

**Privacy Impact Assessment  
Admin Database-Personnel Records**

- 1. Agency: Postal Regulatory Commission**
- 2. Name of Information Technology (IT) System: Admin Database**

*The Admin Database is an approximately 20 year old MS Access database with limited administrative usability. The Commission relies upon the internal IT systems of the U.S. Postal Service for its official personnel records maintenance.*

- 3. Privacy Act System of Records Notice Identifier, (if applicable):**

*PRC-1, Personnel Records*

- 4. Authority to collect information:**

*39 U.S.C. 503*

- 5. Brief summary or overview of the IT system: Admin Database**

*The Admin Database is a MS Access database, about 20 years old, which contains personally identifiable information (PII) on current and former Commission personnel. The database is only used by the Office of the Secretary and Administration (OSA) for reference, and access is limited to OSA staff supporting human resources (HR) efforts. The official personnel records of the Commission are maintained onsite in hardcopy format and offsite within the personnel records of the Postal Service.*

*The U.S. Postal Service has replaced all Social Security numbers with Employee Identification Numbers (EIN,) and the Commission is adopting those EIN in its Human Resources records. However, the Admin Database continues to contain Social Security numbers of current and former employees.*

*The same database is used to track certain financial transactions such as credit card purchases and vendors. The database is password protected and is limited to the staff of the Office of the Secretary and Administration.*

- 6. Identifiable Information to be Collected and Nature / Source:**

*The database includes names, addresses, Social Security numbers, telephone numbers, employment dates, emergency contact information, and salary history. Data are contained on former Commission Personnel, but are not updated after departure from Commission rolls.*

**7. Method of information collection:**

*The information contained in the Admin Database-Personnel Records is collected from employees of the Commission and entered by the staff of the OSA when employees begin and end their careers at the Commission.*

**8. Purpose of the collection:**

*The database is used only as a quick reference for calculating Federal and Commission service, Annual and Sick Leave balances, emergency contact information, and salary histories by the HR staff within the OSA.*

**9. Data uses:**

*To create telephone and emergency contact lists, monitor service time for eligible service awards and retirement counseling, and review salary histories of employees. The Postal Service has replaced all Social Security numbers with Employee Identification Numbers (EIN) and the Commission is adopting those EIN in its Human Resources records.*

**10. New data about individuals derived or created by the system through aggregation:**

*Its only purposes are as stated above. No new data are derived or created through aggregation.*

**11. Internal and External Sharing:**

*The official personnel records of the Commission are shared with the Postal Service and reside within the IT systems of the Postal Service. Internally, access to the Official Personnel Folder (OPF) of employees is determined by job duties and administrative need for access.*

**12. Opportunities to object to the collection or to consent to the specific uses and how consent is granted:**

*As the records are human resource records necessary for the Commission to track leave, contact, and length of service information, there is no opportunity for affected employees to object or consent to the collection and use of this data.*

**13. Information provided by the individual at Collection, the Format, and the Means of delivery:**

*All Personally Identifiable Information (PII) in this system is taken from the individual's OPF or employment history.*

#### 14. Data Controls and Security:

*Physical:*

*Paper-based information is stored in the Administration safe and locked filing cabinets, with a key secured by the Director of the OSA.*

*Technical:*

*Access to this database is assigned on the basis of job duties and administrative need for access.*

*In the past year the Commission has taken strategic steps to improve the Commission Information Technology program to ensure that it is robust enough to serve the Commission as it continues to expand under the Postal Accountability and Enhancement Act of 2006.*

*Security is a major component of the Commission IT infrastructure. In 2008 the Commission retained a security consultant to perform an audit of security controls, recommend remediation steps, and assist Commission staff in closing the gaps by June of 2008. One work product resulting from the study was a Plan of Action and Milestones (POAM) to guide Commission staff through the implementation of recommended security controls.*

*The Commission has formalized a Security Policy and a working System Security Plan that are closely aligned with NIST 800-53 guidelines and OMB mandates. IT staff have installed state of the art network monitoring and intrusion detection systems. For example, the Sawmill suite of products enables monitoring of essential server logs and real-time notification. To comply with the Federal Desktop Core Configuration mandate, staff installed a centralized desktop management system called C5. A product called System Center Essentials keeps workstations and servers patched and secure. Commission employees have SSL encrypted Web access to the Commission Exchange server for more secure email. Staff installed an upgraded version of anti-virus software on both workstations and network servers. The Commission instituted secure, SSL encrypted Virtual Private Network (VPN) access to enable its Telework program. Finally, on April 7, 2008 the Commission deployed a new public website. The site was built from the ground up utilizing a multi-tiered architecture to provide a much greater level of security than the former website. The website utilizes SSL encryption through Entrust Certificates to provide a secure channel for filing online.*

*In summary, the Commission's IT security posture has significantly improved in 2008. The Commission IT infrastructure has grown, is more secure, more robust,*

*and serves the Commission well. Policies and procedures are in place. The IT staff has increased in number and capability through strategic outsourcing. They monitor security controls on a continuous basis and keep abreast of new technology. The Commission affirms it is following OMB and NIST standards for IT security.*

**15. Privacy Act Interface:**

*The Commission's Privacy Act rules can be found at 39 CFR Part 3003 and Privacy Act notices are available on its website at:  
<http://www.prc.gov/prc-pages/misc/privacy/default.aspx>*

**16. Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures:**

*The Commission has conducted a risk assessment. The data are collected with employment forms at the beginning and end of an employee's tenure with the Commission directly from the employees by Commission Human Resources staff within the Office of the Secretary and Administration. Potential risk exists in that a person collecting or with access to the data may inappropriately use the data.*

*As long as the database contains personally identifiable information and resides on the Commission's IT network, there is a potential risk of this data being inappropriately accessed. However, with the Postal Service's recently extending its individual HR transactional website, PostalEase, to Commission personnel and the removal of Social Security numbers from official personnel paperwork, the need for the Commission's maintenance of the Admin Database becomes less important. We are evaluating the necessity for its existence and its status within both the Commission's systems of records and its information systems.*

*The data are not shared outside of the Commission's Human Resources staff within the Office of the Secretary and Administration.*

*No further risks are identified by the adopted security measures.*

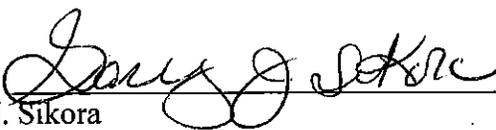
**17. Contact Point:**

*For information on this system, please contact Steven W. Williams, Secretary of the Commission at [prc-admin@prc.gov](mailto:prc-admin@prc.gov) or 202-789-6840.*

**18. Classification and Publication of Privacy Impact Assessment:**

Classification: Unclassified.

Publication: This document will be published either in full or in summary form on the Commission's Privacy Policy website page at:  
<http://www.the Commission.gov/the Commission-pages/misc/privacy/default.aspx>.

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