

## PEACE CORPS PRIVACY IMPACT ASSESSMENT

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**Peace Corps System Name and Acronym:** Financial Services System (FIN)

**Managing Office:** Office of the Chief Financial Officer

**PIA Approval date:** May 31, 2023

**1. Is this a new or revised electronic information system? If revised, describe revisions.**

This is a revised information system. Since the last PIA was created, FIN has begun transmitting data used to calculate cost of living adjustments to the Qualtrics Software as a Service (SaaS) solution. This data does not include PII.

If any question does not apply, state not applicable (N/A) and explain why.

**2. Identify who the Personally Identifiable Information (PII) is collected from:**

- Members of the public, including Peace Corps Volunteer applicants and interns
- Federal employees/federal contractors/Peace Corps Volunteers
- Both members of the public and Peace Corps personnel

**3. Legal Authority. Cite the legal authorities that permit and authorize the collection of this information by this IT system.**

Budget and Accounting Procedures Act of 1950; Federal Managers Financial Integrity Act; and the Office of Management and Budget (OMB) Circular A-127, The Peace Corps Act, 22 U.S.C. 2501, et seq., Debt Collection Improvement Act of 1996.

**4. Purpose. Explain the purpose of the system (e.g., nature and source).**

The information is being used for the following purposes:

- Make payments for goods/services/reimbursements/ allowances, mostly via EFT directly to bank accounts.
- Generate payroll for overseas staff.
- Provide W-2 and 1099 tax documents for earnings and payments.

- Record federal service history of volunteers for retirement purposes.
- Determine eligibility and amounts for severance payments (for overseas staff)
  - Record cash donations
  - Record debts and repayments
  - Collect data to determine cost of living adjustments

**5. List all forms of Personally Identifiable Information (PII) that is collected, maintained, or disseminated.** *(Examples include first name, middle name or initial, last name, alternate names, birth date, place of birth, Social Security Number (full or partial), personal telephone number, personal address, personal email address, residency during service or host family address, family member information or third person contacts, driver's license number, passport number, Peace Corps Volunteer number, other ID number, gender/gender preference, race or ethnicity, religious preference, marital status, military service status or military records, legal, security, or law enforcement information or status, disability information or status, financial information, educational information, IEP address, MAC address, biometrics, photograph, electronic Protected Health Information.)*

**VENDORS:** The following information is collected from vendors and retained in the Financial System for vendors who will receive payments from Peace Corps: First and last name, address (company address for a commercial vendor and a home address for a personal service contractor or individual), Social Security Number (SSN) or Tax Identification Number (TIN), bank account number, system-assigned supplier ID number.

**DONORS:** The following information is collected from financial donors to Peace Corps via the [Peacecorps.gov/donate](https://peacecorps.gov/donate) website and US Treasury's [pay.gov](https://pay.gov) portal: First and last name, home address, SSN, and system-assigned supplier ID numbers.

**VOLUNTEERS:** The following information is collected for volunteers who serve with Peace Corps: first and last name, address (Home of Record), SSN, date of birth, gender and marital status, bank/bank account (US and Overseas), country of assignment, email address, personal contact information/Power of attorney, emergency contact info (name/relationship/address/telephone number), system-assigned volunteer ID number.

The data is originally input into Peace Corps' DOVE system by the volunteer at the application stage and interfaced to the Financial Systems once the volunteer starts service. The overseas banking information is added to the record by Peace Corps staff on behalf of the volunteer into the Financial sub-system OdyWeb once the volunteer is assigned to a country.

**STAFF:** The following information is collected and retained for Peace Corps staff (except short-term contract staff): first and last name, address, SSN, date of birth, bank/bank account (US and Overseas), Peace Corps email address, salary information/job title, country of assignment, email address, personal contact information/Power of attorney, emergency contact info (name/relationship/home address/telephone number), system-assigned Supplier ID number

The data for overseas staff is collected from the staff member and entered into the Financial sub-system OdyWeb. The data for the US direct-hire staff is imported into the Financial System from a file retrieved from the National Finance Center, the federal payroll servicing agency for Peace Corps.

**6. Why is PII being collected (e.g., to determine eligibility)? Does the IT system collect PII directly from individuals, or from another system?**

The information is being used for the following purposes:

- Make payments for goods/services/reimbursements/ allowances, mostly via EFT directly to bank accounts.
- Generate payroll for overseas staff.
- Provide W-2 and 1099 tax documents for earnings and payments.
- Record federal service history of volunteers for retirement purposes.
- Determine eligibility and amounts for severance payments (for overseas staff).
- Record cash donations.
- Record debts and repayments.

PII is collected directly from the individual.

**7. Sharing and Disclosure.**

**a. Will the PII from this system be shared with another agency? If yes, list the agency, all types of PII that is shared, and why this is shared outside our agency.**

The following types of PII are shared with the following agencies:

- Office of Personnel Management (OPM) – Name, SSN, Home address
- Department of Treasury (USDT) & Department of State (DOS) – Name, Bank account number
- Internal Revenue Services (IRS) – Name, SSN

**b. Is the sharing pursuant to a Memorandum of Understanding, Computer Matching Agreement (CMA), or other type of approved sharing agreement with another agency?**

An Interconnection Security Agreement (ISA) exists between Peace Corps and OPM. The interconnection between the PC FIN and OPM is a one-way path and the data are encrypted using Pretty Good Privacy and transmitted to OPM via Secured File Transfer Protocol.

**8. Notice of the collection of information.**

**a. Do individuals have the opportunity to object or to consent to the particular use of their PII prior to collection?**

Yes

No

**b. If "Yes," describe the Privacy Act Statement (PAS) or notice provided to the individual prior to collection of his or her information. If "No," state the reason why individuals cannot give or withhold their consent. Identify if this is not applicable because information is obtained from an existing information system or source.**

N/A. The personal information that is maintained in FIN is required for the processing of payments, collection, and personnel transactions. This information comes from feeder systems (DOVE and NFC) and not directly from the individual.

**c. List any Peace Corps form(s) or federal form(s) used to collect PII for this system. Each PC form must have a Privacy Act Statement.**

N/A.

**d. Provide the OMB Control number and the agency number for the collection if this collection is covered by the Paperwork Reduction Act (PRA).**

N/A.

## **9. Security.**

**a. What administrative, technical, and physical security safeguards/controls are in place to protect the PII?**

### **ADMINISTRATIVE CONTROLS**

The access controls to the financial systems follow the least privileged methodology. The least privileged methodology is a security principle that limits users and system access rights to the minimum necessary to perform their job or tasks. This means that users or system components are given only the permissions required to complete their intended functions, and no more. By limiting access rights, the least privileged methodology reduces the risk of unauthorized access, data breaches and other security threats that could result from excessive permissions. All user access is provided according to the minimal access to data and system functionality in order to perform their job functions. As such, each user must have proper approval from their supervisor and other process owners, if required, for access to a set menu of responsibilities specific to their job role. Access to view or update the sensitive information for vendors, volunteers, and staff is limited to those who are required to view this to perform their jobs.

## **TECHNICAL CONTROLS**

PII data has been limited within the financial systems to only those sub-systems that require the data. Only two of the five (5) sub-systems (Odyssey and OdyWeb) contain PII data beyond name.

Access to the Financial Systems requires users to be logged on to the Peace Corps network. In addition, the user must be assigned system access, and must authenticate to specific applications with a username and password.

PII stored on the FIN system is protected by the physical security controls in place at the colocation (COLO) data center. The physical security controls include perimeter fencing, perimeter monitoring by security personnel at regular intervals, and alarmed entry/exit access points etc.

### **b. Has a system security plan been completed for the information system?**

Yes, it was completed on March 15, 2023.

### **10. Privacy Act System of Records. Identify the System of Record Notice (SORN) that covers this IT system, or state if a SORN will be created under the Privacy Act, 5 U.S.C. 552a.**

PC-22, Financial Management System

### **11. Records Retention and Disposition. Identify the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system, or for the records maintained in the system, as well as the record retention instructions.**

- NC1-362-83-01/1a – cut off when Volunteer leaves service. Destroy 7 years after cutoff. (volunteer payroll/payment records)
- DAA-0490-2015-0004-0001, Cut off at end of service, destroy 30 years after cutoff (PSC contracts – should be paper only as per CFO-ACM)
- DAA-GRS-2013-0003-0004) [GRS 1.1, item 030] cut off when asset is disposed of, destroy 2 years after cutoff (property/assets)
- DAA-GRS-2013-0003-0001) [GRS 1.1, item 010] – destroy 6 years after final payment or cancellation (financial transactions)
- DAA-GRS-2016-0013-0001) [GRS 1.1, item 001] – Destroy when 3 years old. (financial reporting)
- DAA-GRS-2013-0003-0001) [GRS 1.1, item 010] – destroy 6 years after collection (Donations)
- DAA-GRS-2019-0004-0001 [GRS 2.4, item 010] Destroy 3 years after calculating payroll (USDH payroll)
- DAA-GRS-2019-0004-0002 [GRS 2.4, item 030] Destroy 3 years after time and attendance/leave records submitted/approved.

- DAA-GRS-2016-0015-0002 [GRS 2.4, item 020] Destroy 4 years after tax withholding/adjustments documents submitted/approved.
- DAA-GRS-2016-0015-0004 [GRS 2.4, item 040] Destroy 56 years after pay period .
- DAA-GRS-2016-0015-0005 [GRS 2.4, item 050] Destroy 4 years after wage and tax statements (W-2) documents submitted/approved/superseded.