

Federal Communications Commission
Office of the Managing Director



**Privacy Impact Assessment¹ (PIA) for the
Pay, Leave, and Garnishment Records**

June 23, 2009

FCC Bureau/Office: Office of Managing Director (OMD)

Division: Associate Managing Director, Human Resource Management Division (AMD-HRM)

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The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

¹ This questionnaire is used to analyze the impacts on the privacy and security of the personally identifiable information (PII) that is being maintained in these records and files.

Having established through the **Privacy Threshold Analysis (PTA)** that this information system contains information about individuals, *e.g.*, personally identifiable information (PII), it is important that when the FCC makes changes to such an information system, the FCC then analyzes:

- (a) What changes are being made to the information that the system presently collects and maintains; and/or
- (b) What new information will be collected and maintained to determine the continuing impact(s) on the privacy of the individuals.

The Privacy Impact Assessment template's purpose is to help the bureau/office to evaluate the changes in the information in the system and to make the appropriate determination(s) about how to treat this information, as required by the Privacy Act's regulations.

Section 1.0 Information System's Contents:

1.1 Status of the Information System:

- New information system—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: April 2009

If this system is being revised—what will be done with the newly derived information:

- Placed in existing information system—Implementation Date: April 2009
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The Associate Managing Director, Human Resources Management Division (AMD-HRM) in the Office of Managing Director (OMD) has determined that much of the information in the Garnishment and Levy of Wages information system duplicates information in the Pay, Leave, and Garnishment Records information system. Therefore, the FCC is merging the Garnishment and Levy of Wages information system into the Pay, Leave, and Garnishment Records information system. The combined information system will be called the Pay, Leave, and Garnishment Records information system. The FCC will cancel the Garnishment and Levy of Wages information system.

The merged information system will include all records and data from both information system, including the personally identifiable information (PII) that will be covered by the merged system of records notice (SORN), which is titled FCC/OMD-14, "Pay, Leave, and Garnishment Records."

HRM has also upgraded parts of this combined information system and added a routine use, "breach notification," as required by OMB Memorandum M-07-16 (May 22, 2007).

1.2 Has a Privacy Threshold Analysis (PTA) been done?

- Yes
Date:
- No

If a Privacy Threshold Analysis has not been done, please explain why not:

The merged system of records notice (SORN) FCC/OMD-14, "Pay, Leave, and Garnishment Records" that covers the personally identifiable information (PII) in the Pay, Leave, and Garnishment information system pre-dates the requirements in OMD Memorandum M-03-22 (September 22, 2003).

If the Privacy Threshold Analysis has been completed, please skip to Question 1.15

- 1.3 Has this information system, which contains information about individuals, *e.g.*, personally identifiable information (PII), existed under another name, *e.g.*, has the name been changed or modified?

Yes
 No

If yes, please explain your response:

The merged Pay, Leave, and Garnishment Records information system includes the databases that contain information with which the FCC performs a variety of payroll, wage collection, garnishment and levy orders, and statistical activities for the Commission and FCC employees.

Neither of the two systems of records existed under another name, nor was the name of either of them changed or modified.

The two SORNs were published in the *Federal Register* on April 5, 2006 as the FCC/OMD-14, "Pay, Leave, and Garnishment Records" and FCC/OMD-21, "Garnishment and Levy of Wages," respectively.

- 1.4 Has this information system undergone a "substantive change" in the system's format or operating system?

Yes
 No

If yes, please explain your response:

The HRM staff has made only minor updates to the operating system, *etc.*, for the merged Pay, Leave, and Garnishment information system.

If there have been no such changes, please skip to Question 1.6.

- 1.5 Has the medium in which the information system stores the records or data in the system changed from paper files to electronic medium (computer database); or from one electronic information system to another, *i.e.*, from one database, operating system, or software program, *etc.*?

Yes
 No

If yes, please explain your response:

- 1.6 Has this information system operated as part of another information system or was it linked to another information system:

Yes
 No

If yes, please explain your response:

The Pay, Leave, and Garnishment information system has links to several other FCC or non-FCC information systems, including the USDA's National Finance Center Payroll/Personnel System), Internal Revenue Service (IRS), Department of the Treasury (U.S. Savings Bonds), and the National Treasury Employees Union (NTEU) (union payroll allocations and deductions).

If the information system is not part of, nor linked to another information system, please skip to Question 1.8

1.7 If this information system has links to another information system, was it operated by another bureau/office or transferred from another Federal agency to the FCC?

- Yes
- No

Please explain your response:

The Human Resources Management division of the Office of Managing Director has always managed the operations of these two information systems, and will continue to have managerial oversight for the merged Pay, Leave, and Garnishment Records information system. Both the Pay, Leave, and Garnishment Records and the Garnishment of Wages information systems were always FCC information systems--neither was ever operated by or transferred from another Federal agency.

1.8 What information is the system collecting, analyzing, managing, storing, transferring, *etc.*:

Information about FCC Employees:

- No FCC employee information
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)

- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license
- Bank account(s)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: The combined information system also includes garnishment of levy orders served upon the FCC for implementation, correspondence, and memoranda by a court of competent jurisdiction or other government entity authorized to issues such an order.

Information about FCC Contractors:

- No FCC contractor information
- Contractor's name
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- U.S. Citizenship
- Non-U.S. Citizenship
- Race/Ethnicity
- Gender
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)

- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

Information about FCC Volunteers, Visitors, Customers, and other Individuals:

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN:
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data

- Communications protected by legal privileges
- Digital signature
- Other information:

Information about Business Customers and others (usually not considered “personal information”):

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Other information:

1.9 What are the sources for the information that you are collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households:
- Non-personal information from businesses and other for-profit entities:
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources: United States Department of Agriculture (USDA), National Finance Center's (NFC) Payroll/Personnel System, Internal Revenue Service (IRS), state income tax/revenue agencies, and National Treasury Employees Union (NTEU), *etc.*

1.10 Will the information system obtain, use, store, analyze, *etc.* information about individuals *e.g.*, personally identifiable information (PII), from other information systems, including both FCC and non-FCC information systems?

- Yes
- No

Please explain your response:

The Pay, Leave, and Garnishment Records information system, including the personally identifiable information covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, has links to other Federal agencies, including the USDA NFC Payroll/Personnel System, Internal Revenue Service (IRS), Department of the Treasury (U.S. Savings Bonds), and Combined Federal Campaign (CFC); State income tax agencies; and the National Treasury Employees Union (NTEU), *etc.*, for which the FCC's HRM collects funds and fees pertaining to the payroll allocations and obligations and wage garnishment and levy orders for FCC employees.

If the information system does not use any PII from other information systems, including both FCC and non-FCC information systems, please skip to Question 1.15.

1.11 If the information system uses information about individuals from other information systems, what information will be used?

- FCC information system and information system name(s):
- Non-FCC information system and information system name(s): Internal Revenue Service (IRS), Department of the Treasury (U.S. Savings Bonds), and the National Treasury Employees Union (NTEU), USDA NFC Payroll/Personnel System, and state income tax/revenue agencies.
- FCC employee's name:
- (non-FCC employee) individual's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- Other Federal Government employee ID information, *i.e.*, badge number, *etc.*
- SSN:
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scan/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information:
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license

- Bank account(s)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military records
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Other information:

Information about Business Customers and others (usually not considered “personal information”):

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

1.12 Will this information system derive new information, records, or data, or create previously unavailable information, records, or data, through aggregation or consolidation from the information that will now be collected via this link to the other system, including information, records, or data, that is being shared or transferred from the other information system(s)?

- Yes
- No

Please explain your response:

- 1.13 Can the information, whether it is: (a) in the information system, (b) in a linked information system, and/or (c) transferred from another system, be retrieved by a name or a “unique identifier” linked to an individual, *e.g.*, SSN, name, home telephone number, fingerprint, voice print, *etc.*?

Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system may use the FCC employee's name, social security number, *etc.*, to match records between the FCC and other Federal agencies, *i.e.*, U.S. Department of Treasury, U.S. Department of Agriculture (National Finance Center), Internal Revenue Service (IRS), and Combined Federal Campaign (CFC); state income tax/revenue agencies; and other organizations, *i.e.*, National Treasury Employees Union (NTEU), *etc.*, for various payroll deductions, *etc.*

- 1.14 Will the new information include personal information about individuals, *e.g.*, personally identifiable information (PII), be included in the individual's records, or be used to make a determination about an individual?

Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system may use information that it collections and/or transmits to and from other Federal agencies and other organizations, *i.e.*, NTEU, as required by Federal regulations and each FCC employee's voluntary payroll deductions, wage garnishment and levy orders, *etc.*

- 1.15 Under the *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, Federal agencies are required to have a System of Records Notice (SORN) for an information system like this one, which contains information about individuals, *e.g.*, “personally identifiable information” (PII).

A System of Records Notice (SORN) is a description of how the information system will collect, maintain, store, and use the personally identifiable information (PII).

Is there a SORN that already covers this PII in this information system?

Yes
 No

If yes, what is this System of Records Notice (SORN): The two systems of records notices (SORNs), FCC/OMD-14, “Pay, Leave, and Garnishment Records,” and FCC/OMD-21 “Garnishment and Levy of Wages,” were each published in the *Federal Register* on April 5, 2006.

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17257 and 17266 respectively.

The new, combined SORN, FCC/OMD-14, "Pay, Leave, and Garnishment Records," will be published in *Federal Register* when the FCC does the update of its SORNs inventory.

If a SORN already covers this PII, please skip to **Section 2.0 System of Records Notice (SORN) Update** to address any changes to this SORN.

If a system of records notice (SORN) does not presently cover the information about individuals in this system, then it is necessary to determine whether a new FCC system of records notice must be created for the information.

- 1.16 If this information system is not covered by a system of records notice (SORN), does the information system exist by itself, or does it now, or did it previously exist as a component or subset of another SORN?

- Yes
 No

If yes, please explain what has occurred:

What is the System of Records Notice (SORN) of which it is currently or previously a component or subset:

Please also provide the citation that was published in the *Federal Register* for the SORN:

- 1.17 What are the purposes or functions that make it necessary to create a new a system of records notice (SORN) for this information system, *e.g.*, why is the information being collected?

- 1.18 Where is this information for the system of records notice (SORN) located?

- 1.19 Is the use of the information both relevant and necessary to the purposes for which the information system is designed, *e.g.*, is the SORN only collecting and using information for the specific purposes for which the SORN was designed so that there is no “extraneous” information included in the database(s) or paper files?

- Yes
 No

Please explain your response:

If the use of this information is both relevant and necessary to the processes for this information system is designed, please skip to Question 1.21.

- 1.20 If not, why or for what reasons is the information being collected?

- 1.21 Is the information covered under a Security Classification as determined by the FCC Security Officer?

- Yes
 No

Please explain your response:

1.22 What is the legal authority that authorizes the development of the information system and the information/data collection?

1.23 In what instances would the information system's administrator/manager/developer permit disclosure to those groups outside the FCC for whom the information was not initially intended.

Such disclosures, which are referred to as "Routine Uses,"² are those instances that permit the FCC to disclose information from a SORN to specific "third parties." These disclosures may be for the following reasons:

(check all that are applicable)

- Adjudication and litigation:
- Committee communications and reporting:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:

- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Information Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations (NTEU):
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA, *etc.*:
- Breach of Federal data:
- Others "third party" disclosures:

1.24 Will the information be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

1.25 What are the policies for the maintenance and secure storage of the information?

² Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, "routine uses"; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected.

- 1.26 How is information in this system retrieved?
- 1.27 What policies and/or guidelines are in place on how long the bureau/office will retain the information?
- 1.28 Once the information is obsolete or out-of-date, what policies and procedures have the system's managers/owners established for the destruction/purging of the data?
- 1.29 Have the records retention and disposition schedule(s) been issued or approved by the National Archives and Records Administration (NARA)?

- Yes
 No

Please explain your response:

If a NARA records retention and disposition schedule has been approved for this System of Records Notice (SORN), please skip to **Section 2.0 System of Records Notice (SORN) Update:**

- 1.30 If there is no NARA approved records retention and disposal schedule, has there been any coordination with the Performance Evaluation and Records Management Branch (PERM) or the Records Officer?

- Yes
 No

Please explain your response:

If this is a new System of Records Notice (SORN), please skip to **Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:**

Section 2.0 System of Records Notice (SORN) Update:

If a System of Records Notice (SORN) currently covers the information, please provide information to update and/or revise the SORN:

- 2.1 Have there been any changes to the Security Classification for the information covered by the system of records notice (SORN) from what was originally determined by the FCC Security Officer?

- Yes
 No

Please explain your response:

The FCC's Security Operations Center (SOC) has not assigned a security classification to the Pay, Leave, and Garnishment Records information system, and to the personally identifiable

information (PII) that it collects, uses, and maintains that is covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN.

2.2 Have there been any changes to the location of the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

The information, including the personally identifiable information (PII) that is covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, is located in the Associate Managing Director, Human Resource Management (AMD-HRM) in the Office of Managing Director (OMD-HRM), 445 12th Street, S.W., Washington, DC 20554.

2.3 Have there been any changes to the categories of individuals covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

The categories of individuals that are covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” ” SORN, included current and former employees of the Federal Communications Commission (FCC).

2.4 Have there been any changes to the categories of records, *e.g.*, types of information (or records) that the system of records notice (SORN) collects, maintains, and uses?

- Yes
- No

Please explain your response:

The categories of records, including the personally identifiable information (PII) that is covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, are as follows:

- (1) to administer the Pay, Leave, and Garnishment requirements for FCC employees: the records include the FCC employee's name, address, home telephone number, and Social Security Number (SSN);
- (2) to administer garnishment and levy orders: the records include orders served upon the FCC for implementation, correspondence, and memorandum issued by a court of competent jurisdiction or by another government entity authorized to issue such an order for a FCC employee subject thereto.

2.5 Have there been any changes to the legal authority under which the FCC collects and maintains the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

The legal authorities for maintenance of the personally identifiable information (PII) covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, are as follows:

- (1) to administer the Pay, Leave, and Garnishment records: 44 U.S.C. 3101 and 3102; 5 U.S.C. 6331-6340; Federal Employees Leave Sharing Act of 1988 and Amendments of 1993 (P.L. 103-103 and P.L. 100-566); Executive Order 9397, November 22, 1943; and Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193); and
- (2) to administer the garnishment and levy orders: 5 U.S.C. 5520a, 10 U.S.C. 1408, and 42 U.S.C. 659.

2.6 Have there been any changes to the purposes for collecting, maintaining, and using the information covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

The purposes for collecting maintaining, and using the information in the Pay, Leave, and Garnishment Records information system, including the PII and other records covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, are as follows:

- (1) To authorize payroll deductions for allotments, savings bonds, charitable contributions, and union dues, etc;
- (2) To collect indebtedness for overpayment of salary and unpaid Internal Revenue Service (IRS) taxes;
- (3) To pay income tax obligations to the Internal Revenue Service (IRS);
- (4) To authorize the U.S. Department of the Treasury to issue salary checks;
- (5) To report gross wages and compensation information for unemployment compensation;
- (6) To pay any uncollected compensation due to the beneficiaries of a deceased employee;
- (7) To determine the eligibility for and/or to authorize donations for the leave transfer program;
- (8) To produce summary descriptive statistics and analytical studies in support of the FCC's Human Resources Management (HRM) functions;
- (9) To respond to general requests for statistical information (without disclosing any personally identifiable information (PII)) under the Freedom of Information Act (FOIA); and
- (10) To locate specific individuals for Human Resource Management (HRM) functions; and
- (11) To direct the FCC's implementation of garnishment and levy orders served upon the Commission for implementation, correspondence, and memoranda, issued by a court of competent jurisdiction or by another government entity authorized to issue such an order for a Commission employee subject thereto.

2.7 Have there been any changes to the “Routine Uses,”³ under which disclosures are permitted to “third parties” as noted in the system of records notice (SORN)?

- Yes
- No

Please check all Routine Uses that apply and provide any explanation as required:

- Adjudication and litigation:
- Committee communications and reporting:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data: OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above:

2.8 Have there been any changes as to whether the FCC will permit the information covered by the system of records notice (SORN) can be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

Information in the Pay, Leave, and Garnishment Records information system, including the personally identifiable information (PII) covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, is not disclosed to any consumer reporting agencies.

2.9 Have there been any changes to the policies and/or guidelines for the storage and maintenance of the information covered by this system of records notice (SORN)?

- Yes
- No

Please explain your response:

The information in the Pay, Leave, and Garnishment information system, including the PII covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, consists of:

³ Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, “routine uses”; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected.

- (1) Paper documents, records, and related materials that are stored in file folders in file cabinets;
and
- (2) Electronic data and records that are stored in the FCC's computer network databases.

2.10 Have there been any changes to how the information covered by the system of records notice (SORN) is retrieved or otherwise accessed?

- Yes
- No

Please explain your response:

The information in the Pay, Leave, and Garnishment Records information system, including the PII covered by the FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN is retrieved by the individual's name and/or Social Security Number (SSN).

2.11 Have there been any changes to the safeguards that the system manager has in place to protect unauthorized access to the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

Access to the information, records, and data in the Pay, Leave, and Garnishment Records information system, including the personally identifiable information (PII) that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, is restricted to authorized supervisors and employees and contractors in the Payroll and Benefits Service Center in OMD-HRM.

The paper documents, files, and related materials are stored in filing cabinets that are locked at the close of the business day.

The electronic records and data are stored in the FCC's computer network databases, which are protected by passwords and other security measures.

Please note that you must also provide an update of the current protections, safeguard, and other security measures that are in place in this SORN in **Section 5.0 Safety and Security Requirements:**

2.12 Have there been any changes to the records retention and disposition schedule for the information covered by the system of records notice (SORN)? If so, has the system manager worked with the Performance Evaluation and Records Management (PERM) staff to insure that this revised schedule been approved by the National Archives and Records Administration (NARA)?

- Yes
- No

Please explain your response:

The information in the paper documents, records, files, and related materials and electronic records and data housed on the FCC computer network databases that is contained in the Pay, Leave, and Garnishment Records information system, including the personally identifiable information (PII) covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, is maintained and disposed of in accordance with General Records Schedule 2 (GRS 2) issued by the National Archives and Records Administration (NARA).

Under GRS 2, records are retained for various periods. Generally, the records are kept from 3 to 56 years, depending on the type of record.

However, for information that relates to a garnishment or levy order, the information is destroyed 3 years after the termination of the garnishment or levy order.

Disposal of the paper documents, files, and records are disposal is by shredding. Electronic records are destroyed physically (electronic storage media) or by electronic erasure.

Individuals may request a copy of the (document) disposition instructions from the FCC Privacy Act Officer or access GRS 2 directly at:

<http://www.archives.gov/records-mgmt/ardor/grs02.html>.

Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:

3.1 Who will develop the information system(s) covered by this system of records notice (SORN)?

- Developed wholly by FCC staff employees:
- Developed wholly by FCC contractors:
- Developed jointly by FCC employees and contractors:
- Developed offsite primarily by non-FCC staff:
- COTS (commercial-off-the-shelf-software) package:
- Other development, management, and deployment/sharing information arrangements:

3.2 Where will the information system be hosted?

- FCC Headquarters
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago
- Other information:

3.3 Who will be the primary manager(s) of the information system who will be responsible for assuring access to, proper use of, and protecting the security and integrity of the information? (Check all that apply and provide a brief explanation)

- FCC staff in this bureau/office exclusively: The supervisors and staff in HRM's Payroll and Benefits Service Center have responsibility for access and proper use of the information in the Pay, Leave, and Garnishment Records information system.
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers:
- Contractors:
- Other information system developers, *etc*:

3.4 What are the FCC's policies and procedures that the information system administrators and managers use to determine who gets access to the information in the system's files and/or database(s)?

Access to the information in the Pay, Leave, and Garnishment Records information system is restricted to the HRM staff in the Payroll and Benefits Service Center.

- 3.5 How much access will users have to data in the information system(s)?
- Access to all data:
 - Restricted access to data, as determined by the information system manager, administrator, and/or developer: FCC employees and contractors in OMD-HRM may be granted access on a "need-to-know" basis as dictated by their job duties and responsibilities.
 - Other access policy:

- 3.6 Based on the Commission policies and procedures, which user group(s) may have access to the information at the FCC:

(Check all that apply and provide a brief explanation)

- Information system managers: Supervisors and staff and contactors in HRM's Payroll and Benefits Service Center.
- Information system administrators:
- Information system developers:
- FCC staff in this bureau/office: FCC employees and contractors in HRM are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices: FCC employees are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices in FCC field offices:
- Contractors: Contractors at the FCC are granted access on a "need to know" basis.
- Other Federal agencies:
- State and/or local agencies:
- Businesses, institutions, and other groups:
- International agencies:
- Individuals/general public:
- Other groups:

- 3.7 If contractors are part of the staff in the FCC who collect, maintain, and access the information, does the IT supervisory staff ensure that contractors adhere fully to the Privacy Act provisions, as required under subsection (m) of the Privacy Act, as amended, 5 U.S.C. 552a(m)?

- Yes
- No

Please explain your response:

The supervisory staff in the Information Technology Center, Associate Managing Director (AMD-ITC) conducts periodic privacy training for the IT contractors who handle the PII contained in the Pay, Leave, and Garnishment Records information system that is stored on the FCC's computer network databases.

- 3.8 Do any Section M contract(s) associated with the information system covered by this system of records notice (SORN) include the required FAR clauses (FAR 52.224-1 and 52.224-2)?

- Yes
- No

Please explain your response:

The HRM contracts covering contractors who work with the information in the Pay, Leave, and Garnishment Records information system, including the personally identifiable information covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, include the FAR clauses.

- 3.9 Does the information system covered by this system of records notice (SORN) transmit/share personal information, *e.g.*, personally identifiable information (PII), between the FCC information technology (ITC) network(s) and a public or other non-FCC IT network(s), which are not covered by this Privacy Impact Assessment?

Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system, including the PII covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, has links to other Federal agencies, *i.e.*, Internal Revenue System (IRS), USDA payroll system (National Finance Center), Department of the Treasury (U.S. Savings Bonds), and Combined Federal Campaign (CFC); state income tax agencies; and the National Treasury Employees Union (NTEU), *etc.*

If there is no information sharing or transmission, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

- 3.10 If the information system covered by this system of records noticed (SORN) transmits/shares personal information between the FCC network and a public or other non-FCC network, which is not covered by this Privacy Impact Assessment, what information is shared/transmitted/disclosed and for what purposes?

The Pay, Leave, and Garnishment Records information system may transmit miscellaneous personnel/payroll records to/from NFC and the USDA for HRM.

- 3.11 If there is such transmission/sharing of personal information, how is the information secured for transmission—what security measures are used to prevent unauthorized access during transmission, *i.e.*, encryption, *etc.*?

Each agency that participates in the information transmission/sharing processes, including the FCC, NFC, USDA, IRS, and state revenue/taxation agencies, *etc.* is responsible for its own security protocol/mechanisms.

- 3.12 If there is sharing or transmission to other information systems, with what other non-FCC organizations, groups, and individuals will the information be shared?
(Check all that apply and provide a brief explanation)

Other Federal agencies: Internal Revenue Service, U.S. Department of Treasury, and U.S. Department of Agriculture's National Finance Center (NFC).
 State, local, or other government agencies: State income tax/revenue agencies.
 Businesses:
 Institutions: Combined Federal Campaign charities.
 Individuals:
 Other groups: National Treasury Employees Union (NTEU).

If there is no "matching agreement," *e.g.*, *Memorandum of Understand (MOU)*, *etc.*, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

- 3.13 What kind of “matching agreement,” *e.g.*, *Memorandum of Understanding (MOU)*, *etc.*, as defined by 5 U.S.C. 552a(u) of the Privacy Act, as amended, is there to cover the information sharing and/or transferal with the external organizations?

The FCC has one or more MOUs with the NFC, IRS, USDA, and state revenue/taxation agencies, *etc.*, to cover the information sharing and/or transmission processes.

- 3.14 Is this a new or a renewed matching agreement?

- New matching agreement
 Renewed matching agreement

Please explain your response:

The FCC's MOUs with the NFC, IRS, USDA, and state revenue/taxation agencies, *etc.*, that cover the information sharing and/or transmission processes are long-standing agreements.

- 3.15 Has the matching agreement been reviewed and approved (or renewed) by the FCC’s Data Integrity Board, which has administrative oversight for all FCC matching agreements?

- Yes
If yes, on what date was the agreement approved:
 No

Please explain your response:

- 3.16 How is the information that is covered by this system of records notice (SORN) transmitted or disclosed to the external organization(s) under the *MOU* or other “matching agreement?”

The information that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, is transmitted electronically via secured transmission mechanisms, *i.e.*, data encryption, *etc.*, that are designed to protect the information from any security breaches.

- 3.17 How is the shared information secured by the recipient under the *MOU*, or other “matching agreement?”

The MOUs that cover the information sharing arrangements that the FCC and the other federal and state agencies, *etc.*, use include various security protocols and other arrangements designed to protect the information that is being transmitted/shared between the FCC and the other participants.

Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:

OMB regulations require Federal agencies to insure that the information/data that they collect and use meets the highest possible level of quality and integrity. It is important, therefore, that the information the Commission’s information systems use meets the “benchmark standards” established for the information.

- 4.1 How will the information that is collected from FCC sources, including FCC employees and contractors, be checked for accuracy and adherence to the Data Quality guidelines? (Please check all that apply)

- Information is processed and maintained only for the purposes for which it is collected.
 Information is reliable for its intended use(s).
 Information is accurate.

- Information is complete.
- Information is current.
- Not applicable:

Please explain any exceptions or clarifications:

The information contained in the Pay, Leave, and Garnishment Records information system, including the personally identifiable information (PII) covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, must comply with the Data Quality guidelines. FCC employees must also verify that the information they provide is accurate and up-to-date.

If the Data Quality Guidelines do not apply to the information in this information system, please skip to **Section 5.0 Safety and Security Requirements:**

4.2 Is any information collected from non-FCC sources; if so, how will the information sources be checked for accuracy and adherence to the Data Quality guidelines?
(Please check all that apply and provide an explanation)

- Yes, information is collected from non-FCC sources: Internal Revenue Service, U.S. Department of Agriculture, U.S. Treasury, National Treasury Employees Union, and State income tax agencies, *etc.*
- Information is processed and maintained only for the purposes for which it is collected:

- Information is reliable for its intended use(s):
- Information is accurate:
- Information is complete:
- Information is current:

No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

The information that the FCC obtains from other federal agencies must meet these same federal Data Quality guidelines as the FCC. The FCC assumes that the state agencies also have similar data quality requirements that are designed to insure that the information that they transmit/share with the FCC is reliable, accurate, complete, and current.

If the information that is covered by this system of records notice (SORN) is not being aggregated or consolidated, please skip to Question 4.5.

4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to insure that the information is relevant, accurate, and complete?

4.4. What policies and procedures do the information system’s administrators and managers use to insure that the information adheres to the Data Quality guidelines both when the information is obtained from its sources and when the information is aggregated or consolidated for the use by the bureaus and offices?

- 4.5 How often are the policies and procedures checked routinely—what type of annual verification schedule has been established to insure that the information that is covered by this system of records notice adheres to the Data Quality guidelines?

The HRM staff does periodic checks of the information on that is stored, maintained, and used in the Pay, Leave, and Garnishment Records information system, including the PII covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, to insure that it adheres to the Data Quality guidelines.

Section 5.0 Safety and Security Requirements:

- 5.1 How are the records/information/data in the information system covered by this system of records notice (SORN) stored and maintained?

- IT database management system (DBMS)
- Storage media including CDs, CD-ROMs, *etc.*
- Electronic tape
- Paper files
- Other:

- 5.2 Is the information collected, stored, analyzed, or maintained by this information system available in another form or from another source (other than a "matching agreement" or *MOU*, as noted above)?

- Yes
- No

Please explain your response:

- 5.3 Is the information system covered by this system of records notice (SORN) part of another FCC information system that collects personally identifiable information (PII)?

- Yes
- No

Please explain your response:

The Pay, Leave, and Garnishment Records information system is a "stand alone" information system. It has no links to other FCC information systems.

If this information system is not part of another FCC information system, please skip to Question 5.7.

- 5.4 If the information system (under review here) has personally identifiable information (PII) and is part of another FCC information system, is there a transfer of records/data/information between these two FCC information system(s)?

- Yes
- No

Please explain your response:

5.5 If the information system's personally identifiable information (PII) is part of another FCC information system, does the information system have processes and/or applications that are part of those from the other FCC information systems?

- Yes
 No

Please explain your response:

5.6 If either or both such situations, as noted in Questions 5.4 and 5.5 exist, what security controls are there to protect the PII information and to prevent unauthorized access?

- Not applicable.

Please explain your response:

5.7 Would the unavailability of this information system prevent the timely performance of FCC operations?

- Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system performs several necessary functions for the Commission. This information system:

- (1) collects, stores, and uses the data covering each FCC employee's payroll, income tax, charitable, and other financial transactions that are required under Federal and State laws and regulations; and
- (2) identifies those FCC employees who are subject to garnishment and levy orders served on the FCC for implementation, correspondence, and memorandum by a court of competent jurisdiction or other government entity authorized to issues such order(s).

Without this information system, it would be very difficult for the FCC to comply with Federal and state regulations governing income tax and other income withholding requirements, union, medical, retirement, and charity payroll withholding allocations, etc., and court and other government agencies regulations on wage garnishment orders served on Commission employees.

5.8 Will the information system include an externally facing information system or portal such as an Internet accessible web application at www.fcc.gov or other URL that allows customers/users to access development, production, or internal FCC networks, and which may pose potential risks to the information's security?

- Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system does have links to the USDA, IRS, NFC and other federal and state revenue/taxation agencies, etc., with which it transmits/shares information via electronic transmission mechanisms. There are no Internet, URL, or other access portals with public access.

If the information is collected by some method or mechanism other than the externally facing information system portal at www.fcc.gov or other URL, please skip to Question 5.11.

5.9 If the information is collected via www.fcc.gov or other URL from the individuals, how does the information system notify users about the Privacy Notice:

- Link to the FCC's privacy policies for all users:
- Privacy notice displayed on the webpage: The NFC has a privacy notice at: <https://www.nfc.usda.gov/>.
- Privacy notice printed at the end of the form or document: Each OPM SF form and IRS form that individuals use and from which the FCC obtains information for this information system carries a privacy notice.
- Website uses another method to alert users to the Privacy Act Notice, as follows:
- If there is no link or notice, why not:

5.10 If a privacy notice is displayed, which of the following are included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies whether providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

5.11 Will the information system include another customer-facing web site not on www.fcc.gov or other URL?

- Yes
- No

Please explain your response:

If the information is collected by some method or mechanism other than via the FCC Internet website at www.fcc.gov or the FCC Intranet for FCC employees and contractors working at the FCC, please skip to Question 5.14.

5.12 If the information system has a customer-facing web site via the FCC Intranet for FCC employees and contractors working at the FCC, does this web site(s) have a Privacy Act Notice and how is it displayed?

- Yes
 - Notice is displayed prominently on this FCC Intranet website:
 - Link is provided to a general FCC Privacy Notice for all users:
 - Privacy Notice is printed at the end of the form or document:
 - Website uses another method to alert users to the Privacy Act Notice:
- No:

If there is no Privacy Act Notice, please explain why not:

5.13 If a privacy notice is displayed, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

If information is collected by some method or mechanism other than by fax, e-mail, FCC form(s), or regular mail, please skip to Question 5.16.

5.14 If information is collected from the individual by fax, e-mail, FCC form(s), regular mail, or some other means not listed above, how is the privacy notice provided?

- Privacy notice is on the document, *e.g.*, FCC form, *etc.* OPM SF forms and IRS forms each carry a privacy notice.
- Privacy notice displayed on the webpage where the document is located:
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at www.fcc.gov.
- Website or FCC document uses other method(s) to alert users to the Privacy Act Notice:
- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls:
- No link or notice, please explain why not:
- Not applicable, as personally identifiable information (PII) will not be collected.

5.15 If a privacy notice is displayed, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in any other way.

Please explain your response:

If there is no access to the information system from outside the FCC via www.FCC.gov or other URL, please skip to Question 5.17.

5.16 If consumers may access the information and/or the information system on-line via www.FCC.gov, does it identify ages or is it directed to people under 13 years old?

- Yes
 No

Please explain your response:

5.17 Will the FCC use the newly obtained information or revised information in this information covered by the existing system of records notice (SORN) to make a determination about the individual?

- Yes
 No

Please explain your response:

The FCC's Pay, Leave, and Garnishment Records information system, including the PII that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, does not make any determinations about employees; rather its purposes are:

- (1) to collect, store, maintain, and use the financial records that concern FCC employee pay, tax, SSN, leave, and other personnel information as required by Federal and State laws and regulations; and
- (2) to maintain information on those FCC employees who are subject to garnishment and levy orders for implementation, correspondence, and memorandum issued by a court of competent jurisdiction or by other government entity authorized to issue such orders.

5.18 Do individuals have the right to decline to provide personally identifiable information (PII)?

- Yes
 No

Please explain your response:

FCC employees may decline to provide some personally identifiable information (PII) in the Pay, Leave, and Garnishment Records information system, including the PII covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, but they may not decline to provide other PII, *i.e.*, information required by Federal and state income tax regulations and garnishment and levy orders issued by a court of competent jurisdiction or other government entity authorized to issue such orders. Furthermore, an individual's failure to provide his/her PII may also prevent the FCC from processing his/her employee benefits, *etc.*

5.19 Do individuals have the right to consent to particular uses of their personal information?

- Yes
 No

Please explain your response:

FCC employees may have the right to consent to certain uses of their personal information in the Pay, Leave, and Garnishment Records information system, including the PII covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, but for other uses, *i.e.*, PII required by Federal and state income tax regulations and garnishment and levy orders issued by a court of competent jurisdiction or other government entity authorized to issue such orders, they

do not have the right to consent. When an individual does decline to provide his/her PII, this may prevent the FCC from processing his/her employee benefits, *etc.*

If individuals do not have the right to consent to the use of their information, please skip to Question 5.22.

5.20 If individuals have the right to consent to the use of their personal information, how does the individual exercise this right?

5.21 What processes are used to notify and to obtain consent from the individuals whose personal information is being collected?

5.22 Is the information, *i.e.*, records, data, documents, *etc.*, that the information system collects, uses, maintains, *etc.*, being used to produce reports on the individuals whose PII is part of this information covered by the system of records notice (SORN)?

Yes

No

Please explain your response:

Pay, Leave, and Garnishment Records information system is not used to produce any reports on individuals. This information system uses the personally identifiable information (PII) that FCC employees provide, as required by federal and state statutes and regulations:

(1) to comply with IRS payroll deductions;

(2) to collect IRS indebtedness, to pay unemployment taxes;

(3) to pay child support;

(4) to authorize other payroll deductions for union dues, charitable donations;

(5) to determine eligibility for leave donations, to perform descriptive statistical analyses; and

(6) to comply with garnishment and levy orders issued by a court of competent jurisdiction or other government entity authorized to issue such orders, *etc.*

5.23 What safeguards and security measures, including physical and technical access controls, are in place to secure the information and to minimize unauthorized access, use, or dissemination of the information that is stored and maintained in the information system?

(Check all that apply)

Account name

Passwords

Accounts are locked after a set period of inactivity

Passwords have security features to prevent unauthorized disclosure, *e.g.*, “hacking”

Accounts are locked after a set number of incorrect attempts

One time password token

Other security features:

Firewall

- Virtual private network (VPN)
- Data encryption:
- Intrusion detection application (IDS)
- Common access cards (CAC)
- Smart cards:
- Biometrics
- Public key infrastructure (PKI)
- Locked file cabinets or fireproof safes
- Locked rooms, with restricted access when not in use
- Locked rooms, without restricted access
- Documents physically marked as "sensitive"
- Guards
 - Identification badges
 - Key cards
 - Cipher locks
 - Closed circuit TV (CCTV)
- Other:

5.24 Please explain what staff security training and other measures are in place to assure that the security and privacy safeguards are maintained adequately?

All FCC employees and contractors who work with the information that is collected, used, stored and maintained in the Pay, Leave, and Garnishment Records information system, including the PII that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, are required to complete privacy training. In addition the HRM staff provides various notices and warnings to the employees and contractors who have access that the PII is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less:
- One year: The HRM staff reviews the security controls in the Pay, Leave, and Garnishment Records information system at least annually.
- Two years
- Three years
- Four years
- Five years
- Other:

5.26 How often are personnel (information system administrators, users, information system/information system developers, contractors, *etc.*) who use the information system trained and made aware of their responsibilities for protecting the information?

- There is no training
- One year: Beginning in September 2006, the FCC inaugurated a Commission-wide privacy training program that has required all FCC employees and contractors to complete a privacy training course when they first come to work at the FCC. Employees and contractors are then required to take a refresher course annually thereafter.
- Two years
- Three years
- Four years
- Five years

Other:

If privacy training is provided, please skip to Question 5.28.

5.27 What are the safeguards to insure that there are few opportunities for disclosure, unavailability, modification, and/or damage to the information system covered by this system of records notice (SORN), and/or prevention of timely performance of FCC operations if operational training is not provided?

5.28 How often must staff be “re-certified” that they understand the risks when working with personally identifiable information (PII)?

Less than one year:

One year: The HRM staff requires that the personnel who use the Pay, Leave, and Garnishment Records information system, including FCC employees and contractors working at the FCC, be trained at once a year about their responsibilities for protecting the PII contained in the Pay, Leave, and Garnishment Records information system.

Two years

Three or more years

Other re-certification procedures:

5.29 Do the Commission’s training and security requirements for this information system that is covered by this system of records notice (SORN) conform to the requirements of the Federal Information Security Management Act (FISMA)?

Yes

No

Please explain your response:

The Pay, Leave, and Garnishment Records information system is a "non major" information system, and as such, it is exempt from the FISMA requirements.

If the Privacy Threshold Analysis was completed recently as part of the information system’s evaluation, please skip to Question 5.34.

5.30 What is the potential impact on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs? (check one)

Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.

Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.

Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

The Pay, Leave, and Garnishment Records information system contains sensitive personally identifiable information (PII), *i.e.*, Social Security Numbers, income tax data, *etc.*, which relates to each FCC employee's payroll, taxation, indebtedness, Social Security, unemployment insurance, other compensation, leave requests, garnishment and levy orders, *etc.* In advertent disclosures could subject an individual to potential fraud and other serious financial and personal matters that would be extremely detrimental.

5.31 Is the impact level for the information system(s) covered by this system of records notice (SORN) consistent with the guidelines as determined by the FIPS 199 assessment?

- Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system is a "non major" information system, and as such, it is exempt from the FIPS 199 assessment guidelines.

5.32 Has a "Certification and Accreditation" (C&A) been completed for the information system(s) covered this system of records notice (SORN)?

- Yes
 No

If yes, please explain your response and give the C&A completion date:

The Pay, Leave, and Garnishment Records information system is a "non major" information system, and as such, it is exempt from the C&A requirement.

5.33 Has the Chief Information Officer (CIO) and/or the Chief Security Officer (CSO) designated this information system as requiring one or more of the following:

- Independent risk assessment:
 Independent security test and evaluation:
 Other risk assessment and/or security testing procedures, *etc.*: The FCC conducts an "in house" review.
 Not applicable:

5.34 Is the system using technology in ways that the Commission has not done so previously, *i.e.*, Smart Cards, Caller-ID, *etc.*?

- Yes
 No

Please explain your response:

The Pay, Leave, and Garnishment Records information system does not use any smart cards or other technologies except for information technology (IT) that is necessary to store, process, and use the electronic records and data that are maintained in the FCC's computer network databases.

5.35 How does the use of the technology affect the privacy of the general public and FCC employees and contractors?

The Pay, Leave, and Garnishment Records information system is an information system that includes both paper documents, files, and related materials and electronic records and data that are maintained on the FCC's computer network databases. The information system collects data on FCC employees pursuant to Federal and State statutes and regulations governing taxes and withholding, Social Security, unemployment, employee leave, and other financial and personnel requirements, and garnishment and levy orders for implementation, correspondence, and memoranda. The FCC maintains strict requirements on which HRM and IT staff have access to this information and how the information is collected, processed, used, and maintained. These regulations are designed to protect the employees whose PII is being used and to minimize the risk of the inadvertent disclosure of this PII.

5.36 Will the information system that is covered by this system of records notice (SORN) include a capability to identify, locate, and/or monitor individuals?

- Yes
 No

Please explain your response:

The FCC's Pay, Leave, and Garnishment Records information system, including the PII that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, does not include any capability to identify, locate, and/or monitor individuals; rather its purposes are:

- (1) to collect, store, maintain, and use the financial records that concern FCC employee pay, tax, SSN, leave, and other personnel information as required by Federal and State laws and regulations; and
- (2) to maintain information on those FCC employees who are subject to garnishment and levy orders for implementation, correspondence, and memorandum issued by a court of competent jurisdiction or by other government entity authorized to issue such orders. One of the purposes of the Pay, Leave, and Garnishment Records information to locate specific individuals for Human Resource Management functions.

If the information system does not include any monitoring capabilities, please skip to **Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

5.37 If the information system includes these technical capabilities identified in Questions 5.34 through 5.36 above, what kinds of information will be collected as a function of the monitoring of individuals?

5.38 Does the information system covered by this system of records notice (SORN) contain any controls, policies, and procedures to prevent unauthorized monitoring?

- Yes
 No

Please explain your response:

Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):

6.1 Does this system of records notice (SORN) require non-FCC employees and contractors to perform any paperwork or recordkeeping activities?

- Yes, individuals, who are not FCC employees or contractors, are required to complete paperwork or recordkeeping functions or activities, *i.e.*, fill out forms and/or licenses, participate in surveys, and or maintain records *etc.*

Please explain your response:

- No, individuals, who are not FCC employees or contractors, are not required to perform any paperwork or recordkeeping functions or activities

Please explain your response:

- No, this system of records notice includes only FCC employees and/or contractors, which exempts it from the PRA. Please skip to **Section 7.0 Correction and Redress**:

6.2 If the website requests information, such as the information necessary to complete an FCC form, license, authorization, *etc.*, has the information collection covered by this system of records notice (SORN) been identified for possible inclusion under the FCC's Paperwork Reduction Act (PRA) requirements?

- Yes
 No

Please explain your response:

If there are no PRA information collections associated with the information system or its applications, please skip to **Section 7.0 Correction and Redress**:

6.3 If there are one or more PRA information collections that are covered by this system of records notice (SORN) that are associated with the information system's databases and paper files, please list the OMB Control Number, Title of the collection, and Form number(s) as applicable for the information collection(s):

6.4 If there are any FCC forms associated with the information system(s) covered by this system of records notice (SORN), do the forms carry the Privacy Act notice?

- Yes:
 No
 Not applicable—the information collection does not include any forms.

6.5 Have the system managers contacted the Performance Evaluation and Records Management (PERM) staff to coordinate PRA requirements and submission of the information collection to the Office of Management and Budget?

- Yes
 No

Please explain your response:

Section 7.0 Correction and Redress:

7.1 Are the procedures for individuals wishing to inquire whether this system of records notice (SORN) contains information about them consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

- Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals wishing to inquire whether the Pay, Leave, and Garnishment Records information system, which is covered by the FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, contains information about them may address their inquiries to the system manager, Associate Managing Director, Human Resources Management (AMD-HRM). This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this SORN.

- 7.2 Are the procedures for individuals to gain access to their own records/information/data in this information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals who seek access to the information about them that is contained in the Pay, Leave, and Garnishment Records information system, and which is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, may address their inquiries to the system manager, Associate Managing Director, Human Resources Management (AMD-HRM) (AMD-HRM). This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

- 7.3 Are the procedures for individuals seeking to correct or to amend records/information/data about them in the information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals seeking to correct or to amend information about them in the Pay, Leave, and Garnishment Records information system, which is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, may address their inquiries to the system manager, Associate Managing Director, Human Resources Management (AMD-HRM) (AMD-HRM). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

- 7.4 Does the FCC provide any redress to amend or correct information about an individual covered by this system of records notice (SORN), and if so, what alternatives are available to the individual, and are these consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

Yes
 No

Please explain your response:

Individuals seeking any redress to amend or correct information about them in the Pay, Leave, and Garnishment Records information system, which is covered by FCC/OMD-14, "Pay, Leave,

and Garnishment Records” SORN, may address their inquiries to the system manager, Associate Managing Director, Human Resources Management (AMD-HRM). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

If this is a new system of records notice (SORN), please skip to Question 7.6.

7.5 Have the sources for the categories of records in the information system(s) covered by this system of records notice (SORN) changed?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

The sources for the categories of records in the FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, which covers the PII that is collected, used, and maintained by the Pay, Leave, and Garnishment Records information system remain unchanged. These record sources are:

- (1) for pay and leave requirements: subject FCC employees and FCC managers; and
- (2) for garnishment and levy orders: bankruptcy courts, state domestic relations courts, state public health and welfare departments or agencies, Internal Revenue Service, and intra-agency memoranda..

7.6 Does this system of records notice (SORN) claim any exemptions to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about them in this SORN, and if so, are these exemptions consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.561?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, does not claim any exemption to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about themselves in this SORN.

7.7 What processes are in place to monitor and to respond to privacy and/or security incidents? Please specify what is changing if this is an existing system of records notice (SORN) that is being updated or revised?

The HRM supervisors issue periodic reminders to its staff that the information in the Pay, Leave, and Garnishment Records information system's electronic records, including the PII that is covered by FCC/OMD-14, “Pay, Leave, and Garnishment Records” SORN, that the information is "non public for internal use only." The HRM staff also notifies those granted access to the information that they are to keep the information confidential and to safeguard any printed materials.

- 7.8 How often is the information system audited to ensure compliance with FCC and OMB regulations and to determine new needs?
- Six months or less
 - One year: The Pay, Leave, and Garnishment Records information system has an annual audit.
 - Two years
 - Three years
 - Four years
 - Five years
 - Other audit scheduling procedure(s):

Section 8.0 Consumer Satisfaction:

- 8.1 Is there a customer satisfaction survey included as part of the public access to the information covered by this system of records notice (SORN)?
- Yes
 - No
 - Not applicable

Please explain your response:

Information in the Pay, Leave, and Garnishment Records information system's electronic records, including the PII that is covered by FCC/OMD-14, "Pay, Leave, and Garnishment Records" SORN, is "non public for internal use only;" consequently, a customer satisfaction survey is not applicable.

If there are no Consumer Satisfaction requirements, please skip to **Section 9.0 Risk Assessment and Mitigation:**

- 8.2 Have any potential Paperwork Reduction Act (PRA) issues been addressed prior to implementation of the customer satisfaction survey?
- Yes
 - No

Please explain your response:

If there are no PRA issues, please skip to **Section 9.0 Risk Assessment and Mitigation:**

- 8.3 If there are PRA issues, were these issues addressed in the PRA component of this PIA template?
- Yes
 - No

Please explain your response:

Section 9.0 Risk Assessment and Mitigation:

9.1 What are the potential privacy risks for the information covered by this system of records notice (SORN), and what practices and procedures have you adopted to minimize them?

Risks:	Mitigating factors:
<p>a. Information in the Pay, Leave, and Garnishment Records information system's personally identifiable information (PII) is contained in paper copy documents, files, and records that are stored in file cabinets in the Human Resources Management Division of OMD (OMD-HRM).</p>	<p>a. PII that is contained in the paper copy documents, files, and records is stored in file cabinets that are locked when not in use. These file cabinets are located in the HRM suite.</p>
<p>b. Information in the Pay, Leave, and Garnishment Records information system's personally identifiable information (PII) is contained in electronic records and data that are maintained on the FCC's computer network databases.</p>	<p>b. PII that is contained in the FCC's computer network databases is protected with passwords and other security measures as identified in Section 5.23. In addition, access to the information is restricted to staff in HRM and ITC.</p>

9.2 What is the projected production/implementation date for the information system:

Initial implementation: April 2006
 Secondary implementation: April 2009
 Tertiary implementation:
 Other implementation:

9.3 Are there any ancillary and/or auxiliary information system(s) applications linked to this information system that is covered by this system of records notice (SORN), which may also require a Privacy Impact Assessment (PIA)?

- Yes
- No

If so, please state the application(s), if a Privacy Impact Assessment (PIA) has been done, and the completion date for PIA:

At this time, the HRM staff does not anticipate that there will be any new ancillary or auxiliary information systems linked to the Pay, Leave, and Garnishment Records information system.