

## PEACE CORPS PRIVACY IMPACT ASSESSMENT

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**Peace Corps System Name and Acronym:** Electronic Official Personnel File (eOPF)

**Managing Office:** Office of Human Resources

**PIA Approval date:** February 8, 2023

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

This is a new review of an existing system.

**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.**

U.S. Code of Federal Regulations (CFR) 5 Part 293.302, 5 CFR 293.303, 5 USC §§ 1104, 1302, 2951, 3301, and 4315; 3 CFR 1954-1958 Comp.; 5 CFR 7.2; Executive Order (EO) 9397, as amended; EO 9830 and EO 12107; 3 CFR 1943-1948 Comp.; 5 CFR Chapter 1 part 293 Personnel Records; and Peace Corps 22 CFR 2501 et seq.

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

The eOPF system is a web-based solution that allows the Peace Corps to comply with the Office of Personnel Management's regulation, 5 CFR Part 293, and OPM's Guide to Personnel Recordkeeping. It also allows the individual employee to access and review his or her key personnel records in electronic format.

**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.)*

PII includes: First name, last name, middle initial, birthdate, Social Security number (SSN), gender, home address, personal telephone number, full names of family members, SSNs of designated family members, birth dates of designated family members, gender of family members, Department of Defense (DoD) ID number if prior military service, veteran's preference points, benefits elections, salary, marriage date, death date, performance plans, performance awards, personnel actions, letters of recognition, and letters of reprimand.

**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 Official Personnel Folder (OPF) is a file containing the important records that document and cover a civilian federal employee's employment history. The Office of Personnel Management (OPM) and the Peace Corps' Office of Human Resources (OHR) use these records to document and make accurate decisions about employees' performances, rights, benefits, and entitlements throughout their careers. PII is listed on the forms and records associated with the individual. The electronic OPF requires the employee's full name and Social Security number to validate the record in the system.

**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 Office of Human Relations transfers the individual's eOPF to a gaining agency when an employee is hired by that agency. Folders cannot be transferred over to another federal agency until the individual is officially hired.

Peace Corps routine uses A – M apply to this system during the agency's custody of the records. The Office of Human Resources' System Owner may provide time-limited, read-only access to a particular employee's eOPF files for the purposes of background investigations for employment purposes.

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

No.

**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 Office of Human Resources determines what information or form is entered into the system. The individual can log in and access the eOPF account to review the information to ensure accuracy within the designated account. The individual has the option to consent to providing Personally Identifiable information and to collection when filling out and signing each form.

**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.**

SF 15, SF 39, SF 39A, SF 50, SF 52, SF 59, SF 61, SF 62, SF 75, SF 85, SF 85P, SF 85P-S, SF 86, SF 144, SF 144A, SF 182, SF 813, SF 1152, SF 1153, SF 1187, SF 1188, SF 2800, SF 2800A, SF 2801, SF 2801 PR, SF 2802, SF 2803, SF 2804, SF 2805, SF 2806, SF 2806-1, SF 2807, SF 2808, SF 2809, SF 2810, SF-2812, SF 2812A, SF 2817, SF 2818, SF 2819, SF 2820, SF 2821, SF 2822, SF 2823, SF 3100, SF 3101, SF 3102, SF 3103, SF 3104, SF 3104B, SF 3106, SF 3107, SF 3107 PR, SF 3108, SF 3109, SF 3110, SF 3111, SF 3112, SF 3116, PC-626A, PC-1577, PC-1578, PC-1336, PCHRM951.2.1, PC-642B, PC-1464, OF-306, OF-126, DG-30, DG-15, and certain Department of Defense (DoD) forms that may transfer with a former DoD employee or retired U.S. Service Member.

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

3206-0001, 3206-0005, 3206-0254, 3206-0230, 3206-0134, 3206-0261, 3206-0258, 3206-0156, 3206-0128, 3206-0134, 3206-0160, 3206-0262, 3206-0173, 3206-0172, 3206-0170, 3206-0228, 3206-0182,

**9. Security.**

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

Every system has certain privacy risks. The administrative, technical, and physical privacy risks include unauthorized access, unauthorized disclosure, and a risk that the individuals whose information is added to eOPF There are administrative, physical security, and technical safeguards in place to mitigate these risks.

**Administrative Controls:** Only authorized HR administrators have restricted access to the office, the designated system, and its information based on a need-to-know basis to fulfill official duties. The Office of Human Resources administrators assign user roles within its office to limit access to only those who have an official need to know to perform their duties. Authorized users are trained in the proper handling of personally identifiable information and their official responsibilities under the Privacy Act and Peace Corps technical governance for the rules of behavior. OPM has access to the data in the capacity as the administrator and service provider for the system.

**Technical Controls:** Access controls and user account authentication mechanisms are used in securing the data. Computer access requires a Personal Identity Verification (PIV) Badge and appropriate credentials. Access to the eOPF network requires multifactor authentication. The individual employee can access the assigned eOPF by logging in online using an OPM-assigned username and password, with read-only access to the assigned eOPF. The eOPF is stored electronically in a secure central cloud-based repository, with role-based security for access to the records. The eOPF provides an audit trail for all access and user activity. The eOPF electronic records are regularly backed up to a cloud server, providing disaster recovery to assure continuity of operation. Security measures are in place specifically to meet FISMA Moderate and FedRAMP Moderate requirements. OPM encrypts the transmission of data using Public Key Infrastructure (PKI) encryption. The system eOPF is compliant with the Federal Information Security Management Act (FISMA). The Federal Information Processing Standard (FIPS) 199 security impact category for this system is moderate.

**Physical Controls:** The facility has security guards at the entrance; badge access is required for entrance into the building; cameras are in place, and the office door is locked, requiring pre-approved electronic badge access.

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

Yes, the Authority to Use (ATU) for OPM's eOPF was granted on July 28, 2017.

**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-2, Employee Performance File System; and OPM/GOVT-3, Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions, and Termination of Probationers.

**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.**

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 retention instructions. The Peace Corps maintains the electronic records for approximately 30 days after separation, and up to 6 month is there is an involuntary separation.

DAA-GRS-2017-0007-0004 (GRS 2.2/040):  
Official Personnel Folder (OPF)/electronic OPF (eOPF). The Official Personnel Folder (Standard Form 66) or its approved electronic equivalent documents an individual's employment history.

Long-term records. Records of separated employees saved to the "permanent" folder in the eOPF or filed on the right side of the hardcopy OPF.

Exclusion: OPFs for employees separated prior to December 31, 1973. It is the responsibility of OPM to schedule these records.

Retention: OPM maintains official eOPF "Temporary. Destroy when survivor or retirement claims are adjudicated or when records are 129 years old, whichever is sooner, but longer retention is authorized if required for business use."

DAA-GRS-2017-0007-0005 (GRS 2.2/041):  
Short-term records. Records of separated employees saved to the "temporary" folder in the eOPF or filed on the left side of the hardcopy OPF. Exclusion: USCIS Form I-9 and performance related records. See item 060 of this schedule for I-9 Forms and items 070, 071, 072, and 073 for disposition of temporary performance-related records.

Retention: Temporary. Destroy when superseded or obsolete, or upon separation or transfer of employee, whichever is earlier.

DAA-GRS2017-0007- 0006 (GRS 2.2/050):  
Notifications of personnel actions.  
Copies of Standard Form 50, documenting all individual personnel actions such as hiring, promotions, transfers, and separation. Includes chronological files, fact sheets, general correspondence, and forms about pending personnel actions maintained by agency Human Resources offices.  
Exclusion: SF-50s filed in the OPF. Items 040 and 041 of this schedule cover these records.

Retention: Temporary. Destroy when business use ceases.