



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

NOV 14 2003

MEMORANDUM FOR NAPOLEON S. AVERY
DEPUTY CHIEF HUMAN CAPITAL OFFICER

FROM:

Maya A. Bernstein
Privacy Advocate

A handwritten signature in black ink, appearing to read "Maya A. Bernstein".

SUBJECT:

Privacy Impact Assessment for
Career Connector Automated Recruitment System

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for Career Connector Automated Recruitment System. Based on the information you provided, we do not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or major modifications to the system.

We will forward a copy of the PIA to the Director, Modernization and System Security, to be included in the Security Accreditation Package for formal acceptance for operation. If you have any questions, please contact me at (202) 927-5170, or your staff may call Dorothy D'Antoni at (202) 622-9466.

Attachment

cc: Director, Modernization and System Security OS:MA:M

Section 2. Data in the System

2.1 Generally describe the information to be used in the system in each of the following categories:

2.1.1 *Taxpayer Data*

No Taxpayer Information is collected

2.1.2 *Job Applicants*

The data collected in the CareerConnector will consist of job applicant personal data, job vacancy data, and assessment results. The system will collect information about job applicants to determine if they meet minimum qualifications and eligibility requirements for specific job listings. Information collected from applicants includes:

1. *Applicant Personal Data:*

a) *Applicant Personal Data (Required):*

- First Name
- Middle Name
- Last Name
- Social Security Number (SSN)
- Home Address
- Telephone Numbers
- Email Address
- Secret Question (for password)
- Secret Question Answer
- Applicant provided Password
- Citizenship
- Military service
- Veteran Status
- Lowest grade for which applying
- Resume (plain text field to paste a resume, max 16,000 characters)
- Notification Preference (No Notification, All Notification, or Selective Notification)

b) *Applicant Personal Data (Optional):*

- Age
- Race
- National origin data
- Professional certifications

2. *Job Vacancy Data:*

- Announcement Number
- Vacancy Description

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- Open Period
 - Series/Grade Level
 - Salary
 - Promotion Potential
 - Hiring Agency
 - Duty Locations
 - Skills
 - Point of Contact
 - Additional Information (Summary of Requirements)

3. Assessment Data Results:

- Vacancy Filtering Options (Open, Closed, Filled, Cancelled or All)
- Vacancy Number
- Vacancy Description
- Applicant Name
- Grade Criteria
- Duty Location
- Vacancy Questions

The SSN data are required in order to positively identify the applicants applying for IRS positions. To uniquely identify each applicant, only the Human Resource staff uses the SSN. This information is only available to those directly involved in the recruitment cycle or in data administration.

Race and national origin (RNO) data are collected on a cumulative basis and are not associated with any individual.

The following statements will be visible in the system when the RNO data are requested:

“Please read this message before proceeding: We request that you furnish demographic information under the Authority of 42 U.S.C. & 2000e-16, which require that Federal employment practices be free from discrimination and provide equal employment opportunities for all. Solicitation of this information is in accordance with Department of Commerce Directive 15, “Race and Ethnic Standards for Federal Statistics and Administrative Reporting.” This information is requested to help us determine if our recruitment efforts are reaching all segments of the country, as required by Federal law. It will be used for planning and monitoring equal employment opportunity programs. You are the only one who can provide this important information. It is not available from any other source. Furnishing this information is totally voluntary.”

“If you choose to provide this information, your responses will be treated in a highly confidential manner. The information will be encrypted within CareerConnector and stored as statistical data separate from the other registration information that you provide. Your demographic information will be tallied with other applicants for statistical evaluation in a manner that cannot be associated with you. The responses you provide will not be considered in the processing of your application. They will not be released to

the public or to any individual or panel associated with rating, ranking, or selection. None of this information will be placed in a personnel file or database.”

“You may provide all, some, or none of the requested information. Your choice will have no effect on you, your application, or your consideration for employment.”

“Paperwork Reduction Act and Public Burden Statements”

“The Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et. seq.) requires us to inform you that this information is being collected for planning and assessing affirmative employment program initiatives. As indicated in the message at the top of the page, response to this request is voluntary. An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB Control Number. The estimated burden of completing this form is 5 minutes per response, including the time for reviewing instructions. Please direct any comments regarding the burden estimate or any other aspect of this request to the Internal Revenue Service, National Headquarters EEO and Diversity Office, 1111 Constitution, NW, Room 2422, Washington, D.C. 20224.”

“Effects of Nondisclosure: Providing this information is voluntary. No individual selections are made based on this information.”

2.1.3 Other Data

CareerConnector provides a complete reporting package comprised of a series of standard reports and tools that allow the database to be queried by an HR specialist, as well as generate reports based on information and responses to questions provided by applicants. A utility module allows an HR user to create vacancy announcement templates, email templates and certificate templates.

2.2 What are the sources of the information in the system?

2.2.1 What IRS files and databases are used?

IRS job vacancy information from human resource managers and hiring managers will be entered into the system. This information is available from the HR Connect system. However, no direct interface or interconnection with HR Connect, others systems, or IRS files or databases exists. HR analysts enter job vacancy information into the CareerConnector system manually.

2.2.2 What Federal Agencies are providing data for use in the system?

No other Federal agencies will provide or share data with the system.

2.2.3 What State and Local Agencies are providing data for use in the system?

No state or local agencies have been identified that will provide information directly to the CareerConnector.

2.2.4 From what other third party sources will data be collected.

Data will not be collected from third party sources. Only data collected from internal and external applicants and from the human resources and hiring managers is collected.

2.3 How will data collected from sources other than IRS records and the taxpayer be verified for accuracy?

Data collected from sources other than the IRS or applicant will not be used within this system.

2.4 How will data be checked for completeness?

Data are received directly from first party sources, namely applicants and hiring officials and are considered complete and accurate. The CareerConnector application code requires that specific fields be completed and that specific fields are completed in the proper format prior to accepting the data on the entire page and allowing the user to continue to the next entry screen. Other fields accept the data entered exactly as received. Information provided by the job applicant will be used to make employment decisions. Applicants self-certify the data. It is in their best interest to ensure that the data are complete.

2.4.1 Are the data current?

Yes. Information provided by the job applicant will be used to make employment decisions. It is in the best interest of the applicant to ensure that the data are accurate and current. Vacancy listings are active using a start and end date. Job vacancy support data (job numbers, salary scales, job codes, etc.) are static data, but can be edited, corrected, or updated by a user with appropriate permissions when the data changes. To ensure that the data are most current, each applicant has the ability to update their personal information and responses to questions until the closing of a vacancy announcement.

2.4.2 How is this verified?

It is the responsibility of the applicant entering data to ensure that the data provided to the system is current. After initial registration, applicants can update and verify their data at any time to ensure that it is current up to the closing of the announcement.

2.5 Are the data elements described in detail and documented? If yes, what is the name of the document?

- Yes. CareerConnector is composed of the software application XXXXXX. High-level module descriptions and use cases, which identify data elements are documented in the *CareerConnector Architectural Design Description* document, dated November 6, 2002.

Section 3. Access to the Data

3.1 Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?

Access to CareerConnector is limited to the following high-level user categories:

CareerConnector HR administrators – Access is limited to the Vacancy Module and User Manager utility, and Data Administration Module for the purpose of adding and maintaining vacancy notices to authorize new user accounts and to assign data/group privileges. HR personnel and hiring managers will have access to job application data submitted by applicants and to system developed assessment results. XXXXX personnel are responsible for troubleshooting the system, as needed.

- System Operations (for backup and archive activities) – Access is limited to the server functions needed to support system operations. (Contractors and IRS Personnel)
- Job Applicants – Access is limited to the publicly accessible application processes to enter application data and search for job vacancies and to their specific personal data.
- System and Database Administrators – Access is limited to the application and database functions need to maintain appropriate application operations.

3.2 How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

As applied to CareerConnector, access to data and functions within the system is granted based on job function need and is authorized by appropriate IRS management. Applicant access to data is controlled within the technical features of the system. The system has a permission-based architecture and access is limited to those who have been approved to support the system. Users are provided access permissions through group assignment within the system. The system effectively restricts users to the CareerConnector level of data and functionality to which they have been granted the required authorization.

CareerConnector provides a User Manager utility that allows the system administrator(s) the ability to add, modify, and delete users and change their permissions in the CareerConnector system. Inside the user manager utility of CareerConnector, system administrators have the ability to review, distribute, and revoke privileges from users.

CareerConnector User Manager utility allows for the creation of groups of users who share the same permissions. Assigning a user to a group gives that user all of the same rights that have been assigned to that group. However, should a user be assigned to multiple groups, the group with the most permissions will prevail over the groups with lesser permissions. For this reason, assigning individual users to particular groups should be done judiciously while employing the doctrine of least privilege.

The CareerConnector application identifies, authenticates, and authorizes users and controls appropriate user permissions to perform specific actions. The login module will enforce access

control, establish user sessions, validate the session at each new request, and authorize users based on the user group to which they belong. The login component is a predecessor to all other components of the CareerConnector Web Application as no other components will be accessible without first completing login and establishing a user session.

In reference to the IRM Section 4.3.3.2.2 Controlled Access, HR employees will be required to complete Form 5081, Information System User Registration/Change Request, and acknowledge that they understand the security rules located on the reverse side of the form. Internal applicants that will utilize the system are not required to complete Form 5081. System administrators will be responsible for information from the servers and both system administrators and the CareerConnector Security Specialist will be responsible for the CareerConnector Application data. Due to access limitations, contracted employees are not required to complete Form 5081.

Please Note: IRS Safeguards Office (HQS) has reviewed the service contract with XXXX, required modifications and required that all contractor employees will sign and date a "Non-Disclosure Agreements."

3.3 Will users have access to all data on the system or will the user's access be restricted? Explain.

The "user" will primary be made up of external and internal job applicants and HR administrators. All users will access the system data through a web interface. CareerConnector components are restricted and accessed based on a user's group and role permissions.

Approved system and database administrators who maintain the system can access system support applications and databases.

3.4 What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?

Ad hoc query access to the CareerConnector data stores is not allowed by policy, with the exception of troubleshooting and problem resolution by the DBA and other system administration personnel, as required.

The data query function within the application is available to collect and report statistical information and cannot be associated with specific individuals. The function's use is limited to HR analysts and is controlled through user profiles. Because contracted employees will not have access for manipulating data in the system, possible misuse of the data is eliminated.

3.5 Do other systems share data or have access to data in this system? If yes, explain.

No. The CareerConnector system does not directly share data with other systems. However, the system does rely on a hosted DNS server, individual applicant workstations and Internet Service Providers, and IRS HR employee workstations connecting to the system through the Internet using a secure connection.

The DNS only supports email and domain name recognition. The applicant workstations will send and receive job vacancy information and personal information about the specific applicant

using the workstation. The IRS HR employee workstations are used to update job vacancy information and retrieve job applications submitted and system generated assessment results information. The IRS will provide hosting for the DNS.

3.5.1 Who will be responsible for protecting the privacy rights of the taxpayers and employees affected by the interface?

IRS Chief Human Capital Officer will protect privacy rights of internal and external applicants. CareerConnector does not collect taxpayer data.

3.6 Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?

Upon initial implementation, CareerConnector will only be used to support the IRS. However, CareerConnector is a Treasury enterprise system that will eventually be used by other Department offices and bureaus to post vacancy announcements and rate, rank, and refer applicants for employment consideration. Once registered in CareerConnector, applicants may choose to apply for positions with any Treasury office or bureau vacancies that are posted in the system.

This PIA applies only to the IRS. It is the responsibility of each Department office and bureau to comply with privacy act and other safeguard and disclosure guidelines before CareerConnector implementation.

Job applicant data may be provided to other Federal agencies or organizations if the IRS is legally obligated to do so. Example agencies or organizations include the Government Accounting Office (GAO) or TIGTA.

3.6.1 How will the data be used by the agency?

Not Applicable – Other agencies and systems do not share or access the CareerConnector system.

3.6.2 Who is responsible for assuring proper use of the data?

Not Applicable – Other agencies and systems do not share or access the CareerConnector system.

3.6.3 How will the system ensure that agencies only get the information they are entitled to under IRC 6103?

Not Applicable – Other agencies and systems do not share or access CareerConnector.

External agencies have no access to the system (except TIGTA). CareerConnector does not contain tax return information protected by IRC § 6103.

Section 4. Attributes of the Data

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

Yes. The information collected and maintained in CareerConnector is both relevant and necessary to support the hiring of capable and qualified candidates for posted job vacancies within the IRS. Only data needed to evaluate applicant qualifications and contact the applicant, process the data, and to provide required statistical and administrative information is collected and maintained.

4.2 Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

No. The system will derive information about an individual in the form of assessment results. The system, using answers provided by the applicant, will calculate assessment results against the specific vacancy the applicant applied for. The system will not create new and previously unavailable data as these assessment results are currently calculated manually. The same assessment logic for scoring applicants that is used in the current manual process is used within the system.

4.3 Will the new data be placed in the individual's record (taxpayer or employee)?

No new data are produced. The assessment results information is maintained in the system and associated with the individual and within an individual applicant folder for those determined to be qualified for a specific vacancy.

4.4 Can the system make determinations about taxpayers or employees that would not be possible without the new data?

No new data are produced. The applicant assessment results are used to determine if an individual applicant is qualified for a specific job vacancy and calculates a qualification score unique to the individual.

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

No new data are produced. The applicant assessment results information is relevant to the recruitment cycle as it determines applicants' qualifications for specific job vacancies. The information is generated from data entered by the applicant and it is in the best interest of the applicant to enter accurate data and to verify that data. Applicants have the ability to update or correct their own information up to the closing of the announcement.

4.6 If processes are being consolidated, are there proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

No existing automated processes are being consolidated. Manual processes are being consolidated with the implementation of this system. Security controls equivalent to or exceeding the current controls are being implemented to provide for physical and technical security.

4.7 How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain.

Yes. The individual applicants retrieve their own specific information using a unique identifier, which is the applicant's Social Security Number (SSN). The SSN is required as soon as an application is submitted to identify the individual. The applicant personal information to include the SSN is transmitted through a secure connection. The CareerConnector HR employees can retrieve information using predetermined reports. Ad hoc query capabilities are restricted from all users except system and database administrators.

4.8 What are the potential effects on the due process rights of taxpayers and employees of:

4.8.1 Consolidation and linkage of files and systems;

The system does not consolidate and link files and systems. The system does not interconnect with other systems or files. No effects to taxpayer or employee due process rights exist.

4.8.2 Derivation of data;

The system does not derive new data. Applicant assessment results are created based on answers to questions provided by the applicant, but this same process and data currently exists in a manual process. No effects to taxpayer or employee due process rights exist.

4.8.3 Accelerated information processing and decision making;

Although the system will accelerate the acceptance, processing, and decision making of applications, no effects to taxpayer or employee due process rights exist. The system automates current manual process and providing a more convenient method for the applicant to submit job applications. Decision-making is conducted using the same information currently available through the manual process.

4.8.4 Use of new technologies;

The system automates previously manual processes and therefore is introducing new technologies to the process. The system provides the same processes as previously, only automating them. There is no effect on to taxpayer or employee due process rights, as the applicants maintain due process rights determined by 5 CFR, Subchapter B-Civil Service Regulations remained unchanged.

4.8.5 How are the effects to be mitigated?

There are no effects to be mitigated.

Section 5. Maintenance of Administrative Controls

5.1 Explain how the system and its use will ensure equitable treatment of taxpayers and employees.

CareerConnector supports external and internal IRS applicants equally requiring each to access the system through the same Internet site. The system will ensure that treatment of job applicants is equitable to the traditional paper-based manual process based on its convenience and impartiality. Applicants may apply for specific job vacancies based on Federal hiring guidelines set within the system. Each applicant is provided access to the same information through the Internet and follows the same application base on specific-position criteria. CareerConnector applies the same automated assessment results calculation process to every applicant for a particular vacancy announcement.

5.2 If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

CareerConnector is maintained at one single contractor site located at XXXXXXXXXXXX, XXXXXXXXXXXXXXXXXXXXXXXXXXXX, operated by XXXXX. The system, which is available for use over the Internet, is managed from the XXXXX site located at XXXXXX XXXXXXXXXXXXXXXXXXXX. Consistent use of the system and data are maintained through a single set of security policies enforced by technical controls throughout the system. Permissions to the system are accessed based on assigned user groups which are tightly controlled.

5.3 Explain any possibility of disparate treatment of individuals or groups.

CareerConnector provides no processing that would result in disparate treatment of individuals or groups. Existing policies, practices, and procedures that ensure equal and fair treatment of all applicants will continue to be enforced and practiced.

5.4 What are the retention periods of data in the system?

Records are maintained in accordance with Records Disposition Handbooks, IRM 1.15.59.1 through IRM 1.15.59.32. Records will be archived from the system on an appropriate schedule. The electronic records will be governed by the same guidelines as paper records (36 CFR, Chapter XII, Subchapter B, Records Management).

5.5 What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?

Records will be deleted in accordance with Records Disposition Handbooks, IRM 1.15.59.1 through IRM 1.15.59.32. The electronic records will follow the same disposition standards for federal records as established by the National Archives and Records Administration.

5.6 While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

The information is retained for legal purposes until the recruitment cycle is complete the data are no longer required. During the recruitment cycle, each applicant is responsible for any necessary updates to his or her own applicant data. The job evaluation data are static and will remain the same throughout the recruitment cycle.

5.7 Is the system using technologies in ways that the IRS has not previously employed (e.g., Caller-ID)?

No. The system is using the Internet to accept applications and the system is managed and hosted through an Application Service Provider and while this method may be new to HR, the technology is not new or unique to IRS.

5.7.1 How does the use of this technology affect taxpayer/employee privacy?

The technology does not affect taxpayer or employee privacy. The system will be housed in a trusted and secure facility and accessed only by authorized personnel. Data are being sent in an encrypted format between the applicant's client station and the system through the Internet. The appropriate privacy notices will be displayed on the website, notifying applicants that any information received will only be used in the recruitment cycle. Any information provided is strictly voluntary and applicants will always have the option of applying through traditional paper methods.

5.8 Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

Yes. The system will have the capability to locate and contact job applicants using the provided telephone number, address, and email addresses. The system will not monitor applicants.

The system will provide audit trails and logs that will provide the capability to identify and monitor the actions of the DBA and other administrative actions within the system.

The system can collect IP addresses from connections as part of the Intrusion Detection system in the event of attempted system tampering. The system will not use permanent Cookies.

5.8.1 Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.

No, the system will not provide the capability to identify, locate, and monitor groups of people.

5.8.2 What controls will be used to prevent unauthorized monitoring?

The web-based form will be submitted using the Secure Sockets Layer (SSL) protocol to secure the data, encrypting the data. Additionally, the system will not collect information that is not necessary for the recruitment cycle or for system operations and security. Administrative actions conducted within the system will be captured within system and application audit logs.

5.9 Under which Systems of Record Notice (SORN) does the system operate? Provide number and name.

The CareerConnector is a new system designed to reduce the time and resources needed to identify and select the most qualified applicant for any position. The system will operate under the following SORNs:

OPM/Govt-5 Recruiting, Examining and Placement Records.

OPM/Govt-7. Applicant Race, Sex, National Origin, and Disability Status Records

Treasury/IRS 34.037. IRS Audit Trail and Security Records System