AmeriCorps
Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information system:	FedHR Navigator
1-2	System Identifier (3 letter identifier):	
1-3	Unique Investment Identifier (Exhibit 53):	
1-4	Office or entity that owns the system:	Office of Human Capital
1-5	Office or entity that manages the system:	Economic Systems (EconSys)
1-6	State if the system is operational or provide the expected launch date:	System is operational (Internal OHC modules only). New modules expected to launch by the end of October 2022.
1-7	System's security categorization:	Moderate
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	2/21/2022-3/1/2022 SAR (Security Assessment Report).
1-9	Approximate number of individuals with PII in the system:	Currently, there are approximately 800 AmeriCorps employees with PII in FedHR Navigator

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)			
	Role	*Signature*	*Date*
3-1	System Owner:		
3-2	Office of General Counsel:		
3-3	Chief Privacy Officer:		
3-4	Chief Information Security Officer:		
3-5	Senior Agency Official for Privacy:		

4- PIA HISTORY	
4-1	**State whether this is the first PIA for the system or an update to a signed PIA.**
	New PIA
4-2	**If this is an update, describe any major system changes since the last PIA.** **If this is the first time a PIA is being completed, write <u>Not Applicable</u>.**
	Not Applicable

5- SYSTEM PURPOSE	
5-1	**Describe the purpose of the system.**
	FedHR Navigator is a commercial off the shelf (COTS) tool, a HR system that automates all aspects of federal human resources management. The HR tools and utilities of FedHR Navigator are tailored to the needs and requirements of the U.S. federal government, and features specialized tools including retirement benefits calculator and position description and position management repository which can be integrated with other systems. The system supports talent acquisition, position management and classification, performance management, awards, personnel actions, benefits, retirement, separation, employee and labor relations, and workforce planning. Its position management tool has reporting capabilities which allow HR to have access to position data and support position management business processes; its personnel actions tool has an ability for managers to request personnel actions including position changes through the tool; and its retirement management tool enhances its Retirement Calculator solution to support employee access and automatically populate payroll data in the tool.

To automate the HR process and significantly improve the HR process efficiency, the Office of Human Capital (OHC) of AmeriCorps procures FedHR Navigator as a Software as a Service (SaaS) from the Economic Systems Inc. OHC currently uses the retirement solution of FedHR Navigator. The Position Management, Personnel Action Processing, and Retirement Calculations and Employee Self-Service modules are in the implementation phase.

The system leverages Amazon GovCloud as Infrastructure as a Service Provider (IaaS) provider and is hosted by Amazon Web Services (AWS). Both FedHR Navigator and Amazon GovCloud are FedRAMP certified. |

6- INVENTORY OF PII	
6-1	**Provide a list of all the PII included in the system.** .

- Social Security number
- Truncated or Partial Social Security Number
- Date of Birth (Day, Month, Year)
- Personal Email Address
- First Name and Last Name
- Education Information
- Health Plan Beneficiary Number
- Employee Identification Number
- Personal Files
- Home Address
- City or County of Birth and Zip Code
- Military Service Information
- Resume or Curriculum Vitae
- Ethnicity
- Race
- Gender
- Employment Information

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM

7-1	**Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.**
	The categories of individuals include Federal employees and contractors who supports the system.
	Currently, the PII of approximately 800 Federal employees of AmeriCorps is handled by the system.
	The system administrator's credential of approximately 10 contractors of OHC is stored in the system.

8- INFORMATION IN THE SYSTEM

8-1	**For each category of individuals discussed above:**
	  a. **Describe the information (not just PII) collected about that category.**
	  b. **Give specific details about any PII that is collected.**
	  c. **Describe how the information is used.**

When a new federal employee of AmeriCorps gets onboard, the individual is required to fill in standardized forms issued by the United States Office of Personnel Management (OPM) for the purpose of payroll, benefits, tax reporting and other personnel managements. Employees receive and submit the forms via USAStaffing during the onboarding process. OHC takes the information from the forms and enters the data into the system of AmeriCorps Payroll Provider, the National Finance Center (NFC), to create the employee's personnel record. OHC staff then import the data from NFC to FedHR Navigator to process and calculate retirement estimates, service computation dates, deposit information, and process personnel actions.

The information initially collected from the individual include the PII of the individual and other information required in the forms. This information includes but may not be limited to: Social Security Number, truncated or partial Social Security Number, date of birth (day, month, year), personal email address, first name and last Name, education information, health plan beneficiary number, employee identification number, personal files, gender, ethnicity, race, disability status, veteran status, home address, city or county of birth and zip code, military service information, Resume or Curriculum Vitae, nationality, employment information, business phone or fax number, business mailing address, business email address, tax, leaves, health insurance options, base salary, salary history, life insurance information, health insurance information, retirement plan information, thrift saving plan information, position office, locality, employee grade, employee pay plan, and work schedule, user group, and user access expiration date.

9- COLLECTIONS OF PII INTO THE SYSTEM	

9-1	Describe for each source of PII in the system:
	    a. The source.
	    b. What comes from that source.
	    c. How the PII enters the system.

	The sources of the PII are the on-boarding federal employees who on the onset of their federal career complete the onboarding forms in USA Staffing and the information retrieved from NFC.
	
	These onboarding forms include:
	    • AD 349 Employee Address form
	    • Fast Start Direct Deposit form
	    • Federal Tax Withholding Allowance Certificate
	    • State Withholding Tax Form (Varies by state if applicable)
	    • SF-2809 - Employee Health Benefits Enrollment
	    • SF-2810 - Notice of Change in Federal Employee Health Benefits Enrollment
	    • TSP-1 - Thrift Savings Plan Election Form
	    • SF-256 - Self-Identification of Disability
	    • SF-181 - Ethnicity and Race Identification

	• USAS USS-1 - Uniform Service Status Code Information • SF-2817 - Federal Employees' Group Life Insurance Election • USAS EDU-01 - New Employee Education Data Form • Form I-9 - Employment Eligibility Verification • SF 144 - Statement of Prior Federal Service OHC personnel retrieve the information that the on-boarding federal employee enters in the onboarding forms and provide it to NFC. All the data including PII processed by NFC are then retrieved and uploaded by OHC staff into FedHR Navigator bi-weekly via a template import process. The OHC staff use this information to compute retirement estimates, service computation dates, deposit totals and process personnel actions.
9-2	**If any PII comes directly from the individual, describe the privacy controls in place. If all PII comes from a secondary source, write <u>Not Applicable</u>.**
	When a new federal employee gets onboard, the individual is required to fill in many OPM forms. Each OPM form has a Privacy Act Statement that provide notice to the individual explaining why OPM is requesting the information on that form, the relevant authority and purpose, and the routine use of the information requested. To ensure the transparency of the privacy practice of the federal governments and appropriately inform the federal employees of their rights under the Privacy Act of 1974, as amended, OPM has published United States government-wide System of Records Notice (SORN) including OPM GOVT-1 General Personnel Records and OPM GOV-2 Employment Performance File System. In addition, AmeriCorps also publishes Employee Pay and Leave Record Files – Corporation -1, and the Employee and Application Records Files – Corporation -5 System of Records notices to provide notification and transparent information to its federal employees about the PII creation, collection, use, processing, dissemination, disclosure and disposition, the individuals' rights under the Privacy Act of 1974, as amended, the processes for the individual to access and amend their PII in the system of records, and the data privacy and security safeguard and controls that AmeriCorps has put in place. This FedHR Navigator PIA provides further details about the information handled by the system, the specific data activities of the FedHR Navigator, the data privacy practices of AmeriCorps and the data security measures that have been implemented in FedHR Navigator. The PII that FedHR Navigator handles is necessary for the purposes of retirement calculation and other personnel managements as identified in both the purpose statement of this PIA and the system of record notices.

9-3	**If PII about an individual comes from a source other than the individual, describe:**
	     a. **Why the PII is collected from the secondary source.**
	     b. **Why the PII from the secondary source is sufficiently accurate.**
	     c. **If/how the individual is aware that the secondary source will provide their PII.**
	 If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.	

	Not Applicable	
9-4	**If any collections into the system are subject to the Paperwork Reduction Act (PRA), identify the Office of Management and Budget (OMB) Control Number for the collection. If the system does not implicate the PRA, write <u>Not Applicable</u>.**	
	Not Applicable	
9-5	**If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.**	
	AmeriCorps has contract with Economic Systems, Inc. The vendor has access to the information in the system solely to support the delivery of retirement software and service. AmeriCorps has service contract with NFC. NFC provides the degree of protection (administrative, technical, and physical safeguards) for the payroll/personnel and other data as prescribed by the Privacy Act of 1974, 5 U.S.C. Section 552a, as amended. AmeriCorps' approval of the Inter-Agency Agreement with NFC authorizes NFC to release payroll or personnel data in accordance with the provisions of the Freedom of Information Act/PA.	

10- SYSTEM ACCESS	

10-1	**Separately describe each category of individuals who can access the system along with:**
	     a. **What PII they can access (all or what subset).**
	     b. **Why they need that level of access.**
	     c. **How they would request and receive that access.**
	     d. **How their access is reduced or eliminated when no longer necessary.**

	One AmeriCorps employee and two AmeriCorps Contractors on OHC's benefits and retirement team currently have access to FedHR Navigator and the PII in the system to perform their job duties.

There are currently two roles for the system: Administrator and Specialist. Only one OHC user currently has an Administrator role. Based on the need-to-know and least privilege principles, the Administrator can grant new OHC contractors or employees the access to the system. Employee information is only added into the system when OHC received a request for Service Computation Date (SCD) calculations or other retirement related requests.

After the implementation of new modules is completed, all employees across the agency will have access to FedHR Navigator. Employees outside of OHC will be able to access their own PII. OHC staff will have role-based access to PII based on their designated role in accordance with AmeriCorps standards and access control requirement.

OHC staff, Budget, Department Heads, and Hiring Managers need different level of access based on their assigned tasks in the system. OHC staff need to process personnel action, retirement, benefits, and AskHR requests. Budget needs to review pay impacting actions. Department Heads need to approve personnel actions submitting by Hiring Managers. Hiring Managers need to submit personnel actions for their staff and office hiring needs. OHC will grant access to an employee based on the employee's position at the agency and the office designation. For example, the Offices designate who the Hiring Manager(s) is in their office, so this role will be granted to Hiring Managers at the request of the director of that office.

FedHR Navigator will be updated on a bi-weekly basis. When an employee departs the agency and falls off the payroll list, their account will automatically deactivate and prevent the employee from accessing the system after their departure as soon as the bi-weekly feed is updated. However, the employee's network accounts with AmeriCorps are deactivated immediately once their offboard submission is processed.

11- PII SHARING	

11-1	**Separately describe each entity that receives PII from the system and:**
	    a. **What PII is shared.**
	    b. **Why PII is shared.**
	    c. **How the PII is shared (what means/medium).**
	    d. **The privacy controls to protect the PII while in transit.**
	    e. **The privacy controls to protect the PII once received.**
	    f. **Any agreements controlling that PII.**
	If PII is not shared outside the system, write <u>Not Applicable</u>.

	Not Applicable. Currently, FedHR Navigator is not connected with any external system.

12- PRIVACY ACT REQUIREMENTS

12-1	**If the system creates one or more systems of records under the Privacy Act of 1974:**
	    a. **Describe the retrieval that creates each system of records.**
	    b. **State which authorities authorize each system of records.**
	    c. **State which SORNs apply to each system of records.**
	If the system does not create a system of records, write <u>Not Applicable</u>.

	The records are retrieved by the federal employee's SSN and/or name.
	
	The SORNs that are applicable to the records in FedHR Navigator are:
	    1. OPM GOVT-1, General Personnel Records
	    2. OPM GOV-2, Employment Performance File System
	    3. AmeriCorps Employee Pay and Leave Record Files – Corporation -11
	    4. AmeriCorps Employee and Application Records Files – Corporation -5
	
	The legal authorities are:
	    5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.

13- SAFEGUARDS

13-1	**Describe the technical, physical, and administrative safeguards that protect the PII in the system.**
	OHC is taking phrased approach to implement FedHR Navigator. FedHR Navigator is hosted in Amazon GovCloud which is designed to host sensitive data in the cloud and meets the International Traffic in Arms Regulations (ITAR) and FedRAMP High baseline requirements. FedHR Navigator is designed following a defense in depth pattern, which provides multiple layers of protection around the data to enhance security and is subject to continuous monitoring. The level of privacy risk of FedHR Navigator system is moderate due to the sensitive data of federal employees it handles. The vendor EconSys currently runs the system and may obtain data of a sensitive and confidential nature on personnel solely to support the delivery of retirement software and services. To minimize the privacy risk that might arise from the supply chain, AmeriCorps signs contract with EconSys, with provisions that include federal security and privacy compliance requirements. EconSys is not permitted to engage in any activities that might release, distribute, or publish any information owned by AmeriCorps, or permit others to do so without the authorization of AmeriCorps. In addition, the vendor is required to establish necessary safeguards to protect all the information and ensure the training and supervision of its employees and

subcontractors concerning the restrictions. It is also required that EconSys staff with access to AmeriCorps data must undergo a background check conducted by EconSys. AmeriCorps has an Inter-Agency Agreement with NFC which is subject to the compliance requirements of the Privacy Act 1974 as amended and other relevant federal laws and regulations.

The current controls implemented that are commensurate with the moderate risk level of FedHR Navigator include but not limited to, establishing process to approve and authorize role-based access to the system, monitoring and ensuring the employees complete required annual security and privacy training, identifying and tracking the record retention schedules to ensure the retention and disposition of the records are properly handled, and posting privacy act notice on the FedHR Navigator website portal to notify AmeriCorps employees of the purpose of collecting their social security numbers, the routine uses and the relevant legal authorities.

FedHR Navigator is subject to the continuous monitoring by AmeriCorps information security assessment program and AmeriCorps' privacy program. AmeriCorps will regularly evaluate, assess and address any potential privacy risks that might arise from any changes to the system and appropriately safeguard its data and the PII of AmeriCorps employees.

14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
14-1	**Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.**
	The employees initially provide their PII via submission of the OPM forms they fill in. They are responsible for ensuring their PII is accurate, current, and complete before they submit the forms. NFC processes the information as what are provided to ensure the accuracy, currency, and completion. The data that is uploaded into FedHR Navigator from NFC will be entered via a template upload process. Information on the computed retirement estimates, dates, and deposits are shared via email with the respective employee by following proper protocols to encrypt emails that contain PII with the encrypt feature in Microsoft Outlook. If discrepancies are found in the data, corrective action is taken to process the correction through NFC and have the data updated in FedHR Navigator via the bi-weekly feed.
14-2	**Describe how an individual could view, correct, update, or ask to amend their PII.**
	The output of the data processed by the system will be shared with the respective employee. The employee data attributes will be visible to the employee in their FedHR Navigator profile. For example, if an employee receives a promotion, the action will be started in FedHR Navigator, completed in NFC, and the new salary will appear in FedHR Navigator via the bi-weekly upload two weeks later. If an employee notices

		their PII is entered incorrectly in their FedHR Navigator profile, they will contact OHC and OHC will take corrective action to process the correction through NFC. Not all data corrections are processed in the same way, OHC will identify the correction process based on the error identified.
14-3	**Describe how an individual could control what PII about themselves is included in the system or how it is used. Also describe how those decisions could affect the individual.**	
	The employee can update, amend or correct their information by contacting OHC and the OHC staff will make necessary changes via the NFC. Employees can submit questions to OHC, initiate a retirement request, and calculate their own retirement scenarios in the system. Hiring Managers can also submit personnel action requests for their employees in FedHR Navigator. The employee does have choice of not providing their PII in their onboarding forms, by giving up either certain benefits that must be processed by using required PII or giving up their job opportunities that cannot proceed further without required PII. AmeriCorps FedHR Navigator only processes information originally imported from NFC which the employee voluntarily provides for the purposes that they consent to. The use of the PII in FedHR Navigator follows the established protocol and is subject to the safeguard mechanisms that AmeriCorps develops.	

15- DATA RETENTION AND DESTRUCTION	
15-1	**Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.**
	The documentation stored and processed through FedHR Navigator must comply with the following record retention schedules: 1. GRS 2.2 Employee Management Records, which covers records Federal agencies create while carrying out the work of employee management: supervising employees, processing personnel actions, managing employee performance, and creating and maintaining personnel and volunteer service records. 2. GRS 2.4 Employee Compensation and Benefits Records, which covers records Federal agencies create while conducting agency payroll functions (items 010-061) and while managing specific programs that offer employees monetary or other tangible benefits (items 070 to 141).

16- SOCIAL SECURITY NUMBERS (SSNs)	

16-1	**If the system collects truncated or full social security numbers (SSNs):**
	    a. **Explain why the SSNs are required.**
	    b. **Provide the legal authority for the usage of the SSNs.**
	    c. **Describe any plans to reduce the number of SSNs.**
	If the system does not collect any part of an SSN, write <u>Not Applicable</u>.

	The SSN is required to identify a federal employee for tax report purpose and is used by OHC employees to properly manage and calculate the retirement benefit. The primary purpose of requesting the SSN is to properly identify the employee. Many employees have similar names and the furnishing of the SSN will enable NFC to identify employees across the agencies and to identify them when they transfer agencies. The legal authorities for the appropriate use of SSN are: Executive Order 9397, as amended by Executive Order 13478, Relating to Federal Agency Use of Social Security Numbers (November 18, 2008); the Privacy Act of 1974, as amended, 5 U.S.C. §552a; the Social Security Act, as amended. OHC ensures that information collected about individuals is limited to what is legally authorized and necessary and is maintained in a manner that protects against unwarranted intrusions upon individual privacy.

17- WEBSITES	
17-1	**If the system includes a website which is available to individuals apart from AmeriCorps personnel and contractors, discuss how it meets all AmeriCorps and Federal privacy requirements. If the system does not include a website, write <u>Not Applicable</u>.**
	Not Applicable

18- OTHER PRIVACY RISKS	
18-1	**Discuss any other system privacy risks or write <u>Not Applicable</u>.**
	Not Applicable