UNITED STATES
FEDERAL COMMUNICATIONS COMMISSION

PRIVACY IMPACT ASSESSMENT (PIA) FOR THE PAYROLL AND HR BOUNDARY

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OFFICE OF GENERAL COUNSEL

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Record of Approval

Document Approval	
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Record of Approval

Date	Description	Author
04/19/2023	Validation of information – System Owner	Carol Edwards
04/19/2023	Validation of completeness – IT Compliance Lead	Liem Nguyen

Revision History

Date	Description	Name
03/01/2023	Original Document Created	ISSO - Ram Subramanian Privacy Advisor - Katherine Morehead Senior Agency Official for Privacy (SAOP) - Elliot S. Tarloff
03/30/2023	Revisions to Sections 1.2, 1.3A-1.3B, 1.4, 1.5, and 1.6	Privacy Advisor & SAOP
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Payroll and HR Boundary

1.1. Introduction

Section 208 of the E-Government Act of 2002[1] requires agencies to conduct a **Privacy Impact Assessment (PIA)** whenever they procure or develop an information technology system that will collect, maintain, or disseminate information about individual people. The PIA must document how the system will use information it collects about individuals and, unless it contains classified or sensitive information, it must be made available to the public. The PIA was intended to be a tool for agencies to protect personal information throughout a technology system's life cycle. The Office of Management and Budget (OMB) has commented: "*In general, PIAs are required to be performed and updated as necessary where a system change creates new privacy risks.*"[2]

The FCC is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below explore important privacy issues identified in the Act and in later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST). A longer discussion of the FCC's PIA policies can be found in Chapter 9 of the FCC's Privacy Act Manual (FCC Inst. 1113.1).

System owners, in collaboration with the Information System Security Officers (ISSOs) should complete the **Initial Privacy Assessment (IPA)** prior to filling out the PIA. The FCC Senior Agency Official for Privacy (SAOP) uses the IPA to determine whether a system will collect the kind of information that would make it subject to the requirements of Section 208, including a PIA. A PIA should not be completed until an IPA is completed and the SAOP makes a determination.

If you have any questions, please contact the Privacy Team at privacy@fcc.gov.

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[1] 44 U.S.C. § 3501 note.

[2] OMB Memorandum No. M-03-22 (Sep. 26, 2003), https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2003/m03_22.pdf.

1.2. Authority To Operate (ATO) Boundary Overview

For each IT system that resides within the ATO Boundary, please use the table below to provide the system name, a brief description of the what the system does, whether it contains Personally Identifiable Information (PII) and a brief description of the PII (if applicable), the applicable System of Records Notice, the legal authorities to collect and maintain the PII, and whether the PII is shared with other systems (internal or external).

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM Paycheck8
NAME OF BUREAU OMD/HR/PBSC
DOES THE SYSTEM CONTAIN PII? Yes. PII is retrievable and retrieved by unique identifier.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) Paycheck8 stores PII types relevant to tracking personnel time and attendance including name, date of birth, employment information, and other data elements.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPPLICABLE)? FCC OMD-28
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? 5 U.S.C. chapters 53, 55, 61, 63, and 65; Executive Order 9397, as amended (Nov. 20, 2008); Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193); 10 U.S.C. 1408; and 42 U.S.C. 659.
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? Yes.
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes. This system shares PII with the National Finance Center's (NFC) time and attendance systems and the FCC's Human Resources Management System (HRMS).

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM Human Resources Management System
NAME OF BUREAU OMD/HR/PBSC
DOES THE SYSTEM CONTAIN PII? Yes. PII is retrievable and retrieved by unique identifier.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) HRMS downloads and maintains contact and demographic information from the NFC mainframe.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPPLICABLE)? FCC OMD-28
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? 5 U.S.C. chapters 53, 55, 61, 63, and 65; Executive Order 9397, as amended (Nov. 20, 2008); Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193); 10 U.S.C. 1408; and 42 U.S.C. 659.
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? Yes.
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes. This system shares PII with the National Finance Center's (NFC) time and attendance systems and the FCC's Human Resources Management System (HRMS).

A. **Is this a new ATO Boundary or an existing ATO Boundary?**

☒ New Boundary

☐ Existing Boundary

B. If the ATO Boundary is/will consist of cloud-based computing system(s),[3] please check the box that best describes the service the FCC receives/will receive from the cloud computing provider:

☒ The FCC uses provider-supported application/s on the provider's cloud network (Software as a Service or SaaS): [**GDCI GSS - Paycheck8**]

☐ The FCC has deployed application/s on the provider's cloud network and the provider supports the applications (Platform as a Service or PaaS) [list applicable system(s)]

☒The FCC has deployed its own application/s on the cloud network and controls how these application/s are configured and operate (Infrastructure as a Service or IaaS): [**FCC ESI - HRMS**]

C. If the IT systems in the ATO Boundary are in the cloud, are they FedRAMP certified?

☐ Yes, all the IT systems are FedRAMP certified

☒ No, none, or only some, of the IT systems are FedRAMP certified

☐ Not applicable, ATO boundary is not Cloud based.

1.3 Collection of Data

A. Please explain why it is necessary to collect PII to carry out the purpose of each of the system(s) that maintain PII within this Boundary.

Paycheck8: The PII collected by Paycheck8 is necessary to connect time and attendance records with personnel and to record employee pay rates and status, including overtime, the use of leave, and work absences. The PII is also used to track workload and project activity for analysis and reporting purposes; for statistical reporting on leave and overtime use/usage patterns, number of employees teleworking, etc.; and to answer employee queries on leave, overtime, and pay.

HRMS: Necessary PII is downloaded to HRMS from NFC to initiate personnel actions such as temporary promotions, temporary appointments, conversion due dates, etc.

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[3] *See* NIST, *The NIST Definition of Cloud Computing*, Special Pub. No. 800-145 (Sep. 2011), https://csrc.nist.gov/publications/detail/sp/800-145/final.

B. **For each system within this Boundary, will this PII be collected from individuals themselves, or from third parties? If collected from individuals themselves, link to the Privacy Act Statement[4] for each system that is included with the online or paper form the system(s) use(s) to collect the PII.**

Paycheck8: Individuals, generally, directly provide the information to the Paycheck8 system. However, Human Resources Administrators might enter PII into Paycheck8 to correct data or enter missing data. Pacheck8 data is sent to NFC, who process the data and sends it back to Paycheck8.

The following Privacy Act Statement is provided to individuals at the point of collection:

Purpose(s): Records are used to prepare time and attendance records, to record employee pay rates and status, including overtime, the use of leave, and work absences; to track workload, project activity for analysis and reporting purposes; for statistical reporting on leave and overtime use/usage patterns, number of employees teleworking, etc.; and to answer employee queries on leave, overtime, and pay. Information from this system of records is provided to the National Finance Center (NFC) for the purpose of issuing payroll to FCC employees.

Routine Uses: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, these records or information contained therein may specifically be disclosed outside the FCC as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows: http://transition.fcc.gov/fccprivacypolicy.html apply to this system.

Disclosure is Voluntary: Providing the requested data is voluntary. However, failure to provide all the data requested may result in our inability to prepare time and attendance records for payroll purposes.

Rules of Use: Rules for collecting, using, retaining, and safeguarding this information are contained in FCC Privacy Act System Notice 6712-01, FCC/OMD entitled; "Time and Attendance Records."

HRMS: The Human Resources Management System downloads information from the NFC mainframe, it does not collect information directly from users.

C. **What steps is the FCC taking to limit the collection of PII to only that which is necessary?**

The FCC collects only the needed PII from the individuals to maintain personnel profiles and track personnel records.

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4 A Privacy Act Statement must inform individuals about (1) the authority to solicit information, (2) the principal purpose(s) for collecting the information, (3) the routine uses for disclosing the information, and (4) whether providing the information is mandatory or voluntary.

D. What steps will the FCC take to make sure this PII is accurate, complete, and up to date?

Paycheck8: The FCC verifies all PII from issued Government identification or other documents (Birth Certificates, Passports, Driver's License, etc). Employees are also required to ensure their information is correct.

HRMS: The FCC relies on the accuracy of the data maintained by NFC.

1.4 Use of the Data

A. Please explain the data flow, including whether the PII will be ingested from, or shared with, another system. Are internal connections reflected in the Cyber Security Asset Management tool (CSAM)? Are Information Sharing Agreements (ISAs) in CSAM for external connections?

Paycheck8: Employees or timekeepers enter time and attendance data into Paycheck8 at the end of each pay period. For timekeeper-based entry, the timekeeper enters time and attendance data into Paycheck8 for their assigned employees (e.g., in the employee's absence). Once time and attendance data are entered, the employee or timekeeper validates the data. During this step, Paycheck8 analyzes the employee's timesheet, and reports any errors or warnings. Error messages must be corrected before the employee's timesheet can be submitted to the employee's supervisor for certification. Once the timesheet has been validated, supervisors review the data entered by the employee and certify the data is correct.

There are internal connections to be reflected within CSAM. Paycheck8 provides HRMS with overtime data. Time and attendance data, which contain PII, will be shared and received with/from the NFC. An ISA has been executed by both organizations, and the connection and documentation are documented in the CSAM.

HRMS: Data are downloaded from the NFC mainframe into the HRMS.

B. Will the information be shared with third parties as part of the operations of the information system (e.g., through an application programming interface or "API")?

No

C. How long will the PII be retained and how will it be disposed of?

Information in the systems within this boundary is retained and destroyed in accordance with applicable FCC policies and procedures, as well as with the FCC records disposition schedule or General Records Schedules approved by the National Archives and Records Administration (NARA).

1.5 Data Security and Privacy

A. **What are the system's ratings for confidentiality, integrity, and availability?**

Confidentiality	☐ High	☒ Moderate	☐ Low
Integrity	☐ High	☒ Moderate	☐ Low
Availability	☐ High	☒ Moderate	☐ Low

B. **Discuss the physical, administrative, and technical controls in place to protect the data in the system.**

The FCC protects its information resources with a dynamic set of security measures. Some of these measures (e.g., network firewalls, physical security) protect the entire FCC enterprise, while other measures (e.g., user access restrictions, encryption) are applied to specific information systems. Following the risk-based policy established in the Federal Information Modernization Act (FISMA), the FCC applies more security measures (also known as security "controls") to information systems that present higher operational risks. Consistent with this policy, the FCC applies specific security controls to systems that collect and process PII. A comprehensive list of the security and privacy controls the FCC may apply to its information systems can be found in National Institute of Standards and Technology (NIST) Special Publication No. 800-53, Revision 5 [NIST].

C. **Does the system inherit privacy controls from an external provider? If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of the document.**

Paycheck8: Yes, Paycheck8 inherits privacy controls from GDCI GSS.

HRMS: Yes, HRMS inherits privacy controls from FCC ESI.

1.6 Access to the Information

A. **Which FCC employees and contractors will have access to the PII in this information system?**

Authorized FCC employees and contractors within the Human Resource Management department will have access to PII in the Paycheck8 SaaS application and in HRMS.

B. **Does this system leverage Enterprise Access Controls?**

Yes.