

## PEACE CORPS PRIVACY IMPACT ASSESSMENT

---

**Peace Corps System Name and Acronym:** Peace Corps Microsoft 365 (PCMS365)

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

**PIA Approval date:** July 1, 2024

**PIA Expiration date:** July 31, 2027

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

New Information System

Office 365 Multi-Tenant & Supporting Services is a FedRAMP authorized (Package ID MSO365MT) cloud service offering (CSO) for enterprise collaboration, communication, and office productivity tools.

FedRAMP System Profile

Service Model: SaaS  
Deployment Model: Public Cloud  
Impact Level: Moderate

Business Use

Microsoft's Office 365 offers the collaboration tools required by enterprise level organizations. Office 365 combines Exchange Online, Teams, SharePoint Online, OneDrive, and Office ProPlus across all platforms and devices deployed in the organization, and meets enterprise-grade requirements for privacy, security, reliability, and manageability. The system is categorized as a moderate system. It supports global network to include remote offices and users and provides federated identity and collaboration.

The authorization boundary for PC MS365 consists of compute and storage hosted in the FedRAMP Authorized Microsoft Office 365 Multi-Tenant & Supporting Services (Package ID MSO365MT). Microsoft Office 365 interconnects with PC45 PCGSS located in an Equinix Data Center (known as Peace Corps CoLo). Microsoft 365 Commercial Cloud provides multiple components within the suite that is used for the following:

## 1. Office 365 Infrastructure (Hybrid Cloud)

Hybrid cloud architecture will be the path taken to migrate the agency to Office 365 and integrate cloud technologies and services into the existing on-premises infrastructure as part of the overall IT strategy. The required infrastructure elements to be accounted for to implement Office 365 are networking, identity, and security, including but not limited to the following components:

- AD FS
- AD DS
- AADConnect
- Firewall

## 2. Exchange Online

Delivers the capabilities of Microsoft Exchange Server as a cloud-based service. It provides users access to email (100gb mailbox per user), calendar, contacts, and tasks from PCs, the web, and mobile devices. It integrates fully with Active Directory, enabling administrators to use group policies, as well as other administration tools, to manage Exchange Online features across the environment.

## 3. Teams

Connects people for meetings and conversations anytime and from virtually anywhere. It gives users access to information about presence, and enables instant messaging, audio and video calling, rich online meetings, and extensive web conferencing capabilities.

## 4. Office Pro Plus

Provides the latest version of the Office desktop applications that the Peace Corps user community is familiar with, such as Word, Excel, and PowerPoint.

## 5. SharePoint Online, OneDrive, & Planner

SharePoint Online in Office 365 empowers people to share and work together, to inform and engage others across the agency, to transform business processes, and to harness collective knowledge. In addition, SharePoint provides capabilities to protect and manage data and to build custom solutions.

OneDrive is used to store and protect work files while accessing them across multiple devices with ease. OneDrive enables sharing files with business colleagues as needed and collaboration on Office documents together in real

time with the latest Office desktop, web, and mobile apps. Sync files to your local computer using OneDrive for Business sync clients.

Microsoft Planner is a team-work oriented tool that can be used in a variety of ways including team management, file sharing, and organization. Planner enables users and teams to create plans, assemble and assign tasks, share files, communicate, and collaborate with other users, and receive progress updates via various means. Microsoft planner is linked with Office 365 Group, meaning that it is possible for users to collaborate through the platforms. Each new plan created in Planner automatically creates a new Office 365 group.

**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.**

The Peace Corps Act (22 U.S.C. 2501 et seq.), as amended; FIPS 200, Minimum Security Requirements for Federal Information and Information Systems; NIST SP 800-18, Revision 1, Guide for Developing Security Plans for Federal Information Systems; the Records Management Act of 1950, as amended, 44 U.S.C. 31; Executive Order 14028 – Improving the Nations Cybersecurity (May 12, 2021); OMB Circular A-130, Managing Information as a Strategic Resource; OMB Circular M-24-4, Fiscal Year 2024 Guidance on Federal Information Security and Privacy Management Requirements; NIST SP 800-82, rev.3 - Guide to Operational Technology (OT) Security; OMB Circular A-130, rev. 4, Managing Information as a Strategic Resource (2021); OMB Circular M- 21-31, Improving the Federal Government’s Investigative and Remediation Capabilities Related to Cybersecurity Incidents (August 27, 2021).

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

Microsoft's Office 365 offers the collaboration tools required by enterprise level organizations. Office 365 combines Exchange Online, Teams, SharePoint Online, OneDrive, and Office ProPlus across all platforms and devices deployed in the organization, and meets enterprise-grade requirements for privacy, security, reliability, and manageability. The system is categorized as a moderate system. It supports global network to include remote offices and users and provides federated identity and collaboration.

**5. List all forms of Personally Identifiable Information (PII) that is collected, maintained, or disseminated.**

PCMS365 cloud service supported applications may contain PII that is collected, maintained or disseminated, to include, but not limited to; Social Security Number, Passport Information, Vehicle Identifiers, Credit Card Number, Name, Date of Birth, Place of Birth, Home Address, Telephone Number, Financial Information, Medical Information, Employee Information, Gender, Age, Race/Ethnicity, E-mail Address, PIV Card Information, User ID, Education Records, Employee Performance Plans.

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

PCMS365 does not collect PII directly from individuals. PCMS365 processes, maintains, and stores PII collected by PCGSS via the system interconnection with the PCGSS. The Peace Corps is using Microsoft's Office 365 to facilitate collaboration among agency users.

**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, the information the PCMS365 System collects will not be shared with another agency. However, Peace Corps users may share PII using M365 tools such as Outlook if authorized to do so according to the routine uses published on the Peace Corps privacy webpage and published in the *Federal Register*. All Peace Corps users are responsible for protecting PII from unauthorized disclosure using M365.

**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.**

Not applicable. The PCMS365 does not operate as a Privacy Act system of records and is not intended to collect PII directly from individuals because information is obtained from an existing information system or source. The PCMS365 system is only the storage medium for Peace Corps systems. PCM365 may maintain or process PII that was obtained by other Peace Corps systems or programs. Peace Corps ensures that the forms or systems collecting this PII display the appropriate Privacy Act Statement in accordance with the Privacy Act of 1974, as amended. The PAS provides formal notice to individuals of the authority to collect PII, the purpose for collection, intended uses of the information and the consequences of not providing the information.

**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).**

Not applicable (N/A)

**9. Security.**

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

PCMS365 is required to follow the NIST SP 800-37, Rev.2 Risk Management Framework for Information Systems and Organizations. PCMS365 is continuously subjected to the RMF Prepare, Categorize, Select, Implement, Assess, Monitor and Authorize tasks. In addition, PCGSS follows Manual Section 542, Information Security Program.

PCMS365 will undergo an annual security assessment of administrative, technical, and operational security controls derived from NIST SP 800-53. Rev. 4 Security and Privacy Controls for Federal Information Systems and Organizations. Peace Corps expects to migrate to NIST SP 800-53. Rev. 5 in January 2025. Using the NIST SP 800-53 Rev. 4 Assessing Security and Privacy Controls in Federal Information Systems and Organizations, the authorized users will use the recommended methodology to examine, interview, and test its systems. Peace Corps selected moderate security controls are assessed by an independent third party to validate that the security controls are in place and operating as intended.

PCMS365 is a FedRAMP Moderate Cloud Service Offerings (CSO). Infrastructure Services administrators and security personnel review FedRAMP security packages and configure, implement, and test customer responsible security controls prior to being granted an Authority to Use (ATU) / Authority to Operate (ATO) from the Authorizing Official (AO).

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

PCMS365 has a current System Security Plan (SSP) with an expected approval date of July 30, 2024, that is reviewed and approved by the AO or designated representative prior to plan implementation. The PCMS365 ISSO updates the SSP to address:

1. changes to the information system/environment of operation;
2. problems identified during plan implementation;
3. problems identified during security control assessments.

**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.**

OPM/GOVT-1, General Personnel Records.  
OPM/GOVT-10, Employee Medical File System Records.  
PC-3, Contractors and Consultants Files.  
PC-11, Personal Services Contracts.  
PC-17, Peace Corps Volunteer Applicant and Service Records System.  
PC-18, Former Peace Corps Volunteer and Staff Database.  
PC-26, Peace Corps Computer Systems Activity and Access Records.  
PC-36, Personnel Accountability 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.**

Microsoft 365 is a comprehensive suite of productivity and collaboration tools that enable users to create, communicate, collaborate and store their work in a secure cloud environment. The records created, shared and stored in any component of Microsoft 365 are governed by the records management policies approved in Peace Corps Manual Section 892.

Specific Microsoft 365 components and content/record types, including those that currently have an approved disposition authority, include:

**Email (Exchange Online):** GRS-6-1-0490-2023-0001. All Peace Corps Senior Capstone Officials emails are permanent; cut off upon exiting Peace Corps;

retain for 15 years and transfer to NARA. All other Peace Corps staff emails are temporary; cut off upon exiting Peace Corps; retain for 7 years and then delete

**Infrastructure elements** necessary to implement Office 365 including networking, identity, and security, are covered by numerous NARA approved Peace Corps specific and General Records Schedule (GRS) disposition authorities (see MS892 Appendices A and B for most current list of all approved dispositions).

**Planner** is an organizational tool for tracking and managing Peace Corps staff activities. Planner and content are not currently scheduled at this time by Peace Corps.

**OneDrive:** this is the personal storage location for Peace Corps staff. No agency records are to be stored on OneDrive (MS892) and content is considered by the Peace Corps Records Management Office to be 'non-record' which is not managed by the agency. OneDrive and content is not currently scheduled by Peace Corps.

**SharePoint Online (SPO):** SPO hosts the "Digital Records Management Center-Records Repository" (DRMC) which is the approved location for storage of official Peace Corps records (MS892). The DRMC contains a wide range of agency records, and those records are covered by numerous NARA approved disposition authorities (see MS892 Appendices A and B for most current list of approved dispositions). SPO itself is not currently scheduled by Peace Corps.

**Teams:** is a collaborative tool that allows Peace Corps staff to meet, chat, and collaborate online. Chats created on Teams by Peace Corps staff are covered by GRS-6-1-0490-2023-0001. All Peace Corps Senior Capstone Officials chats are permanent; cut off upon exiting Peace Corps; retain for 15 years and transfer to NARA. All other Peace Corps staff chats are temporary; cut off upon exiting Peace Corps; retain for 7 years and then delete. Teams itself is not currently scheduled by Peace Corps.