

PEACE CORPS PRIVACY IMPACT ASSESSMENT

Peace Corps System Name and Acronym: Persons Employed and Engaged with Peace Corps Systems (PEEPS)

Managing Office: Office of the Chief Information Officer (OCIO)

PIA approval date: September 21, 2023

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

Workday is a new Electronic Information System that will replace PTS (Personnel Tracking System) for the Agency.

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.

22 U.S.C § 34. 2501(a) et seq., The Peace Corps Act of 1961

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

The purpose of the PEEPS project is to retire the existing PTS application and replace PTS' primary functionality. This project will migrate active and all historical data from Person Database into Workday. Workday is a commercial off the shelf (COTS) Human Capital Management (HCM) Software as a Service (SaaS) Platform meeting all Federal security and privacy requirements under the Federal Risk and Authorization Management Program (FedRAMP), including IT Accessibility in compliance with Section 508 of the Rehabilitation Act, which will facilitate improved staff data onboarding, tracking, maintenance, offboarding, and record-keeping.

Workday will contain current and historical information on all positions, types of employments, tours of duty, staff physical locations, staff transfer actions and Front-End System Interface (FESI)-related Personally Identifiable Information (PII) data. The

system maintains the structure of current supervisors and their direct reports, Agency offices, hierarchal structure, and Headquarters (HQ) rooms. Workday will replace PTS as the primary Information Technology (IT) system for on- and off-boarding all Peace Corps personnel as well as for staff transfers actions. Workday will replace PTS serving as the authoritative source of data for Staff Directory, Agency financial systems, asset management system, Microsoft Identity Management (MIM), Active Directory, Track-It, Peace Corps Emergency Notification System (PCENS), Exchange, Agency Customer Relationship Management (Agency CRM).

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, IP address, MAC address, biometrics, photograph, electronic Protected Health Information.)*

PEEPS will include the following PII: First name, middle name or initial, last name, nick name, birth date, Social Security Number (full), national ID number or equivalent, staff person ID number, pay grade/step, duty station code, service start/end dates, photograph, Peace Corps Volunteer (PCV) number [staff Returned Peace Corps Volunteers (RPCVs) and Peace Corps Volunteers Leaders (PCVLs)], personal address, residency during service or host family address, gender, race or ethnicity, marital status, military service status, personal telephone number, personal email address, disability information or status, and citizenship.

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

As a human capital management system and the PTS replacement for the Agency, Workday will collect PII as the Agency's source of personnel management. PII data is required to maintain Peace Corps staff records including on- and off-boarding processes, staff records while employed by the Agency as well as to maintain official and departmental hierarchy of Peace Corps. It serves also as an authoritative source of data to Staff Directory, Agency financial systems, asset management system, MIM, Active Directory, Track-It, PCENS, Exchange, Agency CRM. The data is collected via direct entry to Workday application by authorized personnel only [Staffing Analysts, Human Resource (HR) Liaisons and Country Desk Units (CDUs)].

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.

No.

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

Not Applicable (N/A).

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.

The individual cannot consent or object to the use of the PII entered into Workday because information is obtained via existing sources (OPM, Odyssey/Odyweb, and security onboarding documents). The business processes in the system use the PII to ensure that the individual who is entered is a unique person who has or has not been at Peace Corps before.

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.

Not applicable (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?

Workday Government Cloud (WGC) Software as a Service (SaaS), which received a FedRAMP authorization on 07/11/2022 at the FIPS-199 impact level of **MODERATE**. Please refer to the WGC FedRAMP authorization package (Package ID: FR2103344623) for details regarding the implementation of administrative, technical, and physical security safeguards/controls to protect PII. In addition to the protections inherited from WGC, role-based access controls, user auditing, multi-factor

authentication, internet protocol (IP) whitelisting, encryption technology, data masking, rules of behavior and mandatory security awareness training will be strictly enforced and monitored to safeguard PII.

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

The System Security Plan (SSP) is in development as part of the normal Authority to Operate (ATO) process.

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-18, Former Peace Corps Volunteers and Staff Database.

PC-36, Peace Corps Computer Systems Activity and Access Records.

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.

Records in the system are covered by DAA-GRS-2017-0007-0001, GRS 2.2, item 010, "Employee management administrative records."

Disposition: Temporary.

The collection of records is cut off when an employee or volunteer leaves service. Destroy 3 years after cutoff, but longer retention is authorized if required for business use.