  
Security**



## Abstract

Talent Acquisition is a Federal Human Capital Business Function whereby federal agencies establish internal programs and procedures for attracting, recruiting, assessing, and selecting employees with the right skills and competencies in accordance with federal merit system principles. Talent Acquisition includes aligning workforce plans to organizational strategies and business needs, recruiting qualified individuals, evaluating candidates, processing suitability determinations, and integrating new employees into the Department. The Department of Homeland Security (DHS) Office of the Chief Human Capital Officer (OCHCO) and DHS Component Human Capital Offices rely on various systems to support Talent Acquisition processes. DHS is conducting this Privacy Impact Assessment (PIA), which updates and replaces the previous DHS Hiring and On-Boarding PIA, because the systems that support Talent Acquisition collect, use, store, and transmit personally identifiable information (PII) and sensitive personally identifiable information (SPII).

## Overview

DHS has a vital mission to ensure a homeland that is safe, secure, and resilient against terrorism, natural disasters, and other hazards. This requires the dedication of more than 240,000 employees in jobs that range from border security to emergency response and from cybersecurity analysts to chemical facility inspectors. To hire and retain a qualified and dedicated workforce, the Department relies on OCHCO and its Component Human Capital Offices to conduct all recruitment, hiring, onboarding, and career process-related activities. This includes developing workforce plans and strategies, creating staffing positions that align with these plans and strategies, developing and posting job announcements, developing and using online and proctored assessment tools to evaluate candidates, producing certificates of referral for hiring managers, processing suitability determinations, extending tentative and final job offers to new employees, and processing new-hires into the Department. Each DHS Component has its own human resources (HR) office that recruits and hires for its Component workforce, with OCHCO serving as the HR office for DHS Headquarters.

OCHCO is leading an ongoing effort to standardize the way the various DHS Component HR offices conduct Talent Acquisition in accordance with the Office of Personnel Management's (OPM) Human Capital Business Reference Model (HCBRM).<sup>1</sup> This entails consulting all of the

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<sup>1</sup> Human Capital Business Functions comprise the HCBRM, which is a model for federal agencies that defines the end-to-end lifecycle of Federal Government Human Capital Management (HCM). The model is used to streamline government-wide HR operations, standardize HR service delivery, simplify HR acquisitions, and drive transparency in the federal budget. OPM categorizes Talent Acquisition in its Human Capital Business Reference Model as Function A2. For more information regarding OPM's HCBRM, and A2 specifically, see U.S. OFFICE OF PERSONNEL MANAGEMENT, FEDERAL HUMAN CAPITAL BUSINESS REFERENCE MODEL (HCBRM),



Component Human Capital Offices to identify the systems and processes they currently rely on to conduct their business, and then working with them to select those systems and processes that are best suited to expand enterprise-wide.<sup>2</sup> This PIA describes the new enterprise workflow for conducting Talent Acquisition at DHS and the systems that support it.<sup>3</sup> Specific information technology (IT) systems used by individual DHS Components that choose not to join all or part of the new enterprise workflow are detailed in the Appendix.

## Hiring Authority

All HR offices within DHS must comply with OPM regulations regardless of whether their Component chooses to adopt all or part of the new DHS-wide Talent Acquisition workflow. Under 5 U.S.C. § 1104, OPM has delegated to agencies the authority to conduct competitive hiring for positions in the federal service. DHS hiring authorities have two fundamental responsibilities under OPM's delegation: 1) to ensure the agency's vacant positions are filled with the best-qualified persons from a sufficient pool of well-qualified eligible candidates,<sup>4</sup> and 2) to uphold the laws, regulations, and policies of merit selection as defined in 5 U.S.C. §§ 2301 and 2302.

With limited exceptions established in law or executive order, members of the public must have an opportunity to compete for vacant federal positions. DHS is therefore responsible for providing public notice of the opportunity to compete by listing job announcements on USAJOBS.gov.<sup>5</sup> DHS is also responsible for establishing policies and procedures for accepting and processing applications from all applicants (including status applicants<sup>6</sup>) and clearly specifying filing instructions and conditions in job announcements. These processes and procedures support the various stages of DHS's Talent Acquisition function, including candidate

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<https://www.opm.gov/services-for-agencies/hr-line-of-business/hc-business-reference-model/hc-brm-interactive-model.pdf>.

<sup>2</sup> Common criteria used to select one Component's systems or process over another for enterprise use include how widely it is already in use by Components, how effective it has been in reducing hiring cycles, how much it costs, and how secure and reliable it has been.

<sup>3</sup> This PIA updates and replaces the previous PIA to account for changes to the Talent Acquisition process and provide a more accurate description of the overall business function. See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE DHS HIRING AND ON-BOARDING PROCESS, DHS/ALL/PIA-043 (2013), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>. The specific systems listed in this PIA may change as DHS continues to evolve its Human Capital Business Functions. DHS will update this PIA or provide entries in an Appendix if functionality changes.

<sup>4</sup> Certain exceptions to hiring have been established by law and executive order with the intent of rewarding prior federal service or ensuring a diverse federal workforce. These are discussed further in this PIA.

<sup>5</sup> USAJOBS.gov is the federal government's website for posting civil service job opportunities with federal agencies. The site is operated by OPM. See U.S. OFFICE OF PERSONNEL MANAGEMENT, PRIVACY IMPACT ASSESSMENT FOR USAJOBS (2005), available at <http://www.opm.gov/privacy/PIAs/USAJOBS.pdf>.

<sup>6</sup> "Status" or "Competitive Status" means a person's basic eligibility for assignment (for example, by transfer, promotion, reassignment, demotion, or reinstatement) to a position in the competitive service without having to compete with members of the general public in an open competitive examination. Once acquired, status belongs to the individual, not to the position. See 5 U.S.C. § 3304(a); 5 CFR 212.301.



recruitment, developing and posting vacancy announcements, processing applications submitted in USAJOBS, evaluating and selecting eligible and qualified candidates, issuing temporary and permanent offers of employment, conducting pre-employment suitability checks, and onboarding candidates who accept offers of employment at DHS.

## Candidate Recruitment

OCHCO's Strategic Recruitment Diversity and Inclusion (SRDI) Division designs, executes, and evaluates Department-wide strategic programs to recruit and retain a diverse workforce, to promote workplace inclusion, and to sustain leadership commitment and management accountability for inclusive diversity policies and practices. SRDI also provides guidance to Components to ensure compliance with regulatory requirements and adequate diversity recruitment practices.

DHS Components are responsible for collecting detailed information on their respective recruitment, outreach, and marketing activities and providing this information to SRDI. The information Components routinely provide to SRDI includes time, date, location, event name, vendor, costs, target audience, recruiters in attendance, and attendee information. Regarding the latter, event hosts typically use attendance rosters to collect attendee names and contact information for future recruitment and follow-up. A Privacy Act Statement appears on the rosters describing the authority for collection, principal purpose of information collected, and routine uses for sharing that information; as well as a disclosure explaining that furnishing the information is completely voluntary and that attendees may opt out of receiving correspondence from DHS at any time by notifying the sender. A similar message is communicated verbally to attendees at the beginning of recruitment and outreach events.<sup>7</sup>

SRDI also frequently hosts recruitment webinars to allow candidates from remote locations to learn about job opportunities at DHS, the application process, and any hiring flexibilities pertinent to them. These webinars are typically marketed via DHS public-facing websites and promotional materials, at schools and veterans' organizations, and via other forums likely to attract classes of applicants DHS is required by law and policy to pursue. To register for a DHS recruitment webinar, individuals<sup>8</sup> are asked to complete a comprehensive registration survey designed to collect information to assist DHS with demonstrating that its outreach efforts follow prescriptive recruitment strategies. The data collected from the survey is also aggregated into analytics reports and dashboards that support decision making around hosting future recruitment

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<sup>7</sup> Components may also have their own recruiting tools and recruitment webinar technology that are described in the Appendix.

<sup>8</sup> Individuals at this phase of the recruitment process usually have not yet submitted applications for open positions at DHS and are attending the webinar or recruitment event to help determine whether they might be interested in doing so.



webinars. The recruitment webinar registration survey results are automatically fed into OCHCO's Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) tool, where they are automatically aggregated to produce the data analytics dashboards and reports.

## *SMORE*

SMORE is an in-house application used by SRDI and senior HR executives to measure and track recruitment activities and to produce dashboards reflecting real-time data analytics and forecasting for recruitment and hiring. The system is designed to eliminate manual data calls and manual tracking via spreadsheets, thus significantly reducing staff time that would have been dedicated to these manual administrative tasks. SMORE currently captures non-PII data pertaining to all DHS Components' recruitment activities and engagement. It also tracks certain PII data about collateral duty recruiters (all of whom are DHS employees) to accurately calculate labor costs and attendance associated with individual recruitment events.<sup>9</sup>

The dashboards and reports generated by SMORE contain graphs and charts that track recruitment expenses by fiscal year, Component, state, type of forum, and targeted audience; number of events by Component and type of forum; marketing expenses by Component, fiscal year, targeted audience, and method of advertisement; and Component participation rates in webinars. Additionally, OCHCO is working to add some privacy-sensitive functionality that would facilitate SRDI's ability to track applicants who have noncompetitive eligibility (NCE)<sup>10</sup> as they move through the hiring process. The information tracked would be limited to name, email, phone, and process status. This PII would be collected directly from applicant resumes, which would be requested at recruitment events of attendees who appear likely to meet NCE requirements.

## Vacancy Announcement Development/Posting

The vacancy announcement process primarily involves hiring managers who recruit, evaluate, and select candidates for open positions they will supervise, and HR specialists who implement and ensure compliance with federal and DHS hiring rules and procedures. To begin a hiring action, a hiring manager first submits a request to fill a position through his or her assigned

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<sup>9</sup> The PII collected by SMORE pertaining to recruiters includes name, salary (masked in system), grade and step (masked in system), hour rate if applicable (masked in system), total salary cost (masked in system), role at recruitment event, and number of hours spent at event.

<sup>10</sup> NCE allows federal agencies to hire eligible candidates outside of the formal competitive job announcement process and compete for certain federal employment jobs that are only open to federal employees. Examples of individuals with NCE include current or former federal employees, active duty service members, disabled veterans, persons with disabilities, and recently returned Peace Corps volunteers. NCEs are typically defined in legislation, Executive Orders, and OPM regulations. Since the U.S. Government prioritizes hiring these categories of individuals into the federal service as a matter of public policy, DHS and other agencies typically rely on metrics to track their success in recruiting and hiring them.



HR specialist. The HR specialist then works with the hiring manager and other HR professionals to determine the appropriate position classification (title, series, grade level), job qualification requirements, pay plan (General Schedule or other pay system), and bargaining unit status.<sup>11</sup> Once these determinations are settled, the HR specialist creates a vacancy announcement in OPM's USA Staffing<sup>12</sup> system or DHS's Commercially Available Staffing Services (CASS),<sup>13</sup> depending on which system the HR specialist's Component relies on.<sup>14</sup> Once the HR specialist creates the announcement, he or she posts it on USAJOBS.

### Application Completion/Submission

Applicants typically apply for federal jobs on USAJOBS. To apply, an applicant must first create a profile in the system, a process that requires the collection of name, address, email, phone, citizenship status, selective service registration status, highest education obtained, and hiring path status.<sup>15</sup> Additionally, users are prompted to upload one or more resumes, as well as any supporting documents they foresee using with regularity in future applications. Once they create their profile, users may search for job announcements based on various criteria including agency, job series, grade, location, and salary range. Users may also rely on their profile to save job announcements of interest and tailor automated jobs searches. Once users identify a vacancy announcement to which they would like to apply, they are prompted to select one resume from their profile and to upload whatever supporting documents are specified in the announcement.<sup>16</sup>

All the information contained on supporting documents is visible to the HR specialists conducting the hiring action. A feature in both USA Staffing and CASS permits HR specialists to allow or deny hiring managers the ability to view specific supporting documents, and HR

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<sup>11</sup> A bargaining unit position is a job that is represented by a labor union. More information on federal bargaining units can be found at <https://www.usajobs.gov/Help/faq/job-announcement/bargaining-units>.

<sup>12</sup> USA Staffing is an OPM shared service for automating staffing and assessment. There are two distinct aspects of USA Staffing: a public-facing web page for applicants, which they reach by signing in at USAJOBS; and a separate, interface for the subscribing agencies to perform core HR functions. See U.S. OFFICE OF PERSONNEL MANAGEMENT, PRIVACY IMPACT ASSESSMENT FOR USA STAFFING (2020), available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/usas-pia.pdf>.

<sup>13</sup> CASS is a vendor-managed system that provides the design, architecture, configuration, implementation, and maintenance of an electronic staffing solution. It includes a Personnel Action Request processing tool, an applicant tracking system, an applicant assessment tool, a performance rating and awards tool, a benefits and retirement tracking tool, a job classification tool, and a business intelligence and reporting tool.

<sup>14</sup> Components who choose to adopt part or all of DHS's new Talent Acquisition workflow have the option of relying on USA Staffing or CASS as their onboarding system. Components may also have additional onboarding systems and tools that are described in the Appendix.

<sup>15</sup> Hiring Path Status refers to the different categories to which applicants apply that might make them eligible for special or advantageous hiring considerations. Examples include U.S. citizens, federal employees, veterans, recent graduates, and Native Americans.

<sup>16</sup> If the applicant has not already uploaded a required supporting document into his or her profile, he or she is provided an opportunity to add it at the end of the application process. More information on the types of supporting documents that may be required can be found at <https://www.usajobs.gov/Help/faq/application/documents/>.



specialists are trained to hide from view any documents that contain SPII and that are unrelated to the hiring decision, such as Standard Form (SF)-50s (Notification of Personnel Action form) or disability letters. Typically, HR specialists only allow hiring managers to view applicant resumes, cover letters, and most recent performance evaluations.

Once applicants acknowledge on USAJOBS they have reviewed the resume and whatever supporting documents they chose to submit, users are asked to provide demographic information about themselves and how they heard about the job announcement. Users are informed, however, that providing this information is optional and will have no bearing on their application. If they decide not to share this information, users simply check a box indicating they prefer not to answer.

Next, applicants are taken to the occupational assessment portion of USAJOBS, where they are asked questions related to their eligibility to apply for the position (e.g., time in grade qualifications, acceptable hiring path condition,<sup>17</sup> geographic location) and their qualifications for the specific position (e.g., experience, knowledge, skills, professional licenses). These types of assessment questions are designed by hiring managers and HR professionals at DHS within the USA Staffing or CASS systems themselves.<sup>18</sup> A small number of job announcements also require assessments that measure general competencies such as reasoning skills, decision-making ability, math skills, reading comprehension, interpersonal skills, stress tolerance, and accountability. These types of general cognitive assessments are designed by personnel subject matter experts at OPM and supported by another OPM shared service, USA Hire.<sup>19</sup> Regardless of whether an assessment is general or position-specific, and regardless of whether it is supported by USA Staffing, CASS, or USA Hire, applicants can review, edit, delete, and update their answers to assessment questions as desired. This information is automatically saved so that no changes are lost.

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<sup>17</sup> The various hiring path conditions that may be pertinent to a given job announcement are typically defined in law or executive order with the aim of rewarding prior federal service or ensuring a diverse workforce. Hiring path conditions for a specific job announcement might include Open to the Public, Federal employees-Competitive service, Federal employees-Excepted service, Internal to agency, Career transition (CTAP, ICTAP, RPL), Family of overseas employees, Individuals with a disability, Military spouses, National Guard and Reserves, Native American and Alaskan Natives, Peace Corps and AmeriCorps VISTA, Senior Executives, Special Authorities, Students, Recent graduates, and Veterans. More information on hiring paths can be found at <https://www.usajobs.gov/Help/how-to/account/profile/hiring-paths/>.

<sup>18</sup> For those Components that use CASS, hiring managers can consult with institutional subject matter experts employed by the vendor that supports the system for help with creating occupational assessments.

<sup>19</sup> USA Hire collects candidate assessment information, provided by the job applicant, through USA Staffing and USAJOBS for employment consideration. It is an assessment option that federal agencies may use in combination with agency-specific staffing assessment questions. See U.S. OFFICE OF PERSONNEL MANAGEMENT, PRIVACY IMPACT ASSESSMENT FOR USA HIRE (2018), available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/usa-hire.pdf>. Components that choose to use CASS instead of USA Staffing are also provided access to institutional subject matter experts by the vendor for help with developing general cognitive assessments.



At the end of the occupational assessment portion of the application, users are provided a final opportunity to review and revise their answers and supporting documentation. When submitting their application in the system, users are asked to certify the information they provided is true, complete, and made in good faith. Upon submission, an automated email is sent to the applicant with information and advice about the application process.<sup>20</sup> Users may revise their application at any time up until midnight of the day the job announcement closes. This date is prominently displayed on the USAJOBS announcement itself.

### Candidate Evaluation/Selection

The HR specialists review applications in USA Staffing or CASS based on answers to the eligibility and job qualification questions submitted by applicants through USAJOBS. HR specialists first review the applicant's answers to eligibility questions and relevant supporting documentation to confirm satisfaction of hiring time, grade, series, at least one required hiring path condition, and other eligibility criteria specified in the job announcement. Assuming the HR specialists determine the applicant has satisfied all eligibility requirements, they then review the resume, answers to the online assessment questions, and any other pertinent application materials to determine whether the applicant is qualified based on requisite knowledge, skills, and abilities needed to perform the duties listed in the job announcement. Once the HR specialists determine which applicants are both eligible and qualified, they record this information in USA Staffing or CASS along with the basis for the determinations. USA Staffing or CASS then sends an email notification to each applicant indicating whether he or she was referred to the hiring manager for the position, and if not, the basis for the non-referral.<sup>21</sup>

HR specialists next generate certificates of eligible (certs) that list all the applicants who are both eligible and qualified. Each cert is tied to a specific hiring path condition designated as acceptable in the vacancy announcement. These certs are provided to the hiring manager for the next stage of the selection process, along with the resume of each candidate appearing on at least one of the certs, and any other supporting documentation relevant to the applicant's qualifications to perform in the position.<sup>22</sup> With the exception of some hiring paths specific to veterans,<sup>23</sup> hiring managers may select any name from any cert based solely on the information provided in the

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<sup>20</sup> Periodic notifications regarding the status of the application are also sent to the applicant throughout the course of the hiring process unless the applicant elects in his or her USAJOBS profile not to receive them.

<sup>21</sup> Examples of reasons why an applicant might not be referred include failure to provide required documentation, failure of resume to adequately reflect ability to perform job duties, or failure to meet hiring path requirements based on supporting documentation submitted.

<sup>22</sup> HR specialists typically limit supporting documentation to cover letters and performance evaluations, assuming any were provided by the applicant, in the interest of protecting applicant privacy.

<sup>23</sup> Hiring managers are required to select disabled veterans over other candidates who appear on certs in various circumstances. Information about selection rules regarding veteran hiring preferences can be found at <https://www.fedshirevets.gov/job-seekers/special-hiring-authorities/>.





resume and other supporting documentation. More commonly, however, hiring managers choose to also conduct interviews with top candidates and to check professional references.

Certs at DHS are valid for up to 240 days, meaning that hiring managers can request HR specialists to reissue a cert if a candidate drops out of the hiring process anytime within the 240-day window. If more than 240 days have elapsed since the HR specialist issues a cert at the point a candidate drops out or becomes ineligible for employment, the hiring manager must reissue the job announcement and start the hiring process over again.

Interviews may be conducted by phone, in person, or by other means. To coordinate an interview, hiring managers or their support staff typically reach out to applicants they would like to interview directly by using the contact information contained on the applicants' resumes. The hiring manager may conduct the interviews one-on-one or choose to organize an interview panel. Interviewers develop questions in advance or extemporaneously during the course of the interview, but all questions must pertain to the applicant's ability to successfully perform in the position.<sup>24</sup> Interviewers are strongly encouraged to take interview notes in case the selection is challenged, and any notes taken by interviewers become federal records.

Reference checks are also usually conducted by hiring managers; outreach to references may occur by phone, email, or by any other means specified by the applicant. If the applicant did not already provide reference contact information in the resume, the hiring manager may reach out to the applicant directly for this information using the applicant's contact information listed on the resume. Questions asked of references must directly pertain to the reference's knowledge regarding the applicant's ability to perform the duties of the position. Reference contact information may not be used for any reason other than conducting the reference checks and should be destroyed once the reference checks are complete.

The hiring manager may ultimately select as many candidates from the certs as were specified in the job announcement based on his or her review of application materials and the results of any interviews and reference checks. Once all selections are made, the hiring manager provides the names of the selectees to HR specialists via USA Staffing or CASS. HR specialists then send temporary job offer letters (TJO) to each selectee informing them they have been tentatively selected for the position and the conditions under which the tentative offer is being made. The TJO also explains that a final offer is subject to a criminal background check, a drug screening (if applicable), and other suitability determinations relevant to the position.<sup>25</sup> Selectees who indicate their acceptance of the TJO begin the onboarding process. If a selectee declines the

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<sup>24</sup> Likewise, hiring managers may not ask about personal information unless the answer would likely bear directly on job performance.

<sup>25</sup> Other suitability determinations may include ability to obtain a required clearance level, validation that the candidate holds a required professional license or certification.



temporary offer, the HR specialist informs the hiring manager and the hiring manager may ask the HR specialist to reissue certs from the same job announcement so long as 240 days have not elapsed.<sup>26</sup>

## TJO Case Records Creation

Candidates who accept TJOs are required to complete and upload certain pre-security forms, a current copy of their resume, and proof of any certifications that may be required for the position into the online portal of USA Staffing or CASS. The pre-security forms, all of which contain Privacy Act Statements, consist of:

- Optional Form (OF)-306, Declaration for Federal Employment – used to determine acceptability for federal and federal contract employment, and enrollment status in the Government’s Life Insurance Program;
- DHS-110005, Pre-Screen for Clearance Form – used to verify data that will be used to conduct a background investigation on the candidate suitable to the clearance level required for the position; and
- DHS-110009, DHS Credit Release Form – signed release permitting DHS to obtain credit reports from consumer/credit reporting agencies.

Once uploaded, data elements from the forms are automatically extracted and sent to DHS’s Enterprise Information Environment (EIE),<sup>27</sup> including the candidate’s Social Security number (SSN) as listed on the OF-306. EIE then automatically sends a request via a secure connection to DHS’s Integrated Security Management System (ISMS)<sup>28</sup> to ensure a case record exists in the system that includes a person handle.<sup>29</sup> If the candidate is a former DHS employee, a case record

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<sup>26</sup> If 240 days have elapsed since the original selection was made, the hiring manager must repost the job announcement and start the hiring process over again.

<sup>27</sup> EIE is a collection of hardware, software, and online data storage that supports the business and information needs of OCHCO. The system serves as a consolidated authoritative source for human capital information across the Department, and it functions as a data broker among all enterprise-level HR systems at DHS. To support its information-sharing role, EIE houses a secure data repository containing personnel data on every employee at DHS. For an in-depth discussion of EIE, including the type of data it retains and the other systems to which it interconnects, see U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR WORKFORCE ANALYTICS AND EMPLOYEE RECORDS, DHS/ALL/PIA-075 (2019), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.

<sup>28</sup> ISMS is a DHS-wide web-based case management application designed to support the lifecycle of the DHS personnel security, administrative security, and classified visit management programs. See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE INTEGRATED SECURITY MANAGEMENT SYSTEM (ISMS), DHS/ALL/PIA-038 (2011 and subsequent updates), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.

<sup>29</sup> Person handle is a unique personal identifier that is assigned to every DHS employee and contractor at the time he or she accepts a TJO or is onboarded. It was developed for use in lieu of SSN to reduce privacy risks to DHS personnel and is used in various system throughout the Department. EIE sends ISMS the SSN of the candidate as listed on the OF-306 via a secure connection. ISMS then associates a person handle to the SSN and returns this



will already exist, and ISMS will locate the record, update it with information collected in the pre-security forms and uploaded resume, and rely on it for the remainder of the Talent Acquisition process. If the candidate has never been employed at DHS, ISMS will create a new case record that includes a new person handle. Either way, the candidate's new or updated case record is returned to EIE and the online portal of USA Staffing or CASS is updated to show that the case records were created and that the pre-security forms and resume have been stored in ISMS.

### Pre-Employment Suitability Checks

Once the candidate uploads the pre-security forms, updated resume, and any required proof of certifications into the USA Staffing or CASS onboarding portal, and after the candidate's case record is created or updated via a system request from EIE to ISMS, the process for conducting the candidate's pre-employment suitability checks can begin. These suitability checks consist of an initial reciprocity determination within OPM's Central Verification System (CVS)<sup>30</sup> for those candidates that are former federal employees, a drug test for most positions,<sup>31</sup> a fingerprint collection for those candidates without reciprocity, and a credit check for all candidates regardless of job history or prospective position. The candidate is required to schedule the drug test and fingerprint appointment directly from the USA Staffing or CASS onboarding portal via links to the providers' scheduling systems. The credit checks are conducted by the appropriate personnel security office at DHS (PerSec)<sup>32</sup> using information collected on the DHS-110005 form, and per the consent granted by the signed release on the DHS-110009 form, with no need for additional action required from the candidate.<sup>33</sup>

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information to EIE via the same secure connection. This eliminates the need of SSN being used unnecessarily throughout the Department.

<sup>30</sup> CVS is designated as the primary tool for facilitating reciprocal decisions, as required by Executive Orders, regulations, and policies. CVS contains information on security clearance, suitability, fitness, and Homeland Security Presidential Directive 12 (HSPD-12) Personal Identity Verification (PIV) credentialing determinations for current and former federal employees. The information is provided by agency sources, legacy personnel security systems, and a bridge to the Department of Homeland Security Joint Personnel Adjudication System. For more information about CVS, and about OPM's role in federal background investigations generally, *See* U.S. OFFICE OF PERSONNEL MANAGEMENT, PRIVACY IMPACT ASSESSMENT FOR THE PERSONNEL INVESTIGATIONS PROCESSING SYSTEM (PIPS) (2017), available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/pips-pia.pdf>.

<sup>31</sup> Some DHS Components do not require drug tests for employees who are moving to new positions within the Component and who had a previous drug test while working in the Component.

<sup>32</sup> Each Operational Component at DHS has its own personnel security office that screens job candidates for positions within their respective Component.

<sup>33</sup> For detailed information on the processes and information collections and uses required to execute the pre-suitability checks, *see supra* note 28. For a more extensive discussion of the drug test pre-suitability check specifically, *see* U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE DRUG FREE WORKPLACE PROGRAM, DHS/ALL/PIA-063 (2018), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.



If the results of this preliminary screening are adjudicated in favor of the candidate for all three checks, the process moves into the background investigation phase. If any of the suitability checks are negatively adjudicated, the HR specialist informs the candidate that the TJO is being rescinded and stops all onboarding processes. The hiring manager may then offer a TJO to another candidate on a reissued cert (provided 240 days have not elapsed), restart the hiring process altogether by reposting the position on USAJOBS, or terminate the search for a new candidate entirely.

### Background Investigation

Some candidates will be required to undergo a background investigation. The background investigation phase, if needed, will always occur immediately after the pre-employment suitability check phase for law enforcement positions and positions that require a Top Secret/Sensitive Compartmented Information (TS/SCI) clearance. For positions that are not law enforcement or that require a lower level clearance than TS/SCI, the hiring manager has the option to offer a provisional job offer to the candidate while the investigation is still underway, with the understanding that the candidate's employment will be terminated if the results of the investigation are ultimately adjudicated negatively.

Background investigations are initiated and adjudicated by PerSec and are conducted by OPM.<sup>34</sup> Once the background investigation adjudication is made, PerSec stores the determination in ISMS along with all the information upon which the decision was based. A select few HR specialists in each human capital office can then retrieve the pass/fail determination in a daily production report generated by ISMS. These HR specialists will notify the HR specialists managing the relevant positions, and they in turn inform the hiring manager of the determination and update the USA Staffing or CASS onboarding portal to reflect the determination.<sup>35</sup>

If the candidate does not pass the background investigation and is still in the hiring process, the HR specialist informs the candidate that the TJO is being rescinded and stops all onboarding processes. If the candidate has already been provisionally hired subject to the results of the investigation, the employment will be terminated, and the candidate will be separated from all DHS systems and facilities. Either way, as with the three pre-employment suitability checks, the hiring manager has the option to offer a TJO to another candidate listed on the certs previously provided by the HR specialist (if 240 days have not yet passed since the certs were issued).

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<sup>34</sup> For detailed information about processes and privacy issues related to background investigations at DHS, *see supra* note 28.

<sup>35</sup> The only information PerSec provides to the HR specialists is whether the candidate passed or failed the investigation, and this is the only information entered into USA Staffing and CASS. USA Staffing and CASS also update the candidate's record in EIE with this information via an automated data feed.



If the candidate passes the background investigation, the HR specialist provides notification of eligibility for full performance in the position. Assuming the candidate is still in the hiring process, the HR specialist will work with the candidate (and with the losing agency in the event the candidate is already a federal employee and is moving into a position of the same pay grade) to select an “Entry on Duty” (EOD) date. Once the EOD date is determined, the HR specialist will update the USA Staffing or CASS onboarding portal to reflect the date and will send a final job offer (FJO) to the candidate specifying the terms of employment and providing instructions on how to begin the onboarding process. If the candidate was already provisionally hired subject to the results of the background investigation, the HR specialist simply notifies the employee and the hiring manager of the successful adjudication and the employee becomes eligible to access any DHS systems or locations that were awaiting the results of the investigation.

### FJO Case Records Creation

Candidates who accept final job offers begin the onboarding process by accessing a link in USA Staffing or CASS that provides all the forms needed to complete the process. Forms relevant to all DHS new hires include:

- SF-61, Appointment Affidavits – collects signed affidavit affirming oath of office, commitment not to strike against the federal government, and assurance that no payment or other consideration was received in return for appointment;
- I-9, Employment Eligibility Verification – verifies the identify and employment authorization of individuals hired for employment anywhere in the United States;
- SF-144, Statement of Prior Federal Service – ensures all prior federal service is documented to ensure proper credit for leave benefits, retirement, and retention status in case of a reduction-in-force (RIF);
- SF-181, Ethnicity and Race Identification – captures ethnicity and race data to assist in managing DHS’s Equal Employment Opportunity (EEO) and affirmative employment responsibilities (voluntary);
- SF-256, Identification of Disability – captures types of disabilities to support Executive Branch programs designed to facilitate the hiring, placement, and advancement of individuals with disabilities (voluntary);
- SF-1199A, Direct Deposit Sign Up Form – collects information about the financial institution the appointee would like his or her salary deposited;
- State Withholding Exemption Form – specifies the number of state tax exemptions claimed by the appointee (form varies by state of residence);
- Form W-4 – specifies the number of Federal employee tax exemptions claimed by the appointee;



- AD-349, U.S. Department of Agriculture (USDA) Employee Address – collects appointee’s current or new residence mailing address for purposes of mailing out employee Pay and Thrift Savings Plan (TSP) statements;
- DHS Veterans Service Status – collects veterans’ status, if any, pertaining to era and type of service for application to benefits and retirement; and
- DHS Non-Disclosure Agreement – collects new hire’s signed affirmation not to disclose Protected Critical Infrastructure Information (PCII), Sensitive Security Information (SSI), and other Sensitive But Unclassified (SBU) information.

The candidates are asked to complete the forms and submit them back to the HR specialist who handled the hiring action via USA Staffing or CASS.<sup>36</sup> Once the HR specialist receives the forms, he or she routes them to the appropriate administrative personnel for processing. DHS Components that use CASS can rely on the system to route them to the appropriate personnel. Since USA Staffing does not have the capability to easily route documents, Components who use that onboarding system typically rely on a workflow management and case tracking system called FedHR Navigator.

### *FedHR Navigator*

FedHR Navigator is a vendor-managed system used by many federal agencies that automates HR functions and supports the strategic management of human capital. The tools contained within FedHR Navigator support simultaneous database access by employees and HR personnel. The main tool within the application is the Federal Retirement Benefits (FRB) Web, which is a calculator that generates benefits information. Another feature is the Forms Manager, which allows employees and HR personnel access to over 150 electronic federal forms for use in onboarding; employee separation and transfer; processing deposit and redeposit payments; and completing federal thrift savings plan (TSP), Federal Employment Health Benefits (FEHB), and Federal Employee’s Group Life Insurance (FEGLI) elections. The system also assists with retirement planning, HR case tracking, personnel data management, and reporting.

In the context of onboarding, HR specialists primarily use FedHR Navigator to route HR forms and documents to the appropriate personnel for processing, track where candidates are in the onboarding process, and communicate general information to other HR specialists regarding onboarding status. The system also can be programmed to generate metrics that assist management with understanding who is responsible for which onboarding actions, trends in hiring levels, and other information designed to facilitate managerial decision making.

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<sup>36</sup> If the new hire fails to complete some or all the forms, they will be asked to do so in person at new employee orientation.



## New Hire Provisioning

As the first set of onboarding forms are being processed, efforts begin to provide the new hire with access to facilities, systems, applications, and equipment needed to effectively perform in the job. This process begins with an automatic data feed from USA Staffing or CASS to EIE updating the new hire's record to reflect the projected EOD date. EIE then feeds the following information into the DHS Office of the Chief Information Officer's (OCIO) Trusted Identity Exchange (TIE):<sup>37</sup>

- Person Handle;
- Name (First, Middle, Last);
- Office Location (City, State, Country);
- Organization Code;
- Position Title;
- EOD Date;
- Employee Type (Employee/Contractor);
- Contract Number (if applicable);
- Clearance Level (to help identify which systems the new hire will need to access);
- Supervisor Name (First, Middle, Last); and
- Supervisor Person Handle.

TIE in turn feeds this data into the DHS Access Lifecycle Management System (ALM)<sup>38</sup> for relevant network access and any required software. ALM also sends automated notification requests to Component IT offices for a mobile phone, IP address, desk phone, email address, and mailbox. Simultaneously, the hiring manager takes the steps needed to identify the new hire's workspace and provision it with necessary equipment.

## Entry on Duty

New hires attend a new employee orientation during their first two days as a DHS employee. The orientation begins with the new hires taking their federal oath of office. New hires

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<sup>37</sup> TIE is a secure DHS exchange service that serves as an intermediary between authoritative data sources (i.e. applications or systems that maintain information about DHS employees and contractors) and consuming applications (i.e., applications or systems that request information from the TIE about specific DHS employees or contractors). See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE DHS TRUSTED IDENTITY EXCHANGE, DHS/ALL/PIA-050 (2017), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.

<sup>38</sup> ALM is a DHS system and program that receives core identity information about new employees from TIE and uses digital policies to automatically provide the new employee's account access and authorization information to the network, email, facility control, training, and time and attendance systems. See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE ACCESS LIFECYCLE MANAGEMENT, DHS/ALL/PIA-058 (2017), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.



spend the remainder of the orientation being briefed on general matters of importance to DHS employees such as the Department's history, mission and goals; payroll, retirement, and benefits processes; physical and IT security; privacy and records management; ethics and integrity awareness; and employee appeal rights. Attendees are also required to complete several onboarding benefits forms that require in-person rather than digital signatures. These include:

- Appointment Affidavit committing to uphold the oath of office;
- SF-1152, Designation of Beneficiary for Unpaid Compensation of Deceased Employee;
- SF-2809, Health Benefits Election;
- SF-2817, Life Insurance Election;
- SF-2823, Designation of Life Insurance Beneficiary;
- SF-3102, Designation of Federal Pension Beneficiary;
- TSP-1, Thrift Savings Plan Election Form; and
- TSP-3, Designation of Thrift Savings Plan Beneficiary.

### Processing and Storing Onboarding Documents

The benefits forms that were signed at new employee orientation, as well as the tax-related forms submitted via USA Staffing or CASS upon receipt of the FJO, are routed to the appropriate HR specialists for processing. To process the forms, a profile for each new hire is first created in EmpowHR, which is a National Finance Center (NFC)<sup>39</sup> shared service that supports payroll and personnel processing. Once the profile is complete, any onboarding documents that OPM considers official personnel records are uploaded into the candidate's Electronic Official Personnel Folder (eOPF) file.<sup>40</sup>

#### *EmpowHR*

HR specialists working in the payroll and benefits fields enter information from the onboarding forms such as job code, pay grade, geographic location, tax withholdings, benefits elections, awards, and other finance-related information into EmpowHR so the system can calculate employee salary or wage. EmpowHR then feeds this information into NFC databases for payroll processing. This data feed, when combined with information fed into the database from

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<sup>39</sup> NFC is a federal agency under the USDA Office of the Chief Financial officer. It provides HR, financial, and administrative services for agencies across the federal government. For more information about NFC and its services, see <https://www.nfc.usda.gov/>.

<sup>40</sup> eOPF is a shared service managed by OPM. OPM serves as the chief HR agency and personnel policy manager for the federal government. See U.S. OFFICE OF PERSONNEL MANAGEMENT, PRIVACY IMPACT ASSESSMENT FOR THE EOPF SYSTEM (2017), available at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/eopf-pia.pdf>.





another NFC shared service, Web Time and Attendance (WebTA),<sup>41</sup> is used by NFC to calculate employee paychecks.

## *eOPF*

eOPF provides a digitized recreation of federal civilian employees' official personnel records. eOPF files are created when an employee begins federal service and are maintained throughout the employee's career in accordance with OPM regulations. Employees can access their personnel records in eOPF at any time by signing into the system with a username and password. Documents that are scanned into eOPF as part of the onboarding process include all the beneficiary forms signed during new employee orientation, as well as the I-9, OF-306, and SF-144 that were digitally signed and sent to the HR specialist via USA Staffing or CASS upon acceptance of the FJO. An SF-50 appointment letter is also scanned into the system and uploaded into USA Staffing or CASS to close the talent acquisition case.

## Commencement of Job Duties

After the two-day new employee orientation ends, new hires begin performing their job duties in the new space provisioned for them by the hiring manager. From this point on, any HR-related issues or concerns, including those onboarding functions such as setting up payroll or establishing benefits, can be addressed using the FHR Navigator system or by contacting their Component or Office's local HR representatives. Employees will also have access to their official HR records in eOPF throughout the length of their employment.

## **Section 1.0 Authorities and Other Requirements**

### **1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

Under 5 U.S.C. § 1104, OPM has delegated to agencies the authority to conduct competitive examinations for positions in the competitive service, except for administrative law judge positions. DHS hiring authorities receive their delegation authority from OPM and have two fundamental responsibilities: to ensure that the agency's vacant positions are filled with the best-qualified persons from a sufficient pool of well-qualified eligible candidates and to uphold the laws, regulations, and policies of merit selection as defined in 5 U.S.C. §§ 2301 and 2302.

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<sup>41</sup> WebTA is used by federal employees to document hours worked and leave taken. This information is fed into an NFC database once per pay period for calculation of the employee's periodic pay. *See* U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE DHS WEB TIME AND ATTENDANCE (WEBTA) SYSTEM, DHS/ALL/PIA-009 (2008), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.



## **1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

Information collected, maintained, used, and disseminated by DHS when conducting its Talent Acquisition business function is covered by several government-wide SORNs developed and managed by OPM and Department-wide SORNs managed by DHS:

- OPM/GOVT-1 General Personnel Records, 77 Fed. Reg. 73694 (December 11, 2012), as modified by 80 Fed. Reg. 74815 (November 30, 2015);
- OPM/GOVT-5 Recruitment, Examining, Placement Records, 71 Fed. Reg. 35351 (June 19, 2006), as modified by 80 Fed. Reg. 74815 (November 30, 2015);
- OPM/GOVT-6 Personnel Research and Test Validation Records, 71 Fed. Reg. 35354 (June 19, 2006), as modified by 80 Fed. Reg. 74815 (November 30, 2015);
- OPM/GOVT-7 Applicant Race, Sex, National Origin and Disability Status Records, 71 Fed. Reg. 35356 (June 19, 2006), as modified by 80 Fed. Reg. 74815 (November 30, 2015);
- DHS/ALL-002 DHS Mailing and Other Lists System, 73 Fed. Reg. 71659 (November 25, 2008);
- DHS/ALL-022 Department of Homeland Security Drug Free Workplace, 73 Fed. Reg. 64974 (October 31, 2008); and
- DHS/ALL-023 Personnel Security Management, 75 Fed. Reg. 8088 (February 23, 2010).

## **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

Yes. SMORE resides on DHS's Customer Relationship as a Service (CRMaaS) platform and is covered by the CRMaaS system security plan. The system was last accredited August 23, 2017 and is continuously monitored as part of DHS's Ongoing Authorization program. A system security plan was completed for CASS on January 31, 2019. DHS is currently working to accredit the system based on the security findings identified in the plan. EIE is a minor application of the OCHCO Virtual Production Enclave (VPE) and is covered by the OCHCO VPE system security plan. The system was last accredited April 20, 2017 and is continuously monitored as part of DHS's Ongoing Authorization program. FedHR Navigator has its own system security plan and was last accredited October 12, 2016. It is continuously monitored as part of DHS's Ongoing Authorization program.



All Component systems listed in the Appendix also fall under these same accreditation requirements.

USAJOBS, USA Staffing, and USA Hire are all external information systems managed by OPM and thus OPM is responsible for their system security plans. EmpowHR and WebTA are both external information systems managed by NFC and thus NFC is responsible for their system security plans.

#### **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

Yes. The NARA General Records Schedule (GRS) 2.1, Employee Acquisition Records covers all categories of information that directly support Talent Acquisition at DHS.<sup>42</sup> GRS 2.2, Employee Management Records, items 040, 041, 050, and 060 also cover certain records created during the hiring process that are retained throughout an individual's period of employment.<sup>43</sup>

#### **1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

At the applicant's discretion, the following standard federal forms may be submitted by the applicant into USAJOBS during the initial application process:

- Verification of Indian Preference for Employment, BIA-4432
- Discharge Papers and Separation of Documents, DD-214
- Declaration for Federal Employment, OF-306
- Application for 10-point Veteran Preference, SF-15
- Notification of Personnel Action, SF-50

The following standard federal forms are collected from candidates who receive TJOs:

- Declaration for Federal Employment, OF-306
- Pre-screen for Clearance Form, DHS-110005
- DHS Credit Release Form, DHS-110009

The following standard federal forms are collected from candidates who receive FJOs:

- Appointment Affidavits, SF-61

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<sup>42</sup> NATIONAL ARCHIVES AND RECORDS ADMINISTRATION, GENERAL RECORDS SCHEDULE 2.1: EMPLOYEE ACQUISITION RECORDS, available at <https://www.archives.gov/records-mgmt/grs.html>.

<sup>43</sup> NATIONAL ARCHIVES AND RECORDS ADMINISTRATION, GENERAL RECORDS SCHEDULE 2.2: EMPLOYEE MANAGEMENT RECORDS, available at <https://www.archives.gov/records-mgmt/grs.html>.



- Employment Eligibility Verification, I-9
- Statement of Prior Federal Service, SF-144
- Ethnicity and Race Identification, SF-181 (voluntary)
- Identification of Disability, SF-256 (voluntary)
- Direct Deposit Sign Up Form, SF-1199A
- Employee Withholding Certificate, Form W-4
- USDA Employee Address, AD-349

The following forms are collected from new employees at the new employee training event:

- Designation of Beneficiary for Unpaid Compensation of Deceased Employee, SF-1152
- Health Benefits Election, SF-2809
- Life Insurance Election, SF-2817
- Designation of Life Insurance Beneficiary, SF-2823
- Designation of Federal Pension Beneficiary, SF-3102
- Thrift Savings Plan Election Form, TSP-1
- Designation of Thrift Savings Plan Beneficiary, TSP-3

## Section 2.0 Characterization of the Information

### 2.1 Identify the information the project collects, uses, disseminates, or maintains.

SMORE currently collects the following PII on recruiters and vendor POCs who assist at DHS-sponsored recruitment events:

- Name
- Salary (masked in the system to analysts)
- Grade, step, and year these were obtained (masked)
- Hourly rate, if applicable (masked)
- Total salary cost (masked)
- Role
- Number of hours spent at event
- Vendor POC (name, business phone, business email)

SMORE also collects PII from individuals who register for recruitment webinars. This PII is collected via an electronic registration survey and most of it is automatically aggregated to produce real-time analytics dashboards. PII is not linkable back to the registrant since SRDI intentionally avoids linking individuals to survey answers.



- U.S. Citizenship (Y/N)
- Employee Type (DHS Employee/Contractor/Non-DHS Employee/Student)
- Student Status (Y/N)
- If Student:
  - Name of Academic Institution (not aggregable)
  - Type of Student (Community College/Undergraduate/Graduate/Recent Graduate)
  - Class (Freshman/Sophomore/Junior/Senior)
  - Major (not aggregable)
  - Interest (Internship, Post-Graduate)
  - Expected Graduation Date
- Veteran Status (Y/N)
- If Veteran:
  - Military Branch (Army, Air Force, Coast Guard, Marine Corps, Navy, National Guard, Reserves)
  - Military Status (Active Duty, Retired, Served but Did Not Retire)
  - Veterans Preference (5-point;10-point with 10-30% disability; 10-point with 30+% disability; 10-point for non-compensable disability; 10-point based on wife, widow, or widower; not sure or unknown)
  - Schedule A Disability (Y/N)
  - Professor/Faculty (Y/N)
- Prior Federal Employment (Y/N)
- Special Hiring Authorities (Schedule A, Veterans Recruitment Appointment, 30% or More Disabled Veteran, Disabled Veteran who has completed a VA Training Program, Derived Preference, Not Applicable)
- Career Interest
- How Registrant Learned About Webinar
- How Knowledgeable Registrant is About DHS Careers
- How Likely Registrant is to Apply for a Job at DHS
- Whether Registrant has Profile in USAJOBS (Y/N)

The SMORE webinar recruitment survey also collects the following optional information:

- Whether registrant opts to respond to demographic portion of survey (Y/N)
- Gender (M/F)
- Ethnicity (Hispanic or Latino/Non-Hispanic or Non-Latino)
- Race (American Indian or Alaska Native, Black or African American, Native Hawaiian or other Pacific Islander, White)



The following information is collected from applicants when they create profiles in USAJOBS:

- Name
- Address
- Email
- Phone
- Citizenship Status (Y/N)
- Selective Service Registration Status (Y/N/NA)
- Highest Education Obtained
- Eligible Hiring Paths (U.S. Citizens, Federal Employees, Peace Corps & AmeriCorps, Veterans, Military Spouses, National Guard & Reserves, Students, Recent Graduates, Senior Executives, Individuals with Disabilities, Family of Overseas Employees, Native Americans, Land and Base Management)
- Federal Employment Status (current, former with reinstatement eligibility, former without reinstatement eligibility, not a federal employee)

Other PII related to current employment status; knowledge, skills, and abilities; and hiring path status may be entered at the discretion of the user creating the USAJOBS profile depending on answers to the above questions.

The following PII is collected via the various forms that applicants and others involved in the Talent Acquisition process are either required to submit, or that the applicant chooses to submit at his or her discretion:

### Candidate/Employee Information

- Name
- Address
- Phone (Duty/Work, Night/Home, Cell)
- Email (Personal, Office)
- SSN
- Place of Birth
- Date of Birth (DOB)
- Citizenship (U.S., Dual, Noncitizen U.S. National, Lawful Permanent Resident, Alien Authorized to Work, Country, Permanent Resident Number)
- Marital Status
- Gender
- Disability Code
- Hispanic or Latino (Y/N)



- Race (American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White)
- Spouse Name
- Spouse SSN
- Father's Name
- Mother's Name/Maiden Name
- Employee ID (if applicable)
- Current Federal Organization Assigned (if applicable)
- Identity Document (Title, Issuing Authority, Document Number, Expiration Date)
- Selective Service Registration (Y/N, if no provide reason)
- Signatures (Applicant or Appointee Signature, Date)

## Financial Disclosure Information

- Personal Assets, U.S. and Foreign (e.g., Annual Income, Bank Accounts, Investment Accounts, Real Estate, Leased Vehicles, Other Assets, Safe Deposit Box)
- Personal Liabilities, U.S. and Foreign (e.g., Mortgages, Liens, and Other Liabilities; Credit Cards, Bankruptcy)

## Education Information

- Education Type (Level, Year Obtained, Major, School Information)
- License/Certification/Registration Information (State, Type, Number, Date Issued, Date Expires, Any Revocations)

## Military/Career Information

- Veteran Information (Veteran Status, Veteran's Preference Information, Veteran Name, Rank, Active Duty Entry Date, Retire or Fleet Transfer Date, Type of Discharge, Veterans Deceased Status, Creditable Military Service, Service Administrative Files, Service Medical Records)
- Previous Employment (Position Title, Grade, Name of Employer, Type of Service, Agency Code, Duty Station, Business Address, Agency Data, Length of Employment)
- Personnel File Information (Location, Date Sent)
- History of Employment Absence Without Pay (Lost Time, Total Number of Days)
- Type of Appointment (Full-Time, Part-Time, Intermittent)
- Pay Information (Pay Plan, Occupational Code, Grade or Level, Step or Grade, Date Entered Current Grade, Date of Last Within Grade Increase, Date of Grade Increase Denial, Date of Last Quality Step Increase, Total Salary, Pay Basis, Basic Pay, Earning, Locality Adjustment, Adjusted Basic Pay, Other Pay, Retention Allowance,



Supervisory Differential, Availability Pay, Special Pay Authority, Pay Retention Information, Highest Salary Information)

- Service Obligation (Due to Training Received, Due to Recruitment or Relocation Bonus, Expiration Date)
- Employee Payroll Data (Payroll Office Information, Year to Date Pay Information, Begin Date, Not to Exceed Date)
- W-4 Information (Marital Status, Total Number of Allowances, Additional Amount, Total Amount)
- Personnel Actions (Action Code, Nature of Action, Authority Code, Legal Authority, Receipt Date, Effective Date)
- Agency Official Signature and Title
- Tenure, Reduction in Force, and FEGLI Information
- Service Computation Date
- Work Schedule
- Part-Time Hours
- Fair Labor Standards Act (FLSA) Category (Exempt/Non-Exempt)
- Appropriation Code
- Bargaining Unit Status
- Civilian Retirement Date
- Retirement System Paying Annuity
- Frozen Service (Years, Months)
- Federal Employees' Retirement System (FERS) Coverage (Elected FERS, Covered Automatically, Never Covered)
- Personnel Office Code
- Ratings of Records (Level, Pattern, Period)

## Position and Employment Information

- Employer Information (Agency or Organization Name, Organization Code, Employer Identification Number, Address)
- Job Information (Position Title, Position Number)
- Employee Status (Civilian, Retired, Compensation, Employee, Former Employee)
- Provisional Clearance Status (Elected, Not Elected)
- Position Type (Federal, Contractor, Detailee, Other)
- Medical Provider Type
- Detail Type (Federal, State, Local Detailee, Other)
- Residency Requirement (Yes/No, Institution Name/Address/Phone)





- Foreign Residency/Employment/Education in Last Three years (Country, Explanation, Begin Date, End Date)
- Detail Information (POC Name, Sponsor Name, Duty Location)
- Position Category (Permanent, Downgrade/Upgrade, Temporary, Cancel)
- Pay Plan and Organizational Code
- Grade or Level
- Series
- Agency Personnel Office that Services the Position
- EOD Date/First Day
- Losing Agency Release Data (Acceptable EOD Date, Earliest Possible Release Date, Release Date POC, Individual Releasing Data, Releasing Agency Contact Information, Signature and Date)
- Date of Rehire
- Temporary Position Period of Performance
- Office of Internal Affairs Applicant (Y/N)
- Internal Affairs Personnel Security Division Applicant (Y/N)
- Security Clearance Required (Y/N)
- Position Description (Critical Sensitive/Non-critical Sensitive/Non-Sensitive/High-Risk Public Trust/Moderate Risk Public Trust)
- Position Sensitivity (Critical Sensitive/High-Risk)
- Clearance Level (TS/SCI/TS/Secret/None)
- Pre-Appointment Waiver Request (Y/N, Date of Request)
- Training (Training Plan Required, Description, Completion Date)
- Contractor Position History (Y/N, Previous Employment End Date)
- Employment Category (Federal New Hire, Detailee, Consultant, Former Federal Employee, Date Left Federal Service, Agency Transferred From)
- Position Location/Address
- Supervisor/Point of Contact (Name, Office/Component, Office Phone Number, Office Email)
- Appointment Data (Nature of Action, Appointment Type, Authority for Appointment, Date)
- Date of Most Recent Career Conditional Appointment
- Probation Data (Position Type, Begin Date, End Date)
- Unfavorable Data (Y/N in Official File, Y/N in Other Files, POC Name, POC Phone)
- Code of Conduct – Acknowledged Having Read (Y/N)
- FEHB Data (Waived, Cancelled, Ineligible, Enrolled, Date of Enrollment)



## Investigation/Clearance Information

- Current Agency
- Investigative Service Provider
- Status of Background Investigation (Completed/Pending, Date Completed/Initiated)
- Investigation Type
- Purpose of Investigation (New Hire, Rebadge, Reinvestigation, Other)
- Clearance Type (Interim/Final)
- Clearance Level
- Date Clearance Granted (Date Full Clearance Granted, Temporary Clearance Start Date, Temporary Clearance End Date, Reissued Date, Date Clearance Ended)
- ID Badge Information (Badge Type, Badge Number, Issue Date, Expiration Date, Status)
- All Family Members U.S. Citizens (Y/N)
- Applicant Held SCI Access Before (Y/N)
- Department/Agency Clearance was Held
- Access Questions (Why Does Individual Needs Access? Requirement That Can Be Filled by Office of Intelligence Personnel? How/Where will SCI Information Be Accessed? Who is Provider of Information? What is Present Level of Clearance and Who Granted It?)
- Other Remarks
- Special Security Officer (Full Name, Signature, Date, Phone)
- Personnel Security Clearance Determination (Initiation Required, Reciprocity Eligible, Reactivate, Reciprocity Revoked)
- Has Individual held SCI Access Within Last Two Years (Y/N)
- Was SCI Access Granted with a Waiver (Y/N)

## Benefits Information

- FEHB Waiver Information (Waive Participation in Premium Conversion, Pre-Tax Deduction Reason)
- Dependent Information (Full Name, SSN, DOB, Gender, Relationship Code, Address, Email, Phone)
- Health Insurance Enrollment (Medicare Information, Current Plan, New Plan, Event Code, Date of Life Event, Enrollment Status)
- 4-Digit Insurance Code
- SF-50 Equivalent 2-Digit Code
- FEHB Option (Option A – Standard, Option B – Additional, Option C – Family)



- Direct Deposit Information (Full Name of Person Entitled to Payment, Account Information, Payment Type, Payment Allotment, Payee Signature and Date, Joint Account Holder Signature and Date, Name of Individual Submitting Form, Agency Name, Agency Address, Financial Institution Information)
- Thrift Savings Plan Information (Account Number, Account Type, Service Computation Date, Vesting Code, Status Code, Status Date, TSP Loan Information, TSP Allocation, Percentage of Basic Pay, Whole Dollar Amount, G Fund Percentage, F Fund Percentage, C Fund Percentage, TSP Certifier Name/Signature/Date, TSP Election Information)
- Designation of Beneficiary Information (Relationship, Full Name, Address, SSN/EIN/Tax ID, DOB, Trustee/Executor Name, Percentage Share, Claim Number)

Other Interested Parties (information that may be collected via forms about third parties that have an interest or involvement in a specific hiring action)

- Witnesses to Signatures (Full Name, Title, Office, Address, Signature, Date, Commission Expiration Date)
- Emergency Contact (Full Name, Relationship to Employee, Phone)
- Foreign Relative or Associate (Full Name, Address, Type of Relation, Gender, Citizenship Code Number, Place of Birth, DOB, SSN, Employer Information, Degree and Method of Contact, Date of Last Contact, U.S. Naturalization Information, Date of Entry into U.S., Alien Registration Number, Additional Information)
- Requestor Information (Full Name, Address, Title, Military Status, Signature and Date)
- Preparer/Translator Information (Full Name, Address, Phone, Title, Signature and Date)
- Job Counselor Information (Full Name, Address, Phone, Email)
- Approver Information (Decision, Decision Date, Full Name, Title, Signature and Date)
- Document Verifier Information (Full Name, Title, Organization, Address, Signature and Date)

### Background and Suitability Information

- Conviction, imprisonment, probation, or paroled in last 7 years (Y/N)
- Convicted by a military court in last 7 years (Y/N)
- Currently under charges for any violation of law (Y/N)
- Fired from job, or quit for performance-based reasons, or debarred from federal employment in last 7 years (Y/N)
- Delinquent on any federal debt (Y/N)
- Any relatives that work for agency to which form is being submitted (Y/N)



- Receive, or ever applied for, retirement pay, pension, or other retired pay (Y/N)
- Date Left Last Federal Job (Month, Day, Year)
- Waive Basic Life Insurance When Last Worked for Federal Government (Y/N)
- Familiar with Protected Critical Infrastructure Information (initial in box)
- Familiar with Sensitive Security Information (initial in box)
- Familiar with Other Sensitive but Unclassified Information (initial in box)
- Does resume submitted with application list all Federal Government Civilian and uniformed service (Y/N)
- Citizenship Status of Relatives and Associates (various questions related to whether applicant or spouse has relatives or associates that live or work, or that were born, outside of the United States)
- Drug History/Testing (various questions related to purchase, use, sale, cultivation, and distribution of drugs)

## **2.2 What are the sources of the information and how is the information collected for the project?**

SMORE collects information from attendees at recruitment events and from registrants at recruitment webinars. Information is also collected from job applicants, either directly or via uploaded resumes and forms, when they apply for positions in USAJOBS. Additionally, information is collected from job candidates via forms they submit into the online portals of USA Staffing and CASS once they receive TJOs and FJOs. Furthermore, information is collected from new hires via forms they complete at their new employee orientation. Finally, information about applicants is collected from certain third parties involved in the Talent Acquisition process such as HR specialists, PerSec personnel, and background investigators.



### **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

No. All information collected by OCHCO and Component HR offices is collected from the data subjects themselves.<sup>44</sup>

### **2.4 Discuss how accuracy of the data is ensured.**

HR specialists and others involved in the Talent Acquisition process rely on the data subjects themselves to provide information. If inaccuracies in the information they provide result in an inability to process onboarding functions such as setting up payroll or establishing benefits, the HR specialist handling the function will reach back to the data subject with a request to correct.

### **2.5 Privacy Impact Analysis: Related to Characterization of the Information.**

**Privacy Risk:** There is a risk that HR specialists and others involved in the Talent Acquisition function may be able to access information about individuals they do not need in the performance of their duties.

**Mitigation:** This risk is mitigated. A feature in both USA Staffing and CASS allows HR specialists to permit or deny hiring managers and others involved in the Talent Acquisition process the ability to view specific supporting documents. HR specialists are trained to hide from view any documents that contain SPII and that are unrelated to the role of the individual with which the information is shared. Forms completed at new employee orientation are immediately routed to the individuals responsible for processing them and all records retention, storage, and disposal procedures are followed.

**Privacy Risk:** There is a risk that HR specialists will collect more information about individuals than is needed to successfully execute the Talent Acquisition function.

**Mitigation:** This risk is mitigated. The Talent Acquisition workflow is designed to only collect information at the point at which it is required. For example, information required to conduct pre-suitability checks and background investigations is only collected from those who receive TJOs since that is the point on the workflow where these processes commence. Similarly, information collected to process benefits is only collected from those who receive FJOs and who

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<sup>44</sup> Although OPM and PerSec do collect publicly available data when conducting background investigations and pre-employment suitability checks, this collection is not considered part of the HCBRM Talent Acquisition function. For more information about this collection, *see supra* note 28.



attend new employee orientation since that information is only necessary from individuals who ultimately become DHS employees.

**Privacy Risk:** There is a risk that DHS will maintain inaccurate information about job applicants and candidates.

**Mitigation:** This risk is partially mitigated. HR specialists and others involved in the Talent Acquisition process rely on the applicants themselves to provide information. If inaccuracies in the information individuals provide result in an inability to process onboarding functions such as setting up payroll or establishing benefits, the HR specialist handling the function will reach back to the individual with a request to correct. Additionally, applicants may update and change their profiles in USAJOBS, USA Staffing, and CASS at any time to ensure data quality and integrity of their application profiles. Furthermore, individuals may file a Privacy Act request with DHS or OPM to access and correct their personnel records, as applicable.

## Section 3.0 Uses of the Information

### 3.1 Describe how and why the project uses the information.

OCHCO and Component HR offices coordinate the Talent Acquisition function for all job applicants and prospective and newly-appointed employees. These hiring authorities use this information to fill vacancy announcements, produce certificates of eligible, extend TJOs and FJOs, collect information necessary for PerSec to conduct pre-employment suitability checks and background investigations, and process new-hires into the Department. Most of the information collected is PII and SPII. SSNs are necessary to verify employment eligibility and to allow applicants to receive pay, to pay taxes, and to obtain benefits. New hire information is used by HR specialists working in benefits processing to enroll new employees in government benefit and direct deposit programs during their first pay period as a DHS employee.

### 3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No. DHS's Talent Acquisition function does not rely on technology to conduct electronic searches, queries, or analyses in electronic databases to discover or locate predictive patterns or anomalies.



### 3.3 Are there other components with assigned roles and responsibilities within the system?

DHS's Talent Acquisition function is performed in conjunction with OPM and NFC; and is supported by various online, browser-based tools that those agencies provide DHS to determine eligibility of applicants for federal employment and to process payroll and benefits. DHS HR Offices are separated by Component, with each having its own instances of these OPM and NFC systems. CASS, which is a vendor-managed system, is also comprised of Component-specific instances. Although HR specialists across Components can access CASS, OPM's USA Staffing and eOPF systems, or NFC's EmpowHR and WebTA systems, they can only access the data of applicants, candidates, and employees of their Components.

OCHCO and Component HR offices also rely on their own Component PerSec Offices to conduct pre-employment suitability checks and background investigations. Again, information is only shared between the HR Offices and the PerSec Offices of the Components to which the applicants are applying.

### 3.4 Privacy Impact Analysis: Related to the Uses of Information

**Privacy Risk:** There is a risk that applicant and new employee information may be used in a manner inconsistent with the original purpose for collection.

**Mitigation:** This risk is mitigated. All files and records are collected and maintained by Component HR offices in accordance with OPM regulations and instructions. These files are only used to meet OPM personnel requirements, including screening qualifications of employees; determining status, eligibility, and employee's rights and benefits under pertinent laws and regulations governing federal employment; computing length of service; and other information needed to provide hiring and personnel services to job applicants and new employees. All HR personnel also complete annual privacy training that discusses proper use and disclosure of PII. HR specialists who use applicant and new employee data in a manner inconsistent with these OPM regulations are subject to discipline, up to and including removal.

**Privacy Risk:** There is a risk of individuals gaining unauthorized access to information in systems that support DHS's Talent Acquisition function.

**Mitigation:** This risk is mitigated. Information security and policy controls for all HR systems must comply with DHS 4300A, *Sensitive System Handbook*.<sup>45</sup> Specific controls include

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<sup>45</sup> DHS 4300 is a series of information security policies, which are the official documents that create and publish Departmental security standards in accordance with DHS Management Directive 140-01, *Information Technology System Security*. See U.S. DEPARTMENT OF HOMELAND SECURITY, DHS 4300A SENSITIVE SYSTEMS HANDBOOK, available at <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook> (last accessed August 9, 2020).



role-based access to systems only on a need to know basis and subject to the approval of the system owner and system administrators. Password resets are also periodically required, and accounts are disabled upon expiration.

**Privacy Risk:** There is a risk that incorrect information in employee records contained in HR systems supporting the Talent Acquisition function could lead to faulty or unjust personnel decisions.

**Mitigation:** This risk is mitigated. Applicants are notified when a negative determination is made regarding their application and the reasons for the determination. Hiring authorities are subject to legal liability if a determination is made contrary to OPM or DHS regulation, and applicants are encouraged to follow up via phone or email with the HR specialist handling their application if they are not satisfied with the negative determination. Additionally, PerSec notifies applicants with a certified letter that includes procedures for redress once their background investigation has concluded.

Regarding information collected from new hires for onboarding functions such as setting up payroll or establishing benefits processing, HR specialists upload an original copy of the relevant employee forms in DHS IT systems and eOPF, as appropriate. Employees are then able to file a ticket within these systems to request that an HR specialist review their profile within NFC's payroll system if they suspect an inaccuracy or a faulty decision. Hiring authorities are subject to legal liability if they make a payroll or benefits determination contrary to federal law or regulation.

## Section 4.0 Notice

### **4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

Notice is provided at the time of collection via Privacy Act Statements, which are available during recruitment events, on the USAJOBS website, and on forms submitted into the USA Staffing and CASS online portals where required. Privacy Act Statements also appear on all forms completed by the applicant for background investigations and security clearance checks. The Privacy Act Statements inform individuals of the authority for and purpose of the collection, the uses of the information, and whether providing the information is mandatory. Notice is also provided by this PIA, as well as the publication of the SORNs identified in Section 1.2.





## **4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?**

Applicants have the flexibility to decline to provide any their information for any job announcement by choosing not to participate in the hiring process for that employment opportunity. For those that do decide to submit their information for a job announcement, they nonetheless may opt to decline providing certain demographic information about themselves as part of the initial application questionnaire. New hires may also decline to provide their information by opting to participate only in the benefit programs of their choosing.

However, as a requirement for employment, DHS must collect most of the information listed above.

## **4.3 Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that applicants and new hires will not receive adequate notice detailing the purpose for the collection of their information, as well as its use, maintenance, and dissemination.

**Mitigation:** This risk is mitigated. Privacy Act Statements are provided to applicants and new hires at the time they submit their information during recruiting events, through USAJOBS, or on online HR portals, and whenever they submit forms for onboarding processing or to facilitate pre-employment suitability checks and background investigations. This risk is also mitigated by publication of this PIA and the SORNs identified in Section 1.2.

## **Section 5.0 Data Retention by the project**

### **5.1 Explain how long and for what reason the information is retained.**

Records related to OPM's HCBRM Talent Acquisition function are generally covered by NARA GRS 2.1, Employee Acquisition Records, and certain records created during the onboarding process are covered under NARA GRS 2.2, Employee Management Records.

GRS 2.1 explicitly states its purpose, which is to cover records agencies create in the process of hiring employees for federal civilian service, whether career service, senior executive service, political appointment, excepted service appointment, or temporary/special appointment. The schedule also states that it reflects OPM's determinations on appropriate records retention periods for the sake of agencies for which OPM exercises oversight authority (of which DHS is one). The specific retention periods for the categories of information covered under this schedule are as follows:



Item	Records Description	Disposition Instruction
010	<b>Classification Standards</b> – Correspondence and other records relating to developing classification standards specific to a single agency or all agencies, including notice of Office of Personnel Management (OPM) approval or disapproval.	<b>Temporary.</b> Destroy 2 years after standard is superseded, canceled, or disapproved by OPM (as appropriate) but longer retention is authorized if required for business use.
020	<b>Position Descriptions:</b> Records relating to developing, editing, classifying, and evaluating position descriptions, including information on title, series, grade, duties, and responsibilities	<b>Official record copy of position description.</b> Copy held at Human Resources Office.
021		<b>Copies in employee Official Personnel File (OPF), Unofficial Personnel File (UPF) and supervisor’s personnel file.</b>
022		<b>All other related records.</b> Includes case file at position’s program office; background material in Human Resources case file; other copies of records in item 020.
030	<b>Position reviews and classification appeals.</b> Records an agency creates and receives when reviewing a position’s classification in response to a classification appeal to the agency Human Resources function or directly to OPM, including records of desk audits.	<b>Temporary.</b> Destroy 3 years after final decision, but longer retention is authorized if required for business use.



040	<b>Certificates of classification.</b> Certificates a Federal agency receives from OPM, stating final decision on a position classification appeal.	<b>Temporary.</b> Destroy 2 years after position is abolished or description is superseded, but longer retention is authorized if required for business use.	
050	<b>Job vacancy case files.</b> Case files an agency creates when posting and filling competitive job vacancies. Also known as case examining, competitive examination, or merit case files. Includes: request for lists of eligible candidates; job announcement; examination announcement; job analysis, assessment criteria, and crediting plan; basis for certification; applications, resumes, supplemental forms, other attachments; list of eligible candidates or applicants screened, ranking or ratings assigned, and basis for certification; certificates, registers or lists of eligible candidates issued to selecting officials; job-related test records; mandatory applicant drug test records; annotated certificates of eligible candidates returned by selecting officials; job offers; records of job offer being accepted or declined; correspondence/documentation	<b>Records of one-time competitive and Senior Executive Service announcements/selections.</b>	<b>Temporary.</b> Destroy 2 years after selection certificate is closed or a final settlement of any associated litigation; whichever is sooner.
051		<b>Records of standing register competitive files for multiple positions filled over a period of time.</b>	<b>Temporary.</b> Destroy 2 years after termination of register.



	of announcement or recruiting operation.		
060	<b>Job application packages.</b> Application packages for competitive positions; in USAJOBS or its successors, and other systems, whether electronic or analog. Includes: application, resume, supplemental forms, other attachments.		<b>Temporary.</b> Destroy 1 year after date of submission.
070	<b>Case files on lost or exposed job test materials.</b> Files showing the circumstances of loss, nature of the recovery action, and corrective actions when Civil Service or job-specific test questions are erroneously made potentially available to candidates.		<b>Temporary.</b> Destroy 5 years after date of final report.
080	<b>Requests for non-competitive personnel action.</b> Agency copy of requests submitted to OPM for approval for non-competitive personnel action on such matters as promotion, transfer, reinstatement, or change in status.		<b>Temporary.</b> Destroy 1 year after approval is granted or denied.
090	<b>Interview records.</b> Case files related to filling job vacancies, held by hiring official and interview panel members. Includes: copies of records in the job vacancy case file; notes of interviews with selected and non-selected candidates; reference check documentation.		<b>Temporary.</b> Destroy 2 years after case is closed by hire or non-selection, expiration of right to appeal a non-selection, or final settlement of any associated litigation, whichever is later.
100	<b>Political appointment (Schedule C) records.</b> Records regarding evaluation of individuals' suitability for non-career positions by non-competitive appointment under Schedule C. Includes: applications for employment; resumes; individuals' background information; ethics pledges and waivers; security clearances; correspondence;	<b>Records (except ethics pledges and waivers) related to appointees.</b>	<b>Temporary.</b> Destroy after separation. Retention up to end of administration under which individual was hired is authorized if required for business use.
101		<b>Ethics pledges and waivers of appointees.</b>	File in appointee's Official Personnel File.
102		<b>Records related to non-appointees</b>	<b>Temporary.</b> Destroy 1 year after consideration of the candidate ends.



	other documentation relating to the selection, clearance, and appointment of political appointees		Retention up to end of administration under which individual was considered is authorized if required for business use.
110	<b>Excepted service appointment records.</b> Records created in filling permanent or temporary job vacancies by non-competitive appointment under Schedules A, B, or D (as defined in 5 CFR 213.3101, 3201, 3303, and 3401). Includes (as appropriate): application, attachment, and supplemental forms; documentation of eligibility for excepted service appointment; proof of special qualifications; resume or other proof of employment education, or relevant experience; proof of disability issued by a licensed medical professional; certification of job readiness; notice of appointment, terms, and acceptance.	<b>Case files that document appointing individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities as defined in 5 CFR 213.3102(u).</b>	<b>Temporary.</b> Destroy 5 years after candidate enters on duty, is no longer under consideration, or declines offer.
111		<b>Case files related to all other appointees.</b>	<b>Temporary.</b> Destroy 2 years after hiring authority closes but longer retention is authorized if required for business use.
120	<b>Special hiring authority program records.</b> Records an agency creates and receives that document its administration of special hiring authority programs such as summer, student, intern, and other temporary hiring authorized by OPM.		<b>Temporary.</b> Destroy 2 years after hiring authority closes but longer retention is authorized if required for business use.
130	<b>Records related to individual employees hired under special temporary authority.</b> Includes participant agreement, records of mentoring, documentation that		<b>Temporary.</b> Destroy 2 years after employee is converted to a permanent



	employee fulfilled educational and other requirements, and conversion to a permanent position.		position or leaves a program but longer retention is authorized if required for business use.
140	<b>Pre-appointment files.</b> Records created when vetting a prospective employee between the time a job offer is accepted and the time employee enters on duty.	<b>Records documenting background investigation or vetting of prospective employees to determine eligibility for security clearance and sensitive positions.</b> Included are forms in the SF-85 family, fingerprint charts, and related correspondence.	Forward to appropriate security office after prospective employee enters on duty, declines appointment, or is no longer a candidate.
141		<b>Records appropriate for inclusion in OPF.</b> Such as designation of beneficiary, life insurance election, and health benefits registration.	<b>Records concerning prospective employees who enter on duty:</b> Forward to appropriate human resources office to include in OPF after employee enters on duty.
142			<b>Records concerning prospective employees who do not enter on duty: Temporary.</b> Destroy 1 year after employee is no longer a candidate.
143		<b>Copies of records included in Job vacancy case file.</b>	<b>Temporary.</b> Destroy after prospective employee enters on duty, declines appointment, or is no longer a candidate.
150	<b>Records of delegation of authority for examination and certification.</b> Agreements and related records created under		<b>Temporary.</b> Destroy 3 years after agreement



	the authority of 5 U.S.C. § 1104 by which OPM delegates to an agency the authority to examine and certify applicants for employment.		terminates but longer retention is authorized if required for business use.
160	<b>Delegated authority audits.</b> Reports of delegated examining operations audit delivered to the audited agency.		<b>Temporary.</b> Destroy when 3 years old, but longer retention is authorized if required for business use.
170	<b>Adverse impact files.</b> Records documenting the impact of tests and other selection procedures on peoples' employment opportunities, recorded by sex, race, and ethnic group in order to determine compliance with the Uniform Guidelines on Employee Selection Procedures. Includes records documenting: number of applicants by sex, race, and national origin; number of people hired, promoted, and terminated, by sex, race, and national origin; selection procedures and their validity.	<b>Records revealing no adverse impact.</b>	<b>Temporary.</b> Destroy when 3 years old, but longer retention is authorized if required for business use.
171		<b>Records revealing an adverse impact.</b>	<b>Temporary.</b> Destroy 2 years after eliminating the adverse impact, but longer retention is authorized if required for business use.
180	<b>Recruitment records.</b> Records documenting agency in-person and online recruitment efforts at career fairs, job fairs, visits to colleges, and similar venues. Includes: records documenting planning and logistics of individual recruitment events; record copy of advertisement and materials for distribution; contact information and interest areas collected from potential job candidates; recruitment event reports; correspondence with prospective candidates.		<b>Temporary.</b> Destroy when 1 year old, but longer retention is authorized if required for business use.



GRS 2.2 covers records federal agencies create while carrying out the work of employees, including the processing of certain personnel actions created during the onboarding process. The retention periods under this schedule specific to certain onboarding documents include:

Item	Records Description	Disposition Instruction
040	<b>Official Personnel Folder (OPF)/electronic OPF (eOPF).</b> The Official Personnel Folder (SF-66) or its approved electronic equivalent documents an individual’s employment history.	<b>Long-term records.</b> Records of separated employees saved to the “permanent” folder in the eOPF or filed on the right side of the hardcopy OPF.
041		<b>Short-term records.</b> Records of separated employees saved to the “temporary” folder in the eOPF or filed on the left side of the hardcopy OPF.
050	<b>Notifications of personnel actions.</b> Copies of SF-50, documenting all individual personnel actions such as hiring, promotions, transfers, and separation. Includes chronological files, fact sheets, general correspondence, and forms about pending personnel actions maintained by agency Human Resources offices.	<b>Temporary.</b> Destroy when business use ceases.
060	<b>Employment eligibility verification records.</b> Employment Eligibility Verification form I-9 and any supporting documentation.	<b>Temporary.</b> Destroy 3 years after employee separates from service or transfers to another agency.





## 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that the information collected when executing the Talent Acquisition function will be retained longer than is necessary to accomplish a legitimate purpose, or inconsistently with the records retention schedule.

**Mitigation:** This risk is mitigated. All offices throughout DHS are required to comply with relevant records management guidance. When feasible, technical mechanisms are built into systems and tools to allow for the automatic purging of data as appropriate. Standard Operating Procedures (SOP) and manual purging requirements are followed otherwise.

In the case of records pertaining to Talent Acquisition, DHS adheres to GRS 2.1. This GRS aligns with governing OPM regulations as OPM exercises oversight authority over DHS's Talent Acquisition processes and activities. DHS has a Department-wide records manager in its Headquarters OCIO whose job it is to promote compliance with all relevant records schedules across the Department. OCHCO also has an office-wide records manager, and each OCHCO division has a records custodian who manages day-to-day records compliance duties within that division and who reports to the office-wide records manager insofar as their records management role is concerned. Component HR offices are responsible for ensuring their own records management compliance but are nonetheless required to adhere to GRS 2.1.

## Section 6.0 Information Sharing

### 6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Information is routinely shared with OPM as the primary Human Capital authority for civilian federal agencies and with NFC for purposes of onboarding functions such as setting up payroll or benefits processing. This sharing is consistent with 5 U.S.C. § 552a(b)(3), under the applicable SORN, which permits the following sharing:

- 1) To obtain and disclose information to OPM as part of the candidate selection process through various staffing tools (e.g., USAJOBS, CASS, USA Staffing, USA Hire);
- 2) To disclose information to process payroll and benefit payroll deduction information for employees;
- 3) To disclose information to government training facilities (federal, state, local) and to non-government training facilities (e.g., private vendors of training courses or programs, private schools) for training purposes;
- 4) To disclose information to education institutions on appointment of a recent graduate to a position in the federal service, and to provide college and university officials with



information about their students working in the Pathways Program, Volunteer Service, or other similar programs necessary to a student's obtaining credit for the experience gained;

- 5) To disclose information necessary to FEGLI to verify election, declination, or waiver of regular and/or optional life insurance coverage or eligibility for payment of a claim for life insurance;
- 6) To disclose, to health insurance carriers contracting with OPM to provide a health benefits plan under the FEHB program, information necessary to identify enrollment in a plan, to verify eligibility for payment of a claim for health benefits, or to carry out the coordination or audit of benefit provisions of such contracts.
- 7) To disclose information to a federal, state, or local agency for determination of an individual's entitlement to benefits in connection with Federal Housing Administration programs;
- 8) To consider and select employees for incentive awards and other honors and to publicize those granted. This may include disclosure to other public and private organizations, including news media, that grant or publicize employee recognition;
- 9) To consider employees for recognition through quality step increases, and to publicize those granted. This may include disclosure to other public and private organizations, including news media, that grant or publicize employee recognition;
- 10) To disclose information to officials of labor organizations recognized under 5 U.S.C. § chapter 71 when relevant and necessary to their duties of exclusive representation concerning personnel policies, practices, and matters affecting working conditions;
- 11) To disclose information to officials from agencies who have oversight, as appropriate. These agencies include, but are not limited to: OPM, the Merit Systems Protection Board (MSPB), the Federal Labor Relations Authority (FLRA), the Government Accountability Office (GAO), and the Equal Employment Opportunity Commission (EEOC); and
- 12) To disclose the results of a drug test of a federal employee pursuant to an order of a court of competent jurisdiction when required by the U.S. Government to defend against any challenge against any adverse personnel action.

## **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

The SORNs applicable to records covered by the Talent Acquisition function permit the sharing of personnel and organizational records with external entities. The routine uses in the SORNs define the circumstances for when information may be shared externally. A complete list



of the routine uses can be found in the appropriate SORNs listed in Section 2.1. The following are examples of information sharing permitted by routine uses:

- Information may be shared with the Office of Federal Employees Group Life Insurance to verify election, declination, waiver of regular and/or optional life insurance coverage, or eligibility for payment of a claim for life insurance, or to TSP to verify election change and designation of beneficiary (*Routine Use E*, OPM/GOVT-1).
- Information may be shared with health insurance carriers contracting with OPM to provide a health benefits plan under the Federal Employees Health Benefits Program, information necessary to identify enrollment in a plan, to verify eligibility for payment of a claim for health benefits, or to carry out the coordination or audit of Benefit provisions of such contracts (*Routine Use F*, OPM/GOVT-1).
- Information may be shared with any source from which additional information is requested (to the extent necessary to identify the individual, inform the source of the purpose(s) of the request, and to identify the type of information requested), when necessary to obtain information relevant to an agency decision to hire or retain and employee, issue a security clearance, conduct a security or suitability investigation of an individual, classify jobs, let a contract, or issue a license, grant, or other benefits (*Routine Use L*, OPM/GOVT-1).
- Information may be shared with a federal agency in the executive, legislative, or judicial branch of government, in response to its request, or at the initiation of the agency maintaining records, information in connection with the hiring of an employee, the issuance of a security clearance or determination concerning eligibility to hold a sensitive position, the conducting of an investigation for purposes of a credentialing, national security, fitness, or suitability adjudication concerning an individual, the classifying or designation of jobs, the letting of a contract, the issuance of a license, grant, or other benefit by the requesting agency, or the lawful statutory, administrative, or investigative purpose of the agency to the extent that the information is relevant and necessary to the requesting agency's decision (*Routine Use M*, OPM/GOVT-1).
- Information may be shared with federal agencies to refer applicants, including current and former federal employees, for consideration for employment, transfer, reassignment, reinstatement, or promotion (*Routine Use A*, OPM/GOVT-5).
- Information may be shared with a federal agency, in response to its request, in connection with hiring or retaining an employee, issuing a security clearance, conducting a security or suitability investigation of an individual, classifying positions, letting a contract, or issuing a license, grant, or other benefit by the requesting agency, to the extent that the information is relevant and necessary to the requesting agency's decision in the matter (*Routing Use E*, OPM/GOVT-5).



- Information may be shared with federal, state, local, tribal, foreign or international agency, if the information is relevant and necessary to a requesting agency's decision concerning the hiring or retention of an individual, the issuance of a security clearance, license, contract, grant, delegation or designation of authority, or other benefit, or if the information is relevant and necessary to a DHS decision concerning the hiring or retention of an employee, the issuance of a security clearance, the reporting of an investigation of an employee, the letting of a contract, or the issuance of a license, grant, delegation or designation of authority, or other benefit and disclosure is appropriate to the proper performance of the official duties of the person making the request (*Routine Use H*, DHS/ALL-023).
- Substance abuse records may be shared with medical personnel to the extent necessary to meet a bona fide medical emergency; with qualified personnel for the purpose of conducting scientific research, management audits, financial audits, or program evaluation provided that employees are individually identified; to the employee's medical review official; to the administrator of any Employee Assistance Program in which the employee is receiving counseling or treatment or is otherwise participating; to any supervisory or management official within the employee's agency having authority to take adverse personnel action against such employee; or pursuant to the order of a court of competent jurisdiction where required by the federal government to defend against any challenge against any adverse personnel action (*Routine Uses A-F*, DHS/ALL-022).

### **6.3 Does the project place limitations on re-dissemination?**

Yes. Some of the information collected, maintained, used, and disseminated by DHS when executing the Talent Acquisition function is shared with OPM and NFC. Those agencies are bound by the Privacy Act and other relevant federal information governance laws and regulations in the same way as DHS to limit further dissemination of the information.

### **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

DHS, OPM, and NFC systems use auditing tools and procedures to ensure accountability of access by users, to reconstruct events, to detect intrusions, and to identify problems. All the systems that support Talent Acquisition comply with National Institutes of Standards and Technology (NIST) security controls. All systems also have audit trail records that are maintained online for a brief period, are periodically reviewed by system personnel, and are preserved for the periods prescribed in the associated records retention schedules.



## 6.5 Privacy Impact Analysis: Related to Information Sharing

**Privacy Risk:** There is a risk that individuals authorized to access information collected to support DHS's Talent Acquisition function will share information with unauthorized recipients.

**Mitigation:** This risk is mitigated. All information collected, maintained, used, and disseminated by DHS when executing the Talent Acquisition function is covered by the Privacy Act. As such, information is only disseminated consistent with the routine uses identified in the above SORNs. All HR personnel also complete annual privacy training that discusses proper use and disclosure of PII. Any employee who shares information in an unauthorized fashion is subject to discipline, up to and including removal. Additionally, all user accounts for systems that support Talent Acquisition require approval from the system owner and the ISSO. These systems also have audit logs that collect details on who accessed the system and when.

## Section 7.0 Redress

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

Applicants may access their profiles within USAJOBS at any time. Employee records collected, maintained, used, and disseminated by DHS are covered by the Privacy Act. Employees may file a Privacy Act or Freedom of Information Act (FOIA) request with DHS or OPM to access their personnel records. If an individual would like to file a Privacy Act or FOIA request to view his or her record, he or she may mail the request to the following address (or applicable Component):

Chief Privacy Officer/Chief Freedom of Information Act Officer  
Privacy Office, Mail Stop 0655  
Department of Homeland Security  
2707 Martin Luther King, Jr. Avenue SE  
Washington, D.C. 20528-065

These requests must be in writing and include the requestor's daytime phone number, email address, and as much information as possible of the subject matter to expedite the search process. Specific Component FOIA contact information can be found at <http://www.dhs.gov/foia> under "Contact Information." 6 CFR Part 5, Subpart B, provides the rules for requesting access to Privacy Act records maintained by DHS.



In addition, employees may access personnel data about themselves via NFC's Employee Self Service page (MyEPP).<sup>46</sup>

## **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

Applicants may update and change their profiles within USAJOBS at any time. If an applicant knows of any inaccurate or erroneous information about himself or herself in any of the other systems that support Talent Acquisition, the individual may contact the HR specialist handling the application who will liaise with the appropriate personnel to correct the information. New hires may also contact HR specialists within their office and Component to correct inaccurate or erroneous information, or they may submit an HR ticket through FedHR Navigator to request correction of inaccurate or erroneous information.

## **7.3 How does the project notify individuals about the procedures for correcting their information?**

Applicants are provided with the name, phone number, and email of an HR specialist who serves as the primary point of contact for a specific job announcement via USAJOBS. The applicant and the HR specialist are in regular communication between the time the applicant receives a TJO and the time the applicant attends new employee orientation. For new hires, each DHS organization has one or more designated HR specialists to assist with HR needs. The names and titles of these individuals are common knowledge throughout organizations and are reflected on organization charts. Employees may also reach out to OCHCO or any of the Component Human Capital Offices using the general HR phone numbers and email addresses posted on the DHS employee intranet site. Additionally, they may submit an HR service ticket through FedHR Navigator to correct inaccurate information, or they may correct some of their personal information themselves via NFC's MyEPP. Links to FedHR Navigator and MyEPP are prominently displayed on the DHS employee intranet homepage.

## **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that applicants and employees will not be able to access, correct, or amend their application and onboarding materials and forms.

**Mitigation:** This risk is mitigated. Applicants can correct and amend information they submit directly in USAJOBS. They may also contact the HR specialist handling their applications to pursue correction of information. New hires can additionally use MyEPP to update and correct

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<sup>46</sup> See NATIONAL FINANCE CENTER, FEDERAL HUMAN CAPITAL BUSINESS REFERENCE MODEL (HCBRM), MY EMPLOYEE PERSONNEL PAGE, available at <https://www.nfc.usda.gov/EPPS>.



their personnel data. Like applicants, new hires and employees also have HR representatives assigned to them who can assist with all types of HR matters. Moreover, all government personnel records are covered by the Privacy Act, and fall under the general personnel records SORNs managed and maintained by DHS and OPM. There are Privacy Act Statements on all OPM and DHS IT systems that alert candidates and new employees that their records are afforded Privacy Act protections.

## Section 8.0 Auditing and Accountability

### 8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

OCHCO has a Privacy SOP that aligns with all the information management practices covered in this PIA. Components have similar guidance that ensures information is managed in accordance with laws, regulations and policies, including those issued by the DHS Privacy Office. Additionally, HR specialists who handle applicant and new hire information have specific roles in the Talent Acquisition process and are only provided information that is directly related to those roles. Similarly, access to systems that support Talent Acquisition are determined by the role to be performed by the user. In this way, the information viewed by the privileged or general user is based on the role being performed and the “need to know” principle. Audit trails are also reviewed to ensure the appropriate handling of information.

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

All OCHCO and Component HR personnel complete Privacy and IT Security Awareness Training at least annually. System, database, and application administrators also must complete privileged user training, system administrator training, and incident response training prior to assuming those roles. Additionally, DHS conducts annual audits, and HR specialists complete DHS certification training consistent with OPM’s *Delegated Examining Operations Handbook*.<sup>47</sup> DHS hiring authorities must also establish an internal accountability system and conduct annual self-audits of delegated examining activities.

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<sup>47</sup> See U.S. OFFICE OF PERSONNEL MANAGEMENT, DELEGATED EXAMINING OPERATIONS HANDBOOK: A GUIDE FOR FEDERAL AGENCY EXAMINING OFFICES (JUNE 2019), available at [https://www.opm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo\\_handbook.pdf](https://www.opm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo_handbook.pdf).



### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

All DHS HR offices manage their own employee access to OPM and NFC systems, as well as user accounts for their internal HR IT systems. Users are required to attend role-based security training and sign Rules of Behavior and a DHS Non-Disclosure Agreement prior to being granted access to systems. They are also required to annually complete privacy and IT security awareness training.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

All information sharing agreements with OPM and NFC are reviewed and approved by the individual HR offices for consistency with applicable laws, regulations, and policies governing the appropriate sharing of information outside the Department. The DHS Privacy Office and Component Privacy Offices are engaged when appropriate.

#### **Responsible Official**

Donna Seymour  
Director, Human Capital Business Solutions  
Office of the Chief Human Capital Officer  
U.S. Department of Homeland Security  
(202) 357-8375

#### **Approval Signature**

Original, signed copy on file with the DHS Privacy Office.

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Dena Kozanas  
Chief Privacy Officer  
U.S. Department of Homeland Security  
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## Appendix

*(last updated March 14, 2023)*

The following IT systems are used by DHS hiring authorities for the collection, use, dissemination, and maintenance of information from members of the public during the hiring and onboarding process in addition to the standard systems mentioned above and are covered by this PIA.

### DHS Headquarters (DHS HQ)

**HireVue** is used to support the interview portion of DHS's Talent Acquisition workflow. HireVue has the capability to host video interviews and allows interviewees to schedule their own interviews and conduct them either live or on their own time. HireVue assessments combine video, scenario-based questions, and game-based technology with the objective of rapidly and accurately identifying the best candidates while minimizing bias in the selection process. Live interviews use audio and video to connect hiring managers and recruiters in real-time. On demand video interviews allow candidates to interview on their own time by recording answers to job-relevant, structured interview questions at their convenience and without the hiring manager's presence. The platform also allows for branded communications, candidate management dashboards, and other features designed to simplify the hiring process and reduce time-to-hire.<sup>48</sup>

### U.S. Customs and Border Protection (CBP)

**CBP Automated Testing Service (CATS)** is a commercially-available automated system that provides nationwide testing and proctored test administration services for CBP promotion positions. The CBP Office of Human Resources Management (HRM) Personnel Research and Assessment Division (PRAD) develops, implements, and analyzes assessments for selection, career development, and promotion into mission critical occupations within CBP. CBP offers in-person proctored exams at vendor run test centers around the country as well as vendor supplied remote proctored exams. CBP conducts remote exams using the CATS system, which records video. Each year, CBP uses CATS to administer thousands of competency-based assessments to CBP Officers, CBP Agriculture Specialists, Border Patrol Agents, Air Interdiction Agents, Aviation Enforcement Agents, and Marine Interdiction Agents. The types of assessments administered online via CATS include job knowledge tests, logical reasoning assessments, job

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<sup>48</sup> HireVue also offers the ability to leverage artificial intelligence to evaluate a candidate's work style, how they work with people, and general cognitive ability. DHS will not purchase or use any features that leverage artificial intelligence as part of candidate assessments. All candidates will be assessed solely based on their answers to the assessment questions and not on computer-aided analysis of eye movements, subtle and momentary facial expressions, or other factors not typically considered during an in-person interview.



simulations, writing skills assessments, and writing samples. The following are user groups of CATS:

- *DHS/CBP Employees and Applicants* (members of the public): schedule testing sessions, complete assessments during an in-person proctored test session or the vendor supplied remote proctored online assessment, and access score reports. If an applicant utilizes the option to take the assessment virtually, a proctor will join the scheduled assessment virtually online, introduce themselves to the applicant and ask the applicant to display a Driver's License, State Issued ID, or Passport ID on the screen to allow the proctor to verify the individual's identity before the assessment begins. The examination as well as the identification process are recorded through the vendor's software. Although the applicant's ID is recorded in the video for auditing purposes, the ID number is not tracked in the system. The audio and video recordings of remotely proctored assessments, images of examinees, and images of examinees' identification documents collected by the third-party vendor during promotional testing are stored on the third-party vendor's system for two months after the testing open period has concluded.
- *CATS Contractor Personnel*: program the assessments into the system, document candidates' attendance at their scheduled test session/site or participate in the vendor supplied remote proctored online assessment, and report any issues encountered during the session.
- *PRAD Staff*: manage the testing program, retrieve candidate information, and verify testing services provided.

U.S. Immigration Customs Enforcement (ICE) previously used CATS to facilitate the testing process for promotions. As of June 1, 2018, only CBP uses CATS.

**CBP Online Applicant Competency Assessment Service (COACA)** is considered a subsystem for CATS and is an automated system that provides nationwide testing and proctored test administration services for CBP applicant positions. Applicants create a username and password on the vendor-owned platform to login to the COACA system. CBP Office of Human Resources Management (HRM) Personnel Research and Assessment Division (PRAD) develops, implements, and analyzes assessments for entry-level selection and mission-critical occupations, including Border Patrol Agents and CBP Officers. The type of assessments administered online via COACA may be adaptive or non-adaptive tests.<sup>49</sup> The following are user groups of COACA:

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<sup>49</sup> A non-adaptive test (also known as static) is a fixed set of questions that vary in difficulty level, and every applicant answers the same questions. An adaptive test (also called a Computer Adaptive Test or CAT) refers to a test that has a large number of test questions of varying difficulty level.



- *Applicants* (members of the public): schedule testing session, request reasonable accommodations (yes or no response only), complete assessments during a proctored test session, and access score reports. If an applicant selects “yes” to request reasonable accommodations, a system-generated email is sent to the PRAD staff. PRAD staff will then reach out directly to the applicant and determine what accommodations are requested.
- *COACA Contractor personnel*: program the assessments into the system, document candidates’ attendance at their scheduled test session/site, and report any issues encountered during the session.
- *PRAD staff*: manage the testing program, retrieve candidate information, manage requests for reasonable accommodations, and verify testing services provided.

**Cornerstone:** Cornerstone<sup>50</sup> is a workflow tool and centralized repository that contains the consolidated data from background check requests and results for CBP applicants and employees to determine their suitability, or continued suitability, for employment or for a security clearance.

**Human Resources Business Engine (HRBE):** HRBE<sup>51</sup> is a web-based unified workflow database for CBP human resources management to track entry-level and non-entry level hiring processes. The human resources processes in HRBE include information about hiring and pre-employment processing, labor and employee relations, performance management, random drug testing, issue tracking, safety tracking, and change management.

**HRM Online Applicant Interview Platform and Scheduling System (IPSS)** is a cloud-based product procured to support the interview portion of CBP’s Talent Acquisition workflow to schedule and conduct online interviews. The CBP Hiring Center will manually create a profile in the system for applicants who are tentatively selected for a CBP position with an assessment or interview requirement and the applicants will be able to complete their interview using the IPSS platform. IPSS will allow CBP hiring managers to access candidate management dashboards and interview schedules, conduct and record online interviews, view the applicant’s completed assessment questions during the live interviews, and manually record the interview results. A system interconnection between IPSS and HRBE will be set up to coordinate scheduling and sharing the results for the online interviews. CBP will establish a system interconnection between IPSS and Cornerstone, which will also feed the results of the applicant’s interview to DHS’s ISMS.

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<sup>50</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE CORNERSTONE, DHS/CBP/PIA-038, *available at* <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.

<sup>51</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, PRIVACY IMPACT ASSESSMENT FOR THE HUMAN RESOURCES BUSINESS ENGINE (HRBE), DHS/CBP/PIA-032, *available at* <https://www.dhs.gov/privacy-documents-us-customs-and-border-protection>.



**Salesforce Background Investigation (BI) Tracking Application** resides on the Salesforce Government Cloud platform and is a data solution to centrally track the status of and communication about the background investigation process for CBP contractor positions. While the eQIP process is handled outside of the Salesforce BI Tracking system, the CBP Office of Information and Technology (OIT) Workforce Management Division has the responsibility of viewing and tracking the status of the eQIP process for all contractor candidates and notifying the Contracting Officer Representative (COR), Project Managers, and candidates when there is a status update received from the CBP Office of Professional Responsibility. The CBP OIT uses the BI Tracking Application to gather data on candidates and streamline the process of uploading necessary forms, routing candidates through the approval process, and coordinating necessary information to provide greater visibility into the status of a contractor background investigation.

CBP is able to initiate a visitor request to grant candidates access to CBP buildings during the BI process. CBP OIT enters details regarding the candidate's visit in the system and the CBP building guards are able to search the system to determine if the candidate has the ability to enter the facility.

**Salesforce Contact Center Application** is used for CBP's hiring call center, which allows individuals and applicants to contact CBP to receive answers to questions about positions with CBP or to keep track of their current application status. CBP will capture candidate and applicant directed questions about CBP positions for queueing, upload necessary documentation to assist candidates with the hiring process, and track follow up communication by the CBP Office of Human Resources (HRM). The Salesforce Contact Center Application provides the ability to create and track cases within the system associated with person accounts, and to provide responses to individual candidates or applicants via email from the following address: [CBPApplicantContactCenter@cbp.dhs.gov](mailto:CBPApplicantContactCenter@cbp.dhs.gov).

Application status information is automatically transmitted from HRBE and USA Staffing to the Salesforce Contact Center Application. The Salesforce Contact Center Application will display a view of an individual's application status details from HRBE for all CBP applicants. HRBE will send updates to Salesforce as they occur. A similar process will run to match applicant data within USA Staffing with candidate data in Salesforce. If a match is found, the candidate will be marked in Salesforce as having applied. CBP is also able to generate reports on the candidate to applicant conversion rates to support marketing and advertising decisions based on this information.

CBP has established an applicant portal utilizing a system interconnection between OPM's USAJOBS system and CBP's Salesforce Contact Center Application. Applicants can login to the new CBP portal, [MyApplication.cbp.gov](http://MyApplication.cbp.gov), by using their established USAJOBS login information and can then view the status of their applications and communicate with the CBP Hiring Center in



order to obtain more information. Applicants will see all of their active applications with CBP and can connect with their case workers by submitting questions electronically throughout the hiring process. This new applicant portal replaced the CBP Jobs mobile application in September 2020. After the individual logs in to the portal using their USAJOBS login information, the system automatically matches their USAJOBS unique identifier to the HRBE and USA Staffing data maintained in the Salesforce person account, if one already exists. If the individual has an active application with CBP, the system will automatically match the USAJOBS ID to the Salesforce person account and display their application data. Salesforce person accounts are also created by CBP personnel during interactions with applicants, such as phone calls and emails and will not include the USAJOBS unique identifier unless the individual has logged into the CBP portal. If the individual doesn't already have a Salesforce person account when they log into this new portal, the Salesforce Contact Center Application will automatically create an account using data integration received from HRBE and USA Staffing.

Salesforce Contact Center Application also allows candidates, applicants, and CBP the ability to upload attachments and templates to cases. When a candidate or applicant emails an attachment to CBP, the attachment automatically uploads to a case within Salesforce.

**Salesforce Recruitment Application** is a Salesforce Customer Relationship Manager (CRM) tool that CBP HRM uses to support the recruiting process for all CBP positions. Candidates interested in any CBP position can provide their contact information and career interests to CBP at career fairs and other recruitment events or by registering online. Upon receiving the candidate's information, the Salesforce Recruitment Application shares limited PII, such as the name of the individual and email address, and their subscriber status (subscribed/unsubscribed) with Adobe Campaign,<sup>52</sup> which places the candidate in a targeted communication journey thanking the candidate for signing up for the email distribution list and providing information on the position of interest the candidate selected. Adobe Campaign will also provide applicant status e-mails to individuals who have applied for a CBP position by providing notification of receipt, tentative selection, polygraph queue, and medical process status during the application process.

An individual can opt-out of CBP's information collection in both systems by not submitting their information to CBP. Alternatively, if an individual signed up to join the CBP Talent Network, the individual can submit a request to CBP to remove their information from the Salesforce Recruitment Application by selecting the "opt-out" option in the email communication and no further recruitment communication will be sent to the candidate. An applicant must receive communication from CBP via Adobe Campaign in order to continue in the hiring process. If the

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<sup>52</sup> Adobe Campaign Cloud Software as a Service (SaaS) provides email campaign, job offer, and personalization management capabilities for sophisticated automation and execution of marketing programs across virtually all channels – digital and traditional.



applicant does not want to receive this communication, they must withdraw their application with CBP.

Using Mulesoft, an integration middle layer, HRBE and USA Staffing data for CBP applicants is passed into the Recruitment Application. CBP recruiters are able to access the Salesforce Recruitment Application and see the individual's career interests and verify applicants' status for each step of the hiring process, including whether the step within the hiring process has been completed, review has been completed (or is pending), or the applicant passed or failed that element. The use of the Salesforce Recruitment Application provides candidates, applicants, and CBP the ability to upload attachments.

**Salesforce Retirement and Benefits Application** gives CBP employees the ability to submit retirement and benefits-related questions and supporting documentation. Submitting this information into a central repository allows HR staff to track decisions and provide prompt and accurate responses and case status updates to employees. Submitted questions will be triaged and responded to by HR specialists, who will have the option of involving additional HR staff with expertise in the relevant functional areas. In the event that a CBP employee dies from an injury sustained in the line of duty, CBP uses the Death Gratuity Information Sheet to collect information from the next of kin or personal representative of the employee and the information is stored in the Salesforce Retirement and Benefits Application.<sup>53</sup> In addition, metrics will be captured and reported to allow HR management to focus resources on the areas with highest volume in order to improve overall customer satisfaction.

#### Federal Emergency Management Agency (FEMA)

**CareerConnector**, the Department of Treasury's automated staffing solution, allows FEMA to hire individuals into Reservist positions. This system is used to create vacancy announcements, review resumes and supporting documentation, and notify applicants of their status.

#### U.S. Immigration and Customs Enforcement (ICE)

**Electronic System for Personnel (ESP)** is an automated web-based system used to process ICE personnel actions pertaining to employment and payroll administrative functions. During the initial recruitment stage, a personnel action is created in ESP for the vacancy and a copy is sent to HITS. When the selectee has completed the hiring process and received an official position offer from ICE, ICE hiring personnel enter the selectee's information into ESP to close the recruitment process. This is the only time that information about non-DHS employees is

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<sup>53</sup> For detailed information about the U.S. Office of Personnel Management (OPM) guidance and additional processes related to the Death Gratuity Payment Authority, see OPM Memorandum Number 96-109, available at <https://www.opm.gov/retirement-services/publications-forms/benefits-administration-letters/1996/96-109.pdf>.



entered into the system. Once the selectee enters on duty and becomes an employee, additional information is included.

**Hiring Information Tracking System (HITS)** is used to track current and prior hiring actions. It maintains information about individuals who are selected for vacant positions at ICE and tracks them to the various stages of the hiring process. Once selected, ICE hiring personnel manually enter the following selectee information in HITS. Additional information about the selectee may be entered into the system depending on whether the selectee is currently an ICE employee, holds an active security clearance, or if the position requires a higher level of fitness proficiency than the one in which the selectee is certified.

**Table of Organization Position System (TOPS)** is part of the Office of the Chief Financial Officer (OCFO) and maintains information about individuals who are employed by ICE and the United States Citizenship and Immigration Services (USCIS), i.e., current and former employees. TOPS provides OCFO with a means to (1) exercise control over position vacancies; (2) maintain the agency's Table of Organization; (3) track positions throughout their life cycle; (4) link employees to positions; (5) support budgetary needs in determining and projecting costs of positions; (6) reconstruct and display the work force as it existed at a given time in any particular prior year; (7) provide the users a means of quickly and easily obtaining information; and (8) provide program offices with the capability to efficiently create staff-to-budget projections. TOPS receives employee information, including name, Social Security number (SSN), and position information from the U.S. Department of Agriculture (USDA) National Finance Center (NFC). TOPS sends position information to the ICE Electronic System for Personnel (ESP) and the ICE Hiring Information Tracking System (HITS). TOPS connects with HITS to support personnel and hiring actions within ICE. When employee profiles are added or changed within HITS, HITS executes a database data call to TOPS to retrieve and populate position data within HITS. TOPS connects with ESP to verify the accuracy of position information in ESP. TOPS automatically sends organization codes, position data, and titles to ESP, which enables ESP to process the U.S. Office of Personnel Management's (OPM) Standard Form-52, Request for Personnel Action.

**Workforce Management (WM) Module within the Resource and Asset Management System (RAMS)** is an information management and analysis system used by the ICE Office of Homeland Security Investigations (HSI) to coordinate and track all aspects of HSI recruitment and hiring. WM collects, processes, and maintains information about: (1) applicants for ICE-HSI positions; (2) newly hired employees and employees already onboard; (3) former employees of ICE-HSI; (4) the dependents of employees of HSI-International who are serving on a foreign duty station; and (5) foreign nationals who are locally hired by overseas ICE offices.

Transportation Security Administration (TSA)



**Law Enforcement/Federal Air Marshal Service (LE/FAMS) Physical and Mental Health Certification:** LE/FAMS has established medical guidelines designed to ensure Federal Air Marshals (FAMs) can safely and effectively perform the tasks essential to the arduous, rigorous, and hazardous functions of the FAM position. The medical guidelines ensure a level of health status and physical and psychological fitness for this public safety law enforcement position that requires a high degree of responsibility. Medical examinations help determine a FAM applicant and FAM incumbent's medical status. FAM applicants are not asked any medical questions until after they have received a conditional offer of employment. FAM applicants must provide a completed TSA Form 1164, *Mental Health Certification* (MHC). Based on conditions identified during the pre-employment or recurrent periodic examination, the applicant/employee may be required to provide a completed and signed by his/her physician TSA Form 1133-3, *Practice Exercise Performance Requirements*, or TSA Form 1163, *Treating Physician Status Report* in order to determine if the FAM is medically qualified.

#### U.S. Citizenship and Immigration Services (USCIS)

**Fast Acquisition of Superior Talent Hire (FASTHire)** tracks and measures the length of time each step in the hiring process takes, as well as the volume of hiring actions across USCIS. The tool enables managers to track hiring timelines for each stage in the hiring process in relation to OPM timeline goals. Data is entered into the FASTHire database by USCIS Human Resources Operations Center staff during the hiring process.

**Student Volunteer Employment Program (SVEP)** provides students an opportunity to gain work experience while in school. To qualify, each prospective intern must be a U.S. Citizen, 16 years of age, and enrolled in at least half-time academic or vocational and technical course load in an accredited educational institution. Prospective interns' email USCIS with their preferred location(s) desired area(s) of interest, attach a copy of his/her resume as well as their school transcripts to verify his/her enrollment as a student.

The USCIS Office of Human Capital and Training created a recruitment mailbox to support offices who wish to hire non-paid interns under SVEP. The recruitment mailbox lists students by location as well as area of interest, making it easy to identify prospective interns. If students are contacted via email for a volunteer opportunity, the USCIS hiring manager guides the student through the next steps that need to be taken, which includes sending in the proper paperwork to the HR Specialist to onboard.

**Human Resource End-to-End (HR-E2E)** consists of two integrated, vendor-hosted component applications:

- **Monster Hiring Management Enterprise (MHME)** - a secure, comprehensive talent acquisition system, purpose-built to automate and accelerate the federal





hiring process. Fully integrated with USAJOBS, HR Connect services, Government HRIS systems and assessments, the system provides applicants and hiring managers a simpler, easier, and faster way to navigate the federal government's hiring process.

- UpTick (a Personnel Action Request system) - a connected software-as-a-service system that will receive and store relevant workflow status updates, and when needed – relevant job applicant information.

These applications collectively provide USCIS with applicant tracking, classification, and onboarding automated services as well as other HR personnel services. The purpose of HR-E2E is to provide specific USCIS HR and hiring managers the ability to create key documents and manage processes relevant to classification, hiring and onboarding

### United States Secret Service (USSS)

**USSS Medical Program Use of FedHealth:** The USSS Safety and Health Division contracts with the U.S. Department of Health and Human Services (HHS), Federal Occupational Health (FOH) to conduct employee and pre-employment medical examinations. FOH provides the USSS Safety and Health Division access to the FOH scheduling, billing, and results modules in FedHealth. USSS uses FedHealth to administer multiple medical examination program requirements for all weapon-carrying positions within USSS. Both USSS employees and pre-employment candidates appear for an appointment at an FOH facility and, prior to the examination, sign a form authorizing FOH to release medical results to the USSS. The medical examination results are then used to determine fitness for employment/duty.