Privacy Impact Assessment

for

Forest Service Customer Relationship Manager New Hire Experience (CRM-NHE)

United States Department
of Agriculture

Privacy Impact Assessment

The completion of USDA Privacy Impact Assessments (PIAs) is mandated for any rulemaking, program, system, or practice that collects or uses PII under the authority of the E-government Act of 2002 (44 U.S.C. § 208(b)) and USDA DR 3515-002, Privacy Policy, and Compliance for Personally Identifiable Information (PII).

The PIA is designed to identify risk associated with the use of PII by a system, program, project or practice, and to ensure that vital data stewardship issues are addressed for all phases of the System Development Life Cycle (SDLC) of IT systems. It also ensures that security and privacy protections are built into an IT system during its development cycle. By regularly assessing privacy concerns during the development process, USDA ensures that proponents of a program or technology have taken its potential privacy impact into account from the beginning. The PIA also serves to help identify what level of security risk is associated with a program or technology. In turn, this allows the Department to properly manage the security requirements under the Federal Information Security Management Act (FISMA).

USDA DR 3515-002, Privacy Policy and Compliance for Personally Identifiable Information (PII).

Please note that the E-government Act of 2002 requires that a PIA be made available to the public. In order to comply with this requirement, PIAs will be published online for the general public to view. When completing this document please use simple, straight-forward language, avoid overly technical terminology, and write out acronyms the first time you use them to ensure that the document can be read and understood by the general public.

Guidance on how to complete the following PIA Questionnaire is available here.

Privacy Impact Assessment for the USDA IT System/Project:

NRE FS Customer Relationship Manager New Hire Experience (NRE FS CRM NHE)

Policy, E-Government and Fair Information Practices

Date PIA submitted for review:

October 30, 2023

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Abstract

This is the Privacy Impact Assessment for Customer Relationship Management (CRM) and New Hire Experience (NHE). Both systems are used to bring content center and new hire experience functions under one roof.

The E-Government Act requires agencies to conduct a PIA for systems or projects that collect, maintain, or disseminate information in identifiable form from or about members of the public. This excludes agencies, instrumentalities, or employees of the federal government. FS CRM NHE does NOT collect, maintain, or disseminate information in identifiable form, from or about members of the public. However, a PIA is being conducted as a best practice because CRM NHE stores and maintains PII on federal employees.

Overview

CRM is developed on Salesforce-GovCloud to bring content center functions for Forest Service employees under one roof. This application functions as a Case Management tool with capabilities across content centers for Human Resources Management (HRM), Anti-Harassment (HRC), Travel, Budget, and Finance to track cases through completion and to maintain records. Within CRM there is a Front-End Customer Portal for self-service ticket submissions, and knowledge management resources for customers (e.g., FAQs, quick reference guides, etc.) There is also data integration with the following Human Resource applications EmpowHR, ConnectHR, Paycheck8 and e-Safety. This data is used strictly for employee account management purposes within CRM NHE.

NHE is developed on Salesforce-GovCloud to centralize workflow tracking across all existing applications used by users across the NHE applications. NHE's purpose is to provide a dashboard on which a newly hired employee can track their on boarding status. This provides the employee with a seamless one stop experience to track their status as opposed to going to each application separately.

For both applications, MuleSoft is used as the integrator to move data from the existing applications to CRM and NHE. No data is stored in MuleSoft. The MuleSoft integration software resides on servers located at USDA DISC.

Section 1.0 Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

Authority to operate a consolidated interagency reservation service is derived from The Federal Lands Recreation Enhancement Act (FLREA) of 2005; 16 U.S.C. § 87.

1.2 Has Authorization and Accreditation (A&A) been completed for the system?

No This is a new system. The system was sent to the Department on 4/18/2024 for A&A concurrency review.

1.3. What System of Records Notice(s) (SORN(s)) apply to the information?

USDA/OP-1 Personnel and Payroll System for USDA Employees and *OPM GOVT-1 General Personnel Records*

1.4. Is the collection of information covered by the Paperwork Reduction Act?
No

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

2.1. What information is collected, used, disseminated, or maintained in the system/program?

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers:

☒	Social Security number	☐	Truncated or Partial Social Security number
☐	Driver's License Number	☐	License Plate Number
☐	Registration Number	☐	File/Case ID Number
☐	Student ID Number	☐	Federal Student Aid Number
☐	Passport number	☐	Alien Registration Number
☐	DOD ID Number	☐	DOD Benefits Number
☐	Employee Identification Number	☐	Professional License Number
☐	Taxpayer Identification Number	☐	Business Taxpayer Identification Number (sole proprietor)
☐	Credit/Debit Card Number	☐	Business Credit Card Number (sole proprietor)
☐	Vehicle Identification Number	☐	Business Vehicle Identification Number (sole proprietor)
☐	Personal Bank Account Number	☐	Business Bank Account Number (sole proprietor)
☐	Personal Device Identifiers or Serial Numbers	☐	Business device identifiers or serial numbers (sole proprietor)
☐	Personal Mobile Number	☐	Business Mobile Number (sole proprietor)
☐	Health Plan Beneficiary Number		

Biographical Information:

☒	Name (including nicknames)	☐	Gender	☐	Business Mailing Address (sole proprietor)

☐	Date of Birth (MM/DD/YY)	☐	Ethnicity	☐	Business Phone or Fax Number (sole proprietor)
☐	Country of Birth	☐	City or County of Birth	☐	Group/Organization Membership
☐	Citizenship	☐	Immigration Status	☐	Religion/Religious Preference
☒	Home Address	☐	Zip Code	☐	Home Phone or Fax Number
☐	Spouse Information	☐	Sexual Orientation	☐	Children Information
☐	Marital Status	☐	Military Service Information	☐	Mother's Maiden Name
☐	Race	☐	Nationality	☐	Global Positioning System (GPS)/Location Data
☐	Personal e-mail address	☐	Business e-mail address	☐	Personal Financial Information (including loan information)
☐	Employment Information	☐	Alias (username/screenname)	☐	Business Financial Information (including loan information)
☐	Education Information	☐	Resume or curriculum vitae	☐	Professional/personal references

Biometrics/Distinguishing Features/Characteristics:

☐	Fingerprints	☐	Palm prints	☐	Vascular scans
☐	Retina/Iris Scans	☐	Dental Profile	☐	Scars, marks, tattoos
☐	Hair Color	☐	Eye Color	☐	Height

☐	Video recording	☐	Photos	☐	Voice/ Audio Recording
☐	DNA Sample or Profile	☐	Signatures	☐	Weight

Medical/Emergency Information:

☐	Medical/Health Information	☐	Mental Health Information	☐	Disability Information
☐	Workers' Compensation Information	☐	Patient ID Number	☐	Emergency Contact Information

Device Information:

☐	Device settings or preferences (e.g., security level, sharing options, ringtones)	☐	Cell tower records (e.g., logs, user location, time, etc.)	☐	Network communications data

Specific Information/File Types:

☐	Personnel Files	☐	Law Enforcement Information	☐	Credit History Information
☐	Health Information	☐	Academic/Professional Background Information	☐	Civil/Criminal History Information/Police Record
☐	Case files	☐	Security Clearance/Background Check	☐	Taxpayer Information/Tax Return Information

Agency assigned numbers.

2.2. What are the sources of the information in the system/program?

The information source comes straight from the individual applying for a FS Job or who already works at FS.

2.2.1. How is the information collected?

Information is pulled from other USDA sites NFC Mainframe (Bear/102), EmpowHR, eTracker, USA Staffing, USAccess, Paycheck8, ePS, AgLearn, E-Safety, log.gov, and eAuthentication. If information is collected directly for CRM/NHE, it is via a case form, or an email generated from Salesforce.

2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

N/A

2.4. How will the information be checked for accuracy? How often will it be checked?

Users of CRM/NHE are responsible for checking for accuracy when inputting information into CRM/NHE or subsequent USDA systems.

2.5. Does the system/program use third-party websites?

No

2.5.1. What is the purpose of the use of third-party websites?

N/A

2.5.1.1. What PII will be made available to the agency through the use of third-party websites?

N/A

2.6. PRIVACY IMPACT ANALYSIS: Related to Characterization of the Information.

Follow the format below:

Privacy Risk: Privacy risks identified include unauthorized access to individual or group PII data, or aggregation of non-specific data that could be used for malicious intentions, for the purposes of fraud, extortion, loss of public trust, or other abuses.

Mitigation: Security controls have been implemented to further protect PII data processes and stored within the system. The system itself is protected by role-based access layers and positive

identification techniques such as multi-factor authentication to ensure that only people authorized to view information about others can do so.

Section 3.0 Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

The information in CRM is used for: case management capabilities across content centers for HRM, Anti-Harassment (HRC), Travel, Budget and Finance to track cases through completion and to maintain records.
The information in NHE is used for: tracking the new hire experience throughout 11+ NHE applications. Both the new hire and employees can track where a potential employee is within the process.

3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

No

3.3. PRIVACY IMPACT ANALYSIS: Related to uses of the information.

Follow the format below: are

<u>Privacy Risk</u>:
There is a risk that information within CRM/NHE will be used outside of its intended purpose. The potential related risk is loss or misuse of Personal Identifiable Information (PII) data. **<u>Mitigation</u>**:

NRE FS CRM NHE end users are required to take Information Security Awareness Training annually as well as acknowledge they have read and agree to the Rules of Behavior for using Government information systems. Both cover the use and handling of Personally Identifiable Information (PII). In addition, Forest Service Human Resource (HR) conducts quarterly Personally Sensitive Information (PSI) Stand Down Sessions for HR employees.   CRM NHE follows account management procedures and audits to ensure that only privileged users are allowed access to all the data contained in the system.

Section 4.0 Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

4.1. How does the project/program/system provide notice to individuals prior to collection?

U.S Government intention to collect PII data is declared in the System of Record Notice made publicly available within the U.S Federal Register, and at data collection points throughout the federal government. Employees of the Federal government consent to the collection and use of their information when they agree to work for the government. Notice is also given when the employee enters information into the payroll and benefits system.

4.2. What options are available for individuals to consent, decline, or opt out of the project?

Employees of the Federal government consent to the collection and use of their information when they agree to work for the government. Notice is also given when the employee enters information into the payroll and benefits system. There is no option for Federal employes to opt out, as the information is required to successfully obtain and maintain employment with the Federal Government.

4.3. PRIVACY IMPACT ANALYSIS: Related to Notice

Follow the format below:

Privacy Risk:

There is an associated risk with the notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information that the users will not understand the notice or where to find it. **Mitigation**:

The notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information is prior to login. We also give notice through our SORNs.

Section 5.0 Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

5.1. What information is retained and for how long?

6100 Personnel Operations/Statistical Reports - Temporary 2 years- DAA-GRS-2017-0007-0001 The information retained under Personnel Operations/Statistical Reports is HRM helpdesk tickets reports.

C 6130- Employment Actions Temporary 5 year- DAA-GRS-2017-0010-0010. The information retained under Employment temporary actions is information related to HRM Helpdesk ticketing and contains no PII.

5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

Yes. 6230 – Records Management – Intermediary Records (GRS 5.2/100 (DAA-GRS-2017-0003-0002).

5.3. PRIVACY IMPACT ANALYSIS: **Related to retention of information.**

Follow the format below:

Privacy Risk:

There is minimal risk associated with retention of information being retained longer than necessary. CRM NHE aligns with National Archive and Records Administration (NARA) requirements.

Mitigation:

FS has determined that the data retention periods and practices are adequate to safeguard PII while ensuring that mission critical data is available to support system restoration in the event of unplanned outages CRM NHE aligns with National Archive and Records Administration (NARA) requirements.

Section 6.0 Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

CRM NHE does not share any information with any areas within the Department. Information is only utilized internally with in the NRE Forest Service Human Resources and Budget and Finance business units.

6.2. PRIVACY IMPACT ANALYSIS: Related to internal sharing and disclosure.

Follow the format below:

Privacy Risk:
N/A

Mitigation:

N/A

6.3. With which external organizations (outside USDA) is information shared/received/transmitted?   What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

None

6.4. PRIVACY IMPACT ANALYSIS: Related to external sharing and disclosure.
Follow the format below:

Privacy Risk: N/A

Mitigation: N/A

Section 7.0 Redress

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.

7.1. What are the procedures that allow individuals to gain access to their information?

Data integration allows for individual's information to be prepopulated from the USDA National Finance Center. Individuals can also view their data by accessing the National Finance Center Employee Personal Page or by Office of Personnel Management (OPM) electronic Official Personnel Folder (eOPF). Human Resource systems utilizes limited personal information to conduct and complete your HR transactional needs. If your populated information needs to be updated or corrected contact your Forest Service Human Resource Department at 1-877-372-7248 option 2. For additional information on USDA Privacy Policy please visit https://www.dm.usda.gov/privacy/index.htm.

7.2. What are the procedures forcorrecting inaccurate or erroneous information?

In the event that the information in OPM eOPF or USDA National Finance Center prepopulated information is inaccurate, and individual is advised to contract the Forest Service Human Resource Department. A correction will have to be made at the system of record which will then repopulate the correct information. Human Resource systems utilizes limited personal information to conduct and complete your HR transactional needs. If your populated information needs to be updated or corrected contact your Forest Service Human Resource Department at 1-877-372-7248 option 2. For additional information on USDA Privacy Policy please visit https://www.dm.usda.gov/privacy/index.htm.

7.3. How are individuals notified of the procedures for correcting their information?

Individuals are advised prior to log in to contract the Forest Service Human Resource Department in the event that a correction is needed. The banner states "Human Resource systems utilizes limited personal information to conduct and complete your HR transactional needs. If your populated information needs to be updated or corrected contact your Forest Service Human Resource Department at 1-877-372-7248 option 2. For additional information on USDA Privacy Policy please visit https://www.dm.usda.gov/privacy/index.htm".

7.4. If no formal redress is provided, what alternatives are available to the individual?

N/A

7.5. PRIVACY IMPACT ANALYSIS: Related to Redress.

Follow the format below:

Privacy Risk: Due to data integration, there is a possibility that incorrect information will be loaded in NRE FS CRM NHE.

Mitigation:

Once the erroneous data is corrected the data integration will automatically update and have the corrected information in NRE FS CRM NHE.

Section 8 Auditing and Accountability

The following questions are intended to describe technical safeguards and security measures.

8.1. How is the information in the system/project/program secured?

PII is encrypted in CRM/NHE, access controls are in place to ensure only need-to-know individuals have access, and all users must authenticate through e-auth or login.gov to access CRM/NHE.

8.2. What procedures are in place to determine which users may access the program or system/project, and are they documented?

Each user in CRM/NHE has a limited and specific set of roles. Each role is defined such that it only gives access to the data needed for that role. Therefore, the definition of the role prevents a user from misusing the data.

8.3. How does the program review and approve information sharing requirements?

There are no significant risks associated with the internal sharing of PII data. All personnel accessing CRM/NHE PII data are cleared and trained annually on the proper handling and protection of PII data. The system itself is protected by role-based access layers and positive identification techniques such as multi-factor authentication to ensure only people authorized to view and act upon information about others can do so.

8.4. Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project?

All CRM/internal NHE users receive annual security awareness training that includes specific training regarding the protection of PII. Privileged users within NRE FS are required to take additional, more detailed security training commensurate with their access permissions.

Approval Signatures:

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