



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
703-235-0780, pia@dhs.gov  
www.dhs.gov/privacy

**Privacy Threshold Analysis**  
**Version date: December , 2008**  
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**PRIVACY THRESHOLD ANALYSIS (PTA)**

**This form is used to determine whether  
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, [www.dhs.gov/privacy](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.  
Upon receipt, the DHS Privacy Office will review this form  
and may request additional information.

### SUMMARY INFORMATION

**DATE submitted for review:** April 30, 2009

**NAME of Project:** Integrated Hiring Operations and Personnel (IHOP) Program

**Name of Component:** Transportation Security Administration

**Name of Project Manager:** Mohammed A. Taher

**Email for Project Manager:** Mohammed.Taher@dhs.gov

**Phone number for Project Manger:** 571-227-1141

**TYPE of Project:**

**Information Technology and/or System\***

**A Notice of Proposed Rule Making or a Final Rule.**

**Other: Provides a full range of human capital services, seamlessly, in an end-to-end process supporting the entire life cycle of the TSA employee.**

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\* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•“Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•“Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



## SPECIFIC QUESTIONS

**1. Describe the project and its purpose:**

The HRAccess Program is a replacement for Human Resource Services which is currently furnished by three contractors - Accenture, CPS, and AVUE. The contract will provide most of the Human Resource processing for TSA. Lockheed Martin will perform a wide range of Human Resource Services which include Recruitment and Hiring, Personnel, Payroll Processing, Workforce Planning, Position Management/Classification, Help Desk, Program Management, Project Management, Contractor Financial/Contract Management, Systems Integration, and Transition Services.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed: July 14, 2008

Date last updated:

Update of PTA in latest DHS format.

**3. Could the project relate in any way to an individual?<sup>1</sup>**

No. Please skip ahead to the next question.

Yes. Please provide a general description, below.

The System will provide the majority of Human Resource Services for employees of the Transportation Security Administration. As such it requires the collection, storage, and dissemination of a wide range of information about individuals. This information is required to meet the Human Resource needs of the agency.

**4. Do you collect, process, or retain information on: (Please check all that apply)**

DHS Employees

Contractors working on behalf of DHS

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<sup>1</sup> Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.



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The Public



**5. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)**

No.

Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

The system collects social security numbers because they are needed to keep records accurate. Other people may have the same name and birth date. Public Law 104-134 (April 26, 1996) asks Federal agencies to use this number to help identify individuals in agency records. Without the social security number the application may be deemed incomplete.

**6. What information about individuals could be collected, generated or retained?**

a. Personally Identifiable Information (PII) including name, social security number, bank account number, and residence address.

b. The full range of applicant and employee related data such as employee status, qualifications, benefits, and education.

**7. If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?**

No. Please continue to the next question.

Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

Yes. What type of data is recorded in the log? (Please choose all that apply.)

Header

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

**8. Can the system be accessed remotely?**

No.

Yes.

**9. When remote access is allowed, is the access accomplished by a virtual private network (VPN)?**



Yes

No

10. **Is Personally Identifiable Information<sup>2</sup> physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)**

No.

Yes.

11. **Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems?**

No

Yes. Please list:

12. **Are there regular data extractions from the system?**

No.

Yes. Are these extractions included as part of the Certification and Accreditation<sup>3</sup>?

Yes.

No.

13. **Is there a Certification & Accreditation record within OCIO's FISMA tracking system?**

Unknown.

No.

Yes. Please indicate the determinations for each of the following:

Confidentiality:     Low  Moderate  High  Undefined

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<sup>2</sup> Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

<sup>3</sup> This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)



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Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: May 5, 2009

NAME of the DHS Privacy Office Reviewer: Nathan Coleman

### DESIGNATION

This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System

#### Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other:

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
  - System covered by existing PIA: HRAccess is currently in draft
  - A new PIA is required.
  - A PIA Update is required.
- A SORN is required
  - System covered by existing SORN: DHS/TSA-022
  - A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS