OCIO Office of the DOT
Chief Information Officer

U.S. Department of Transportation
Privacy Impact Assessment

National Highway Traffic Safety Administration (NHTSA)
NHTSA Resume Library

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Executive Summary

The National Highway Traffic Safety Administration (NHTSA), within the Department of Transportation (DOT), has been given the responsibility to carry out motor vehicle and highway safety programs that will reduce deaths, injuries, and economic losses resulting from motor vehicle crashes. To support NHTSA's mission, it is imperative to recruit and retain top talent. In February 2018, the Deputy Administrator delegated the task of developing a recruitment plan to address mission-critical vacancies to the Office of Human Resources (OHR). To help in the recruitment, NHTSA OHR developed a NHTSA Resume Library (hereafter Resume Library) that is housed in the OHR SharePoint (SP) portal. The Resume Library maintains resumes collected at career and college fairs as well as through other recruiting channels.

This Privacy Impact Assessment (PIA) is being conducted in accordance with the E-Government Act of 2002, as the Resume Library collects and maintains information about members of the public, such as contact information and professional experience.

What is a Privacy Impact Assessment?

The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.[1]

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.

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[1]Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).

Introduction & System Overview

In May 2016, the Office of Human Resources (OHR) issued the NHTSA Workforce Analysis 2011- 2015 which provided a comprehensive picture of the demographics of the workforce, and helped to identify employment trends across the agency.

Based on the analysis, the following conclusions were made regarding NHTSA's workforce:

- At the time of the report, NHTSA had 610 FTEs. The current FTE count is 626 (there are some vacancies-the actual number varies). There were 549 employees on board as of January 30, 2018.

- Based on an overall management and team leader retirement eligibility rate of over 47% in the next five years, 56% for Program Managers, (86% for Research and Program Development alone), and 45% for Senior Executives, recruitment efforts should be focused on the upcoming vacant leadership positions. Focusing on mission-critical occupations alone, recruitment efforts should target Criminal and Crash Investigators in our Enforcement Office, followed by Safety Defects and Recall Specialist and Highway Safety Specialist.

To support NHTSA's mission, it is imperative to have a strategic recruitment plan in place that is reviewed annually, and that helps identify and recruit highly-qualified, talented and diverse employees for mission-critical positions.

In February 2018, NHTSA's Deputy Administrator delegated the task of developing a recruitment plan to address mission-critical vacancies to OHR. A key piece of the recruitment plan is to establish recruitment best practices. One of those best practices is to establish and maintain a NHTSA Resume Library that houses resumes collected at career and college fairs as well as other recruiting channels, such as email. NHTSA staff collects these resumes in electronic or hard copy formats.

NHTSA developed a NHTSA Resume Library that is housed in the OHR SharePoint portal. Folders were created based on job series. Designated NHTSA staff will collect and upload resumes for hiring managers to review when a vacancy announcement goes public. These resumes will be retrieved by job series. The resumes likely include contact information for the candidate so that NHTSA may reach out should their skills be a match to an open position. The resumes generally also include professional experience, professional certificates, academic achievement, and academic certificates. Some may also have contact information for references. The information contained within the resume is necessary to make a determination as to the candidate's qualifications for a given position. NHTSA staff will destroy any resumes collected that do not meet the criteria for potential NHTSA positions. Only identified hiring managers who have received training on the system will be given access to Resume Library. Resumes will be retained for one year in accordance with NARA retention schedules for records of this type.

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3[2], sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information

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[2] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf

Officers Council and the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations[3].

Transparency

Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.

Individuals voluntarily provide their resume to NHTSA to be considered for vacant positions. At the time of collection, potential candidates are informed that their resume will be brought back to the agency and kept on file.

NHTSA also informs the public that their PII is stored and used by the Resume Library through this Privacy Impact Assessment published on the DOT website. This document identifies the information collection's purpose, use, and storage of PII.

The provisions of the Privacy Act do not apply to Resume Library as the information will not be retrieved by a unique identifier associated with an individual. The resumes in the Resume Library will be indexed and retrieved by job series only.

Individual Participation and Redress

DOT should provide a reasonable opportunity and capability for individuals to make informed decisions about the collection, use, and disclosure of their PII. As required by the Privacy Act, individuals should be active participants in the decision making process regarding the collection and use of their PII and be provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.

Individuals voluntarily provide their contact information to NHTSA. If an individual believes their information is being used for purposes outside of the of the reasons for which it was provided to NHTSA, or has other privacy concerns, they can contact a responsible NHTSA staff member or write to NHTSA.Privacy@dot.gov.

The NHTSA Resume Library records in the repository will not be retrieved or accessed by a unique identifier associated with or assigned to and individual. Rather, folders have been created based on job series. Resumes will be collected and uploaded into the appropriate job series based on the applicants academic and professional experience. When NHTSA has a vacant position, they will search the appropriate job series in the Resume Library and pull the resumes of any suitable candidates. NHTSA hiring managers will then reach out to the candidate to discuss the position further.

Authority and Purpose

DOT should (i) identify the legal bases that authorize a particular PII collection, activity, or technology that impacts privacy; and (ii) specify the purpose(s) for which it collects, uses, maintains, or disseminates PII.

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[3] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

Congress enacted the National Traffic and Motor Vehicle Safety Act in 1966 for the purpose of reducing deaths and injuries as a result of motor vehicle crashes. Additionally, 23 U.S.C. 4 authorizes NHTSA to assist and cooperate with other Federal departments and agencies, State and local governments, private industry, and other interested parties (such as potential candidates), to increase highway safety. The Resume Library will help promote NHTSA's mission by allowing it to hire top talent to fill mission critical positions.

The resumes and information contained therein are used expressly to identify and recruit highly-qualified, talented and diverse employees for mission-critical positions.

Data Minimization & Retention

DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected. DOT should retain PII for only as long as necessary to fulfill the specified purpose(s) and in accordance with a National Archives and Records Administration (NARA)-approved record disposition schedule. Forms used for the purposes of collecting PII shall be authorized by the Office of Management and Budget (OMB).

NHTSA collects resumes to identify and recruit highly-qualified, talented and diverse employees for mission-critical positions. The information in the resumes includes name and contact information of the applicant, contact information for references, professional experience, academic achievement, academic certificates, and professional certificates. The information is necessary to make a determination as to the candidate's qualifications for a given position.

Additionally, candidates are vetted at career fairs and other events where NHTSA engages with individuals who are interested in careers with NHTSA. NHTSA only accepts resumes from candidates that are believed to possess the knowledge, skills, and background to fill specific positions.

The records in the Resume Library will be held in accordance with General Records Schedule (GRS) 2.1 - Employee Acquisition Records. Item 60/Job Application Packages includes, "application packages for competitive positions, in USA Jobs or its successors, and other systems, whether electronic or analog. Records in the system include:

- Applications,
- Resumes,
- Supplemental forms, and
- Other attachments."

Records in NHTSA Resume Library are temporary and are destroyed 1 year after submission.

Use Limitation

DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.

The resumes and information contained in NHTSA Resume Library are used expressly to identify and recruit highly-qualified, talented and diverse employees for mission-critical positions. Should a resume be a suitable match for an open position, NHTSA will use the contact information typically included in resumes to reach out to the potential

candidate. The resumes and any information contained therein (i.e., contact information, professional experience, etc) will not be used for any other purpose.

Only identified hiring managers will be given access to the library. Hiring managers receive training through OHR on proper use of the system and the protocol for protecting the privacy of those who submit resumes. A designated point of contact in OHR is responsible for uploading and/or disposing of collected resumes, as appropriate.

The resumes collected will be reviewed every month to ensure that the candidate's knowledge, skills and background still match the ever-changing roles and responsibilities of our open jobs. Resumes will be removed from the Library after one year.

Data Quality and Integrity

In accordance with Section 552a(e)(2) of the Privacy Act of 1974, DOT should ensure that any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used, as specified in the Department's public notice(s).

NHTSA ensures that the use and maintenance of information collected for operating the Resume Library is relevant to the purposes for which it is to be used. Information is collected directly from individuals who volunteer information. As such, information contained in the resume is assumed to be accurate.

The Resume Library has its own internal process for ensuring that only authorized users can gain access, and obtain permission to perform certain functions, and maintain a single authoritative source.

Security

DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.

Records in the Resume Library are safeguarded in accordance with applicable Federal and DOT rules and policies, including all applicable DOT automated systems security and access policies. Access to the DOT/NHTSA SharePoint site containing the records in the Resume Library is limited to those individuals on a need-to-know basis for the performance of their official duties, and who have appropriate clearances and permissions. All records in the Resume Library are protected from unauthorized access through appropriate administrative and technical safeguards. Utilizing built-in security, the application also defines a set of user privileges to determine and limit who can read, edit and perform administrative functions based on granted permissions. The NHTSA OHR will only provide access to hiring managers. Only two OHR officials will have administrative rights to the system.

Accountability and Auditing

DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.

NHTSA is responsible for identifying, training, and holding Agency personnel accountable for adhering to NHTSA privacy and security policies and regulations. NHTSA will follow the FIPPS as best practices for the protection of information associated with the Resume Library. In addition, these practices, policies and procedures will be consistently applied, especially as they relate to protection, retention, and destruction of records. Federal employees will be given clear guidance regarding their duties as they relate to collecting, using, processing, and

securing data. Guidance will be provided in the form of mandatory annual Security and privacy awareness training consistent with the requirements of the Office of Management and Budget (OMB) Circular A-130, Managing Information as a Strategic Resource.

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Approval and Signature

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