U.S. Department of the Interior
PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the DOI PIA Guide for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: Enterprise Human Resources Integration (EHRI) General Support System (GSS) Decommission PIA
Bureau/Office: Office of the Chief Information Officer
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Section 1. General System Information

    A. Is a full PIA required?
        ☒ Yes, information is collected from or maintained on
            ☐ Members of the general public
            ☒ Federal personnel and/or Federal contractors
            ☐ Volunteers
            ☐ All

        ☐ No: *Information is NOT collected, maintained, or used that is identifiable to the individual in this system. Only sections 1 and 5 of this form are required to be completed.*

B. What is the purpose of the system?

The Enterprise Human Resources Integration (EHRI) General Support System (GSS) is a general support system hosted at a Department of the Interior (DOI) data center.

The EHRI GSS provided network and communication support to the Office of Personnel Management (OPM) hosted applications, including the Enterprise Human Resources Integration Data Warehouse (EHRI DW) and its related minor applications, and the Electronic Official Personnel Folder (eOPF) application and its related two minor applications. The EHRI DW and eOPF support human resources management functions across the Federal Government. The EHRI DW is a data warehouse and repository for all executive branch employee data. The eOPF is an electronic system containing Federal employees' Official Personnel File, which may be accessed by Federal employees and human resources staff via the OPM website, and is also used by Federal agencies for the purpose of supporting the investigation process and saving agency resources.

OPM has migrated its systems and data hosted in the EHRI to an OPM-managed environment in Macon, Georgia, which is solely operated under OPM management. As a result of the successful migration of the EHRI GSS systems, data, and documentation to the new OPM environment and data center, the legacy DOI EHRI hosting infrastructure (servers, storage, and network devices) is no longer needed and is being decommissioned.

Software:

The OPM application software is outside the scope of this assessment as it is under the control of OPM and has been migrated to a new OPM hosted infrastructure. The EHRI OPM systems were successfully migrated to the OPM-managed and FISMA certified environment in 2017.

Hardware:

The DOI servers (in racks) have been moved to the tape library room and are being decommissioned based on direction from the EHRI System Owner. Excessing will follow DOI policy and procedures.

Servers identified in the "OPM eOPF and EHRI DW Equipment Inventory - Legacy Equipment for Decommissioning" spreadsheet have been decommissioned. Server hard drives will remain within the DOI Data Center organizational control until destroyed on site. The Data Center Manager has property custody of the servers until custody is transferred to a property officer within DOI's Office of Facilities and Services (OFAS), Property Management Office.

SAN (Storage Area Network) Storage in the DOI data centers will be professionally disposed of in accordance with National Institute of Standards and Technology (NIST)

standards. Storage devices will be excessed and the drives will be shredded in accordance with DOI policy or will receive sanitization, verification, and certification services.

All tapes will remain within the DOI Data Center's organizational control and will be shredded based on DOI policies and procedures. OPM has not provided any requirements for decommissioning and excessing of remaining equipment.

Documentation:

The EHRI DW and eOPF applications and data belong to OPM. The OPM applications, data and all documentation were migrated to an OPM managed facility in July 2017.

C. What is the legal authority?

The Chief Financial Officers Act (CFOs Act) of 1990, P.L. 101-576; the Federal Managers' Financial Integrity Act of 1982, P.L. 97-255 (31 U.S.C. 3512 et seq.); 31 U.S.C. Chapter 11, the Budget and Fiscal, Budget, and Program Information; the Office of Management and Budget Circular A-127, Policies and Standards for Financial Management Systems.

D. Why is this PIA being completed or modified?

☐ New Information System
☐ New Electronic Collection
☐ Existing Information System under Periodic Review
☐ Merging of Systems
☐ Significantly Modified Information System
☐ Conversion from Paper to Electronic Records
☒ Retiring or Decommissioning a System
☐ Other: *Describe*

E. Is this information system registered in CSAM?
The completed PIA, associated system of records notice(s), and any other supporting artifacts must be entered into the CSAM system for each registered system or application.

☒ Yes: *Enter the UII Code and the System Security Plan (SSP) Name*

UII Code: 010-00-01-07-02-1219-00; EHRI GSS SSP of September 7, 2016.

☐ No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII *(Yes/No)*	Describe *If Yes, provide a description.*
EHRI DataWarehouse (DW)	The EHRI Data Warehouse system is a major application owned by OPM that stores employee records for Federal employees and contains sub-applications such as Central Employee Record (CER) and Business Intelligence Reporting (BI), Statistical Datamart (SDM) and Records System Modernization (RSM) applications.	Yes	Stores PII in the form of employee records. OPM completed a PIA for this system.
Electronic Official Personnel Folder (eOPF)	The eOPF major application allows Federal government employees to access their official personnel folders online. The eOPF has the minor applications Electronic Data Management System (EDMS) and ePerformance.	Yes	Federal employee official personnel records. OPM completed a PIA for this system.

DOI's legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

G. **Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?**

☐ Yes: *List Privacy Act SORN Identifier(s)*
☒ No

H. **Does this information system or electronic collection require an OMB Control Number?**

☐ Yes: *Describe*
☒ No

Section 2. Summary of System Data

A. **What PII will be collected? Indicate all that apply.**

☒ Other: *Specify the PII collected.*

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

B. **What is the source for the PII collected? Indicate all that apply.**

☐ Individual
☐ Federal agency
☐ Tribal agency
☐ Local agency
☐ DOI records
☐ Third party source
☐ State agency
☒ Other: *Describe*

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

C. **How will the information be collected? Indicate all that apply.**

☐ Paper Format
☐ Email
☐ Face-to-Face Contact
☐ Web site

☐ Fax
☐ Telephone Interview
☐ Information Shared Between Systems
☒ Other: *Describe*

The DOI legacy EHRI infrastructure has been decommissioned. Information is not being collected. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

D. What is the intended use of the PII collected?

DOI's legacy EHRI infrastructure is decommissioned, the data, system and software are migrated to OPM managed site.   PII is no longer hosted in the EHRI. Please see the OPM privacy impact assessments for the applications owned and managed by OPM for information on how data is collected and used by OPM.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

☐ Within the Bureau/Office: *Describe the bureau/office and how the data will be used.*

☐ Other Bureaus/Offices: *Describe the bureau/office and how the data will be used.*

☒ Other Federal Agencies: *Describe the federal agency and how the data will be used.*

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment. Individuals may view OPM privacy impact assessments for the OPM-owned and managed applications and related system of records notices for information on how data is managed and shared.

☐ Tribal, State or Local Agencies: *Describe the Tribal, state or local agencies and how the data will be used.*

☐ Contractor: *Describe the contractor and how the data will be used.*

☐ Other Third Party Sources: *Describe the third party source and how the data will be used.*

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

☐ Yes: *Describe the method by which individuals can decline to provide information or how individuals consent to specific uses.*

☐ No: *State the reason why individuals cannot object or why individuals cannot give or withhold their consent.*

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

☐ Privacy Act Statement: *Describe each applicable format.*

☐ Privacy Notice: *Describe each applicable format.*

☐ Other: *Describe each applicable format.*

☒ None

H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment.

I. Will reports be produced on individuals?

☐ Yes: *What will be the use of these reports? Who will have access to them?*

☒ No

Section 3. Attributes of System Data

A. How will data collected from sources other than DOI records be verified for accuracy?

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment.

B. How will data be checked for completeness?

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being collected or hosted in this legacy environment.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data belong to OPM and were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment.

Server hard drives will remain within the DOI Data Center organizational control until destroyed on site. SAN storage in the DOI data centers will be professionally disposed of in accordance with NIST guidelines. Storage devices will be excessed and drives will be shredded in accordance with DOI policy or will receive sanitization, verification, and certification services. All tapes will remain within the DOI Data Center's organizational control and will be shredded based on DOI policies and procedures. Approved methods include shredding or pulping paper records, and degaussing or erasing for electronic records, in accordance with NARA Guidelines and 384 Departmental Manual 1.

F. Briefly describe privacy risks and how information handling practices at each stage of the "information lifecycle" (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

The DOI legacy EHRI infrastructure has been decommissioned. The OPM application software and data were migrated to an OPM managed site. As a result, PII is no longer being hosted in this legacy environment. The hosted applications and data belong to

Enterprise Human Resources Integration (EHRI) Decommission
Privacy Impact Assessment

OPM, and OPM conducted privacy impact assessments to assess the risks for the OPM owned applications.

There is a limited privacy risk for the decommissioning of the DOI legacy EHRI infrastructure related to potential unauthorized access or mishandling of the residual data that remains in the legacy EHRI GSS before it can be destroyed. DOI will shred both the SAN storage and the backup tapes in accordance with DOI policy to mitigate this risk. DOI has implemented adequate physical, administrative and logical controls to protect the devices, equipment and any residual data from unintended or unauthorized access. Prior to excessing, the residual data will be located on the SAN devices and tape backups under the control of DOI, and will be located in secured DOI controlled facilities that are monitored 24 hours a day and are limited to authorized personnel with PIV card and password.

Section 4. PIA Risk Review

A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

☐ Yes: *Explanation*
☒ No

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

☐ Yes: *Explain what risks are introduced by this data aggregation and how these risks will be mitigated.*

☒ No

C. Will the new data be placed in the individual's record?

☐ Yes: *Explanation*
☒ No

D. Can the system make determinations about individuals that would not be possible without the new data?

☐ Yes: *Explanation*
☒ No

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E. How will the new data be verified for relevance and accuracy?

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site.

F. Are the data or the processes being consolidated?

☐ Yes, data is being consolidated. *Describe the controls that are in place to protect the data from unauthorized access or use.*

☐ Yes, processes are being consolidated. *Describe the controls that are in place to protect the data from unauthorized access or use.*

☒ No, data or processes are not being consolidated.

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

☐ Users
☐ Contractors
☐ Developers
☐ System Administrator
☒ Other: *Describe*

The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site. PII is no longer hosted in the EHRI GSS.

H. How is user access to data determined? Will users have access to all data or will access be restricted?

The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site.   PII is no longer hosted in the EHRI GSS. Only authorized DOI personnel have access to the equipment and residual data pending destruction.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

☒ Yes. *Were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?*

Privacy clauses are included in the contract.

☐ No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

☐ Yes. *Explanation*
☒ No

K. Will this system provide the capability to identify, locate and monitor individuals?

☐ Yes. *Explanation*
☒ No

L. What kinds of information are collected as a function of the monitoring of individuals?

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site.

M. What controls will be used to prevent unauthorized monitoring?

Not applicable. The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

☒ Security Guards
☐ Key Guards
☐ Locked File Cabinets
☒ Secured Facility
☒ Closed Circuit Television
☐ Cipher Locks
☒ Identification Badges
☐ Safes
☐ Combination Locks
☒ Locked Offices
☒ Other. *Describe*

The DOI legacy EHRI infrastructure has been decommissioned, and the OPM software applications and data were migrated to an OPM managed site. DOI's legacy EHRI infrastructure is now decommissioned, the data, system and software are migrated to OPM managed site. The SAN devices and tape backups are under the

control of DOI until they are destroyed, and are located in a secured DOI controlled facility that is monitored 24 hours a day and requires a PIV card and password to enter.

(2) Technical Controls. Indicate all that apply.

☒ Password
☒ Firewall
☒ Encryption
☒ User Identification
☐ Biometrics
☒ Intrusion Detection System (IDS)
☒ Virtual Private Network (VPN)
☒ Public Key Infrastructure (PKI) Certificates
☒ Personal Identity Verification (PIV) Card
☐ Other. *Describe*

(3) Administrative Controls. Indicate all that apply.

☒ Periodic Security Audits
☒ Backups Secured Off-site
☒ Rules of Behavior
☒ Role-Based Training
☒ Regular Monitoring of Users' Security Practices
☒ Methods to Ensure Only Authorized Personnel Have Access to PII
☒ Encryption of Backups Containing Sensitive Data
☒ Mandatory Security, Privacy and Records Management Training
☐ Other. *Describe*

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The Hosting Services Branch Chief, Office of the Secretary, serves as the EHRI Information System Owner and the official responsible for oversight and management of the EHRI security controls. The Information System Owner is responsible for ensuring adequate safeguards are implemented to protect privacy in compliance with Federal laws and policies for the equipment and any residual data retired and disposed of in EHRI. The DOI legacy EHRI infrastructure has been decommissioned, and the OPM systems and data were migrated to an OPM managed site.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The EHRI Information System Owner is responsible for oversight and management of the EHRI security and privacy controls, and for ensuring to the greatest possible extent that access to data has been granted in a secure and auditable manner, and the decommissioned equipment and any residual data is destroyed in a secure and approved manner in accordance with DOI policy. The Information System Owner is also responsible for ensuring that any compromise, unauthorized access or use of data is reported to DOI-CIRC within 1-hour of discovery in accordance with Federal policy and established DOI procedures.