Privacy Impact Assessment (PIA) Update for the

Performance and Learning Management System (PALMS)

DHS/ALL/PIA-049(a)

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Abstract

The Department of Homeland Security (DHS) Office of the Chief Human Capital Officer (OCHCO) originally procured the DHS Performance and Learning Management System (PALMS) to facilitate the employee performance management process and consolidate the existing DHS Component learning management systems that support workforce training. DHS is providing this Privacy Impact Assessment (PIA) Update to reflect the changes that have occurred to PALMS since the original PIA was published. This PIA Update will reflect the removal of the Performance Management module from PALMS, and provide updates on Component use, technical enhancements, and new categories of individuals.

Overview

In the Privacy Impact Assessment (PIA) published on January 23, 2015,[1] the Department of Homeland Security (DHS) described the Department's acquisition and development of the DHS Performance and Learning Management System (PALMS). The DHS Office of the Chief Information Officer (OCIO) and Office of the Chief Human Capital Officer (OCHCO) acquired PALMS to serve as an enterprise-wide system, to automate the paper-based employee performance management process and consolidate multiple redundant e-training systems into a single integrated platform. PALMS consisted of two discrete modules: Learning Management and Performance Management.

The Learning Management module manages the life-cycle of learning activities for DHS employees and contractors. It acts as the gateway for learners, trainers, supervisors, and administrators to access training at DHS. The Learning Management module maintains and updates user records, training histories, individual development plans, course catalogs, training resources, and training requirements. DHS shares personally identifiable information (PII) with the Office of Personnel Management (OPM) to report on required training metrics and with other oversight entities.

The Performance Management module was supposed to electronically document performance expectations discussed by supervisors and employees at the beginning of the performance period, record Interim Progress Reviews and Mid-Year Performance evaluations, and formally capture supervisory evaluations and employee performance ratings at the conclusion of the performance cycle. However, the Department decided to discontinue the Performance Management module for the DHS enterprise.[2] The Performance Management decommissioning process, which entailed the complete removal of the Performance Management module from PALMS, was completed in May 2017. Moving forward, PALMS will only consist of the Learning

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[1] *See* DHS/ALL/PIA-049 Performance and Learning Management System (PALMS), *available at* https://www.dhs.gov/privacy.

[2] Based on business cases presented by multiple DHS Components, it was determined that implementation of the Performance Management module did not meet the Department's needs.

Management module.

Reason for the PIA Update

A wide range of changes has occurred since the original PIA was published. These changes are described below.

1) Initially, PALMS consisted of two discrete modules: Learning Management and Performance Management. However, DHS decided to discontinue the use of the Performance Management module for the entire DHS enterprise (*i.e.*, all DHS Components). As a result, the Performance Management module was decommissioned in May 2017. The Performance Management module and all related data, data tables, and processes were removed from PALMS. The Performance Management module was never used by any DHS Component with the exception of DHS Headquarters (HQ) conducting a small pilot with twenty-three (23) participants. Therefore, the amount of data in the Performance Management module was minimal. After the Performance Management module was removed and decommissioned, the Learning Management module is now the only remaining and operational module in PALMS. DHS will continue to use the Learning Management module as described in the original PIA.

2) Initially, PALMS was to be used by all DHS Components within the enterprise. However, PALMS will only be used by six (6) DHS Components, which are:

- U.S. Customs and Border Protection (CBP);

- Headquarters (HQ);[3]

- Federal Law Enforcement Training Centers (FLETC);

- U.S. Immigration and Customs Enforcement (ICE);

- U.S. Citizenship and Immigration Services (USCIS); and

- U.S. Secret Service (USSS).

PALMS will not be used by three (3) DHS Components, which are:

- U.S. Coast Guard (USCG);

- Transportation Security Administration (TSA); and

- Federal Emergency Management Agency (FEMA).

The information outlined in this PIA Update and the original PIA does not apply to

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[3] HQ Components such as the Science and Technology Directorate (S&T) and the National Protection and Programs Directorate (NPPD) are serviced by HQ for personal actions; thus, those HQ Components are included here under HQ.

USCG, TSA, and FEMA.

3) A new daily load of PALMS user account information, via the Trusted Identity Exchange (TIE),[4] from the Information Security Management System (ISMS)[5] and the Application Authentication System (AppAuth)[6] has been implemented. The daily load is a partial download of user account information that provides a minimum set of data for new users to have an active PALMS account when they onboard so that they can complete required training as soon as possible. This daily load offers relief from waiting until the bi-weekly load of data from the National Finance Center (NFC) Payroll Personnel System (PPS)[7] to populate PALMS. Although there is a new daily load process, the bi-weekly load will continue to run so that the remainder of the data for each user account is populated in PALMS based on data from NFC PPS.[8] The purpose of the new daily load is to allow new DHS personnel to be made aware of and complete required trainings as early as possible.

4) A new data field has been added to the user feed[9] that provisions users in PALMS. The new data field is the Electronic Data Interchange Personal Identifier (EDIPI) number. The EDIPI number is obtained from ISMS. The EDIPI number is a unique number assigned to the Personal Identity Verification (PIV) card that uniquely identifies each user. The EDIPI number will be used by Component PALMS administrators when troubleshooting user access issues to PALMS.

5) Due to unique mission requirements and training purposes,[10] ICE will be the sole Component that will grant state, local, and tribal users access to PALMS, in addition to the federal employees and contractors already being granted access. ICE manually

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[4] *See* DHS/ALL/PIA-050 DHS Trusted Identity Exchange, *available at* https://www.dhs.gov/privacy.
[5] *See* DHS/ALL/PIA-038 Integrated Security Management System (ISMS), *available at* https://www.dhs.gov/privacy.
[6] *See* DHS/ALL/PIA-060 Application Authentication System (AppAuth), *available at* https://www.dhs.gov/privacy.
[7] The National Finance Center (NFC) Payroll Personnel System (PPS) is an integrated payroll/personnel system offering a full range of personnel and payroll processing. It processes personnel actions; awards; allotments; bonds; performance appraisals; health and life insurance; thrift savings plan; tax documents; severance pay; leave records; and payroll related financial reporting operations. PALMS retrieves employee account information on a bi-weekly basis from NFC PPS. For more information, please *see* NFC PPS Payroll Personnel System (PPS) Redacted PIA, *available at* https://www.usda.gov/home/privacy-policy/privacy-impact-assessments.
[8] The process includes rules to ensure there is no overlap or duplicate data entered into PALMS. If a record already exists in PALMS from the initial daily load, a new record is not added during the bi-weekly load; only new information from NFC is added to an individual's existing record in PALMS.
[9] The user feed is the process that provisions user accounts in PALMS. The user feed establishes new active accounts for new employees, and also deactivates accounts for users who leave a DHS Component or leave DHS.
[10] ICE adds state, local, and tribal users to PALMS because ICE does not receive their information as part of the NFC feed into PALMS. These are users that access and use PALMS with PIV cards. For example, ICE loads information about state and local law enforcement officers authorized pursuant to Section 287(g) of the U.S. Immigration and Nationality Act to perform certain immigration-related activities, as they have specific training requirements. These users, as with ICE-led task force users, are acting under ICE's authority when performing their authorized immigration-related or task force duties - essentially, they are deputized.

loads the information about these state, local, and tribal users. All other Components using PALMS will only load federal and contractor employee data.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

Authorities and Other Requirements

Because PALMS no longer has a Performance Management module, the authorities that authorized the collection of information regarding performance are no longer relevant. Those authorities include the following:

- 5 CFR Part 430, Performance Management; and

- 5 CFR Part 432, Performance Based Reduction-in-Grade and Removal Actions.

Additionally, the OPM/GOVT-2 Employee Performance File System Records System of a Records Notice (SORN)[11] is no longer relevant because PALMS does not maintain this type of information.

Characterization of the Information

Removal of the Performance Management Module

All references to Performance Management and Performance Evaluations have been removed from the system because the Performance Management module in PALMS is no longer being used and has been decommissioned. Additionally, because the Performance Management module was never used by any DHS Component, with the exception of HQ conducting a small pilot that included twenty-three (23) participants, the amount of data in the Performance Management module was minimal. Because the Performance Management module was removed, performance evaluation records for federal employees will not be collected or maintained in PALMS. The data of the pilot participants from the Performance Management module was extracted, encrypted, and securely delivered in a one-time extract to the secure Human Capital Business Systems (HCBS)-Enterprise Integration Environment (EIE).[12]

PALMS will continue to collect and maintain data related to the Learning Management module, as outlined in the original PIA.

Connection to TIE and AppAuth

A new daily load of user account information is transmitted to PALMS to ensure that new users (employees, contractors, state/local partners, etc.) are able to immediately take mandatory

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[11] OPM/GOVT-2 Employee Performance File System Records, 71 FR 35342 (June 19, 2006).
[12] Because there was live data from the 23 participants used during the PALMS HQ pilot, DHS requires that the data be archived in accordance with DHS archival and retention policy. The data has been encrypted and is now in the secure HCBS-EIE environment.

trainings. The daily load only loads a partial amount of user data,[13] via the TIE, from ISMS and AppAuth. Therefore, the standard bi-weekly feed that loads a full set of user data from NFC PPS will continue to run so that all user account data is loaded into PALMS. PALMS is collecting the same data elements, it is just collecting some of the data elements at an earlier point in time to facilitate agency functions. This user account data is already outlined in the original PIA.

New Data Field

The daily and bi-weekly load of users into PALMS has been modified to collect the EDIPI number for users loaded into PALMS. Specifically, PALMS will be loaded with the EDIPI number obtained from ISMS. The EDIPI number is a unique number assigned to the PIV card that uniquely identifies each user. It allows Component administrators to identify a user when troubleshooting user access issues to PALMS. Because of its uniqueness, the EDIPI number aids in troubleshooting and making a determination on what to do with that PALMS user account that name and other data elements cannot. Only PALMS users with administrator access can view EDIPI of other users.

New/Additional PALMS Users

In addition to federal employee and contractor data, ICE will now grant state, local, and tribal users access to PALMS. The information collected from state, local, and tribal users consists of the same data elements collected from DHS personnel. These data elements are listed in the original PIA. However, these individuals will have their account information entered manually into PALMS.

There are no further changes related to how PALMS collects, uses, disseminates, or maintains data and information. The sources of the information and how the information is collected are described in the original PIA.

Uses of the Information

The original PIA describes how information is used for the Learning Management module and the Performance Management module. Because the Performance Management module will no longer be used and has been decommissioned, PALMS will not use any information related to employee performance management. However, DHS will continue to use the information for users of the Learning Management module, as described in the original PIA.

Privacy Risk: There is a risk that a PALMS user account could be established prior to the new employee start date or for users who may never eventually begin employment. The new PALMS daily load process will load users based on user data obtained from the security background system, ISMS. If ISMS shows that the individual's security authorization is pending, that individual is sent to PALMS so that a PALMS account can be created.

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[13] *See* Appendix A for a list of the data elements that will be uploaded daily to PALMS. These data elements are not new, they are simply being delivered prior to the bi-weekly load that PALMS receives normally.

Mitigation: Although a new employee may have a PALMS user account before his or her start date, the new PALMS account cannot be accessed without issuance of a PIV card that the new employee will receive on or shortly after his or her start date. Therefore, a new employee cannot access PALMS until his or her start date or shortly thereafter. For an individual who many never actually begin employment, a PALMS account is only created if the individual first has an Active Directory account. If one was never created, the individual would never have had a PALMS account created.

Notice

This PIA provides notice that DHS decommissioned the Performance Management module in PALMS. It also provides notice of the new connection for provisioning access, a new data element, and new users in PALMS. DHS continues to provide notice to employees regarding DHS's authorities to collect information, purpose for collection, sharing, and opportunity to opt out through the 2015 PIA, this PIA Update, and the Privacy Notice on the PALMS website.

Privacy Risk: There is a risk that individuals (who are provisioned in PALMS on behalf of ICE) from state, local, and tribal agencies may not receive proper notice of how their information will be collected and used.

Mitigation: These individuals are provided notice through the PALMS website. DHS provides notice on the collection of information for the Learning Management module through the Privacy Notice presented to individuals at the point of collection. Additionally, new users find out about system access through new employee orientation or from their supervisor. This PIA Update provides additional notice to users.

Data Retention by the Project

Since the original PALMS PIA publication, the data retention strategy has changed. The National Archives and Records Administration (NARA) has updated the retention schedule related to employee training records. DHS will now follow General Records Schedule 2.6, which states that training records will be destroyed when superseded, three (3) years old, or one (1) year after separation, whichever comes first. Therefore, the Learning Management module data will adhere to this defined data retention strategy.

The performance management data is no longer retained because the Performance Management module is no longer used and has been decommissioned.

Information Sharing

Employee performance plan and appraisal information from PALMS will not be shared with OPM because the Performance Management module will no longer be used and has been decommissioned. However, the information sharing process remains unchanged for the users of the Learning Management module, as described in the original PIA.

Redress

Federal employees who would have used the Performance Management module do not have a need to correct their individual information/data because it no longer resides in PALMS. However, the redress process remains unchanged for the users of the Learning Management module, as described in the original PIA. Individuals (who are provisioned in PALMS on behalf of ICE) from state, local, and tribal agencies have the same redress opportunities as DHS personnel.

Auditing and Accountability

Auditing and accountability security safeguards are not required for federal employees who would have used the performance management module because the Performance Management module will no longer be used and has been decommissioned. The auditing and accountability security and safeguards for users of the Learning Management module remains unchanged, as described in the original PIA.

Responsible Official

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Approval Signature

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

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Appendix A

Below is the list of data elements that will be uploaded to PALMS in a daily feed.

- Employee ID
- EDIPI
- Last Name
- First Name
- Middle Initial
- Email Address
- Organization ID
- Work City
- Work State
- Work Country ID
- Employee Status
- Gender
- Termination Date
- Entry on Duty Date