# AmeriCorps
# Privacy Impact Assessment (PIA)

| 1- GENERAL SYSTEM INFORMATION | | |
|---|---|---|
| **1-1** | **Name of the information system:** | SuccessFactors |
| **1-2** | **System Identifier (3 letter identifier):** | SCF |
| **1-3** | **Unique Investment Identifier (Exhibit 53):** | 485-000000014 |
| **1-4** | **Office or entity that owns the system:** | Office of Human Capital (OHC) |
| **1-5** | **Office or entity that operates the system:** | OHC/Office of Information Technology (OIT) |
| **1-6** | **State if the system is operational or provide the expected launch date:** | Operational |
| **1-7** | **System's security categorization:** | Low |
| **1-8** | **Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:** | An Interim Authorization to Operate (IATO) was issued on December 12, 2023. Previously SuccessFactors was part of the General Support System (GSS) of AmeriCorps. |
| **1-9** | **Approximate number of individuals with Personally Identifiable Information (PII) in the system:** | The profile and performance evaluation information of 700 AmeriCorps federal employees are maintained in SCF system. |

| 3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER) | | | |
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| | **Role** | ***Signature*** | ***Date*** |
| **3-1** | **Information 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:** | | |

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| 4- PIA HISTORY | |
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| 4-1 | **State whether this is the first PIA for the system or an update to a signed PIA.** |
| | This is the first PIA. Previously SuccessFactors was part of the General Support System (GSS). |
| 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 Not Applicable.** |
| | Not Applicable |
| 4-3 A | **State whether this is the annual review of a PIA.** |
| | Not Applicable |
| 4-3 B | **Describe any changes to the system, data activity, policies, procedures, any interrelating component and process, vendor, third parties, contracts and any required controls since last PIA.** |
| | Not Applicable |
| 4-3 C | **Describe objects and results of audit or tests (continuous monitoring).** |
| | Not Applicable |
| 4-3 D | **Certify and state "Completion of Review" if no change occurs.** |
| | Not Applicable |
| 4-4 | **If the system is being retired, state whether a decommission plan is completed and attach a copy.** |
| | Not Applicable |

| 5- SYSTEM PURPOSE | |
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| 5-1 | **Describe purpose of the system (or program, product, service)** |
| | Success Factors (SCF) is a cloud-based human capital management software application that supports core human resource (HR), payroll, talent management, HR analytics, workforce planning, and employee experience management. SCF includes a "performance module" that AmeriCorps uses to complete mid-year and year-end employee performance assessment and review. The employees would self-assess and submit their accomplishments of their federal work performance in SCF which would be reviewed, evaluated, and rated by their supervisors. The system will store the performance evaluation and rating information which would be used further by OHC to factor into personnel decisions such as raises, promotions or disciplinary actions.<br><br>The application is procured from vendor Carahsoft by the General Dynamics of Information Technology (GDIT) on behalf of AmeriCorps. |

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| 6- INVENTORY OF PII | |
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| **6-1** | **Provide a list of all the PII included in the system.** |
| | The name, gender, Employee Identification Number (EID) and business email address of AmeriCorps' federal employee are collected.<br><br>The employee's self-assessment, the supervisor's evaluation and adjustment are entered into the system to complete the process of performance evaluation. |

| 7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM | |
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| **7-1** | **Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.** |
| | The category of individuals whose PII is in the system includes:<br><br>AmeriCorps' federal employees: These individuals log into SCF to complete their mid-year and end-of-year performance evaluation forms. There are approximately 700 total individuals.<br><br>AmeriCorps federal employees' supervisors: These individuals log into SCF to review the mid-year and end-of-year performance evaluations submitted by their subordinates. Out of the approximately 700 federal employees, there are approximately 200 individuals assigned as supervisors. |

| 8- INFORMATION IN THE SYSTEM | |
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| **8-1 A** | **For each category of individuals discussed above:**<br>**Describe the information (not just PII) collected about that category and how the information is used.** |
| | SCF is used as a personnel performance management tool for AmeriCorps. The name, gender, Employee Identification Number, business email address, self-assessment of AmeriCorps federal employee and their supervisor's evaluation are collected and maintained in the system.<br><br>AmeriCorps provides all its federal employees with a URL to SCF website and the AmeriCorps ID for them to log in to SCF by using their username and password. Within the system, AmeriCorps employees are only able to access their own information and records. The supervisors are able to view information of their subordinates only.<br><br>The Work Force Relations (WFR) staff of the Office of Human Capital (OHC) or SCF site administrator are authorized to access the information within the system to process the performance evaluation. |
| **8-1 B** | **State whether the system derives new data, or creates previously unavailable data, about an individual via aggregation of information or other means. Explain why, how it is related to the purpose of the system, how it is used, and with whom it is shared.** |

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| | | Not Applicable |
| **8-1 C** | | **If the system uses commercial or publicly available data, explain why, how it is related to the purpose of the system, and how it is used.** |
| | | Not Applicable |
| **8-1 D** | | **Describe any application of PII redaction, mask, anonymization, or elimination.** |
| | | There is no PII redaction, masking anonymization or elimination. |
| **8-1 E** | | **Describe any design that is used to enhance privacy protection.** |
| | | Access controls and safeguards are in place to approve and grant access to the system to only AmeriCorps staffs who have a need to know. |

| **9- COLLECTIONS OF PII INTO THE SYSTEM** | | |
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| **9-1** | **Describe for each source of PII in the system:**<br>**a. The source.**<br>**b. What comes from that source.**<br>**c. How the PII enters the system.** | |
| | | The name, gender, Employee Identification Number (EIN) and business email address of AmeriCorps employees are derived from an OHC internal payroll roster called the Comp Data Report which is updated and uploaded into SCF each pay period.<br><br>The performance self-evaluation information is from the employees. The supervisors' evaluation of the employee is entered by the supervisors. |
| **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>.** | |
| | | The self-evaluation information comes directly from AmeriCorps federal employees. A Privacy Act Statement is posted at the log-in page of SCF, which provides information of the System of Record Notice that covers this system, the options that the individuals can exercise, their privacy rights, how their data privacy is protected, etc.<br><br>AmeriCorps upload the name, gender, EIN and work email address of AmeriCorps' federal employees into SCF to set up each employee's user account. The information is updated and uploaded bi-weekly (each pay period) from Comp Data Report that ensure all the new employee's information is appropriately captured and entered into SCF timely. |
| **9-3** | **If PII about an individual comes from a secondary source other than the individual, describe:**<br>**a. Why the PII is collected from the secondary source.**<br>**b. Why the PII from the secondary source is sufficiently accurate.**<br>**c. If/how the individual is aware that the secondary source will provide their PII.**<br>**If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.** | |

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| | | The EIN and work contact information is from the Comp Data Report generated by AmeriCorps OHC which documents the employee's information after onboarding.<br><br>The Comp Data Report is a roster of AmeriCorps personnel currently on payroll. The roster outlines information such as the employee's department, office, duty title, and pay grade. This information is utilized by both OHC and the SCF administrator on a need-to-know basis and is pulled from Insight Reporting, – a reporting system of the National Finance Center (NFC) which provides payroll service to AmeriCorps. The information is sufficiently accurate since the employees' basic identity information and most of the payroll information are provided directly by the employees and subject to constant reviews by both the employees and OHC staff who can timely adjust inaccuracies during the payroll handling process.<br><br>All individuals are aware that SCF maintains the information outlined above when their account is created. They receive a system generated email and their annual performance forms also have their position information that they can review. |
| **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 and effective date. 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>.** | |
| | | Not Applicable |

| **10- SYSTEM ACCESS** | | |
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| **10-1** | **Separately describe each category of individuals who can access the system along with:**<br>**a. What PII they can access (all or what subset).**<br>**b. Why they need that level of access.**<br>**c. How they would request and receive that access.**<br>**d. How their access is reduced or eliminated when no longer necessary.**<br>**e. Identify policies and procedure outlining roles and responsibilities and auditing processes.** | |
| | | The categories of individuals who can access the system are: 1) Individual employee. 2) Supervisors. 3) SCF administrators.<br><br>1) Individual Employee:<br>a. Individual employees can only see their own information in the system. Name, Gender, Employee Identification Number and Business Email are the only information displayed in SuccessFactors. |

b. Individual employees only need standard access in order to input accomplishments in the system for mid-year and end-of-year review and to sign their forms.
c. WFR creates new accounts based on new employee onboarding information on the Comp Data Report for each individual employee to access the system.
d. When an employee departs the agency, WFR is notified by either the supervisor via e-mail to the easmashelpdesk@americorps.gov or via OHC's separation report. The system administrator will be notified when an employee departs and disable the account immediately.
e. WFR provides SuccessFactors Job Aids to assist managers and employees in carrying out their roles and responsibilities in SuccessFactors. The job aids includes:
    - Mid-Year Job Aid for Employees
    - Mid-Year Job Aid for Managers
    - Year-End Job Aid for Employees
    - Year-End Job Aid for Managers
    - Admin Job Aid
    - Launching Forms in SuccessFactors – SOP (Review/Update in Process) How to Pull a Report in SuccessFactors – SOP (Review/Update in Process)

2) Supervisors:
a. Supervisors can see their direct report's information (Individual Employee's) and their own information in the system.
b. Supervisors need higher level access in order to access their direct report's information and to complete their mid-year form and end-of year appraisal.
c. WFR creates new accounts based on new employee onboarding information on the Comp Data Report. New supervisors will e-mail the easmashelpdesk@americorps.gov to request supervisory access.
d. When an employee departs the agency, WFR is notified by either the supervisor via e-mail to the easmashelpdesk@americorps.gov or via OHC's separation report. The system administrator will be notified when an employee departs and disable the account immediately.
e. WFR provides SuccessFactors Job Aids to assist managers and employees in carrying out their roles and responsibilities in SuccessFactors. The job aids includes;
    - Mid-Year Job Aid for Employees
    - Mid-Year Job Aid for Managers
    - Year-End Job Aid for Employees
    - Year-End Job Aid for Managers
    - Admin Job Aid
    - Launching Forms in SuccessFactors – SOP (Review/Update in Process)
    - How to Pull a Repot in SuccessFactors – SOP (Review/Update in Process)

3) SCF Administrators:

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| | | a. Only OHC WFR employees have administrative accounts in SuccessFactors. They can only access the information that is annotated in the system. This will include the employee's name, duty title, e-mail, supervisor, assigned office, hire date, Org code, duty location, type of form they are assigned to for end-of-year appraisal, as well as access to their past mid-year assessments and the end of year appraisals.<br>b. OHC WFR employees' level of access allows them to manage the performance management program and SCF system at AmeriCorps. They are responsible for creation of accounts, launch forms, updating employee information, pulling reports, and helping managers to route the forms through the system for completion.<br>c. When a new WFR Specialist onboards, they are trained on the system and the different admin level functions. Once their training is complete, they are granting a SuccessFactors account with admin level privileges.<br>d. When a WFR Specialist departs, one of the WFR Specialist overseeing the system will disable their account.<br>e. WFR provides SuccessFactors Job Aids to assist managers and employees in completing their roles and responsibilities in SuccessFactors. The first four job aids can be located on Workforce Relation's Performance Management SharePoint page:<br>o Mid-Year Job Aid for Employees<br>o Mid-Year Job Aid for Managers<br>o Year-End Job Aid for Employees<br>o Year-End Job Aid for Managers<br>o Admin Job Aid<br>o Launching Forms in SuccessFactors – SOP (Review/Update in Process)<br>o How to Pull a Repot in SuccessFactors – SOP (Review/Update in Process) |

| **11- PII SHARING** | | |
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| **11-1** | **Separately describe each entity that receives PII from the system and:**<br>**a. What PII is shared.**<br>**b. Why PII is shared** *(specify the purpose*)<br>**c. How the PII is shared (what means/medium).**<br>**d. The privacy controls to protect the PII while in transit.**<br>**e. The privacy controls to protect the PII once received.**<br>**f. PII sharing agreements (***describe if the agreement specifies the scope of the information sharing, the parties to the agreement, and the duration of the agreement*)<br>**g. Describe security and privacy clauses and audit clauses in the agreement or vendor (including third party vendors) contract.**<br><br>**If PII is not shared outside the system, write <u>Not Applicable</u>.** | |
| | | Not Applicable |

| 12- PRIVACY ACT REQUIREMENTS | | |
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| 12-1 | **If the system creates one or more systems of records under the Privacy Act of 1974:**<br>**a. Describe the retrieval that creates each system of records.**<br>**b. State which authorities authorize each system of records.**<br>**c. State which system of records notices (SORNs) apply to each system of records.**<br>**If the system does not create a system of records, write Not Applicable.** | |
| | | Records in SCF can be retrieved by using the name of AmeriCorps federal employee. The applicable SORN is OPM/GOVT–2 – Employee Performance File System Records. A Privacy Act Statement (PAS) is posted at the log-in page of SCF.<br><br>The legal authorities are: 5 USC Sections 1104, 3321, 4305, and 5405, and Executive Order 12107. |

| 13- SAFEGUARDS | | |
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| 13-1 | **Describe the data processing environments and the technical, physical, and administrative safeguards (including vendors') that protect the PII in the system.** | |
| | | The SCF system and its data privacy are protected through multiple layers of controls that AmeriCorps implemented for SCF and the general support system support environment that the system is in. The data that the system handles are encrypted both in transit and at rest in accordance with the standards set by National Institute of Science and Technology. AmeriCorps OHC and the service provider have identified and delineated roles and responsibilities for managing the system and user accounts, the access to the system and the data. All the data handling activities are conducted per the requirements of AmeriCorps privacy policy, this include, but not limited to, only authorized WFR staff of OHC can access the system as system administers, following OHC procedure, properly posting a Privacy Act Notice on the log-in web page of SCF, regularly updating the employee information in the system, having a system level Incident and Breach Response policy in place, etc.<br><br>In addition, all AmeriCorps staff involved in managing SCF system and its supporting system environment are required to receive on-boarding and thereafter annual security, privacy and record management training. Those who handle PII are required to complete role-based privacy training and role-based breach response training.<br><br>The system is subject to continuous monitoring and is appropriately configured to audit and log access to the system and PII, which allow AmeriCorps to take timely action to evaluate and response to more risks that might occur. |
| 13-2 | **Describe the technical, physical, and administrative measures that protect PII if the system is being retired.** | |
| | | Not Applicable |

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| **13-3** | **State if a system security plan and privacy plan is completed and the date of control verification.** |
| | The SCF security plan and privacy plan is completed is complete and addresses all NIST privacy controls required by AmeriCorps. The verification date is April 29, 2024. |

| **14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL** | |
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| **14-1** | **Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete, as well as the assurance procedure.** |
| | Other than the information that AmeriCorps federal employees directly enter into SCF, the other information is from the Comp Data Report, which is a roster of AmeriCorps' personnel currently on payroll. The roster outlines information such as the employee's department, office, duty title, and pay grade. This information is utilized by both OHC and SCF administrators on a need-to-know basis. This roster is pulled every two weeks with current complete information of the employees that the employees can review and ensure accuracy. |
| **14-2** | **Describe how an individual could view, correct, update, or ask to amend their PII.** |
| | All individuals are aware that SCF maintains the information outlined above when their account is created. Individuals are required to review their information for accuracy during their performance review. |
| **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.** |
| | Only information relevant to the performance review process is maintained in SCF system. The basic employment information about the employees is required and only used to identify the employees. The performance evaluation information of the employee is essential for the employee to continue their employment with AmeriCorps with a track record of meeting their position performance requirement. AmeriCorps does not use the information in SCF for any purposes that are not identified in the OPM/GOVT-2 Employment Performance File System of Records Notice. |
| **14-4** | **State if PII handling processes apply automation technology for decision making and describe the measures taken to eliminate risk to privacy interests.** |
| | Not Applicable |

| **15- DATA RETENTION AND DESTRUCTION** | |
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| **15-1** | **Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.** |
| | The applicable record retention is General Records Schedule 2.2: Employee Management Records, which covers:<br><br>1. Acceptable performance appraisals of non-senior executive service employees.<br>Disposition Authority Number: DM-GRS-2017-0007-0008.<br><br>2. Unacceptable performance appraisals of non-senior executive service employees. |

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| | | Disposition Authority Number: DM-GRS-2017-0007-0009.<br><br>3. Records of senior executive service employees.<br>Disposition Authority Number: DM-GRS-2017-0007-0010.<br><br>4. Performance records superseded through an administrative, judicial, or quasi-judicial procedure.<br>Disposition Authority Number: DM-GRS-2017-0007-0011. |
| **15-1** | **Identify the role and process to coordinate with the parties involved in record retention and disposition.** | |
| | | OHC is responsible for ensuring the record retention schedule is followed. Regarding the disposal of records, OHC and the system owner would coordinate with the SCF vendor to dispose of records. |

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

| **17- WEBSITES** | | |
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| **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** | | |
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| **18-1** | **Discuss any other system privacy risks or write <u>Not Applicable</u>.** | |
| | | Not Applicable |