

## AmeriCorps Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
<b>1-1</b>	<b>Name of the information system:</b>	NICE CXone
<b>1-2</b>	<b>System Identifier (3 letter identifier):</b>	NIC
<b>1-3</b>	<b>Unique Investment Identifier (Exhibit 53):</b>	485-000000017
<b>1-4</b>	<b>Office or entity that owns the system:</b>	ITCON Service
<b>1-5</b>	<b>Office or entity that operates the system:</b>	AmeriCorps
<b>1-6</b>	<b>State if the system is operational or provide the expected launch date:</b>	Operational
<b>1-7</b>	<b>System's security categorization:</b>	Moderate
<b>1-8</b>	<b>Date of most recent Security Assessment and Authorization (SA&amp;A) or why one is not required:</b>	October 22nd , 2024
<b>1-9</b>	<b>Approximate number of individuals with Personally Identifiable Information (PII) in the system:</b>	AmeriCorps Hotline estimated calls recorded 50,385 per year.



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

<b>4- PIA HISTORY</b>	
<b>4-1</b>	<b>State whether this is the first PIA for the system or an update to a signed PIA.</b>
	First PIA
<b>4-2</b>	<b>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>.</b>
	Not Applicable
<b>4-3</b>	<b>State whether this is the annual review of PIA.</b>
<b>A</b>	Initial Review
<b>4-3</b>	<b>Describe any changes to the system, data activity, policies, procedures, any interrelating component and process, vendor, 3<sup>rd</sup> parties, contracts and any required controls since last PIA.</b>
<b>B</b>	Not Applicable
<b>4-3</b>	<b>Describe objects and results of audit or tests (continuous monitoring).</b>
<b>C</b>	Not Applicable
<b>4-3</b>	<b>Certify and state "Completion of Review" if no change occurs.</b>
<b>D</b>	This is the first PIA for the system.
<b>4-4</b>	<b>If the system is being retired, state whether a decommission plan is completed and attach a copy.</b>
	Not Applicable

5- SYSTEM PURPOSE	
<b>5-1</b>	<p><b>Describe Purpose of the System (or program, product, service)</b></p> <p>The AmeriCorps NICE CXone (NICE) system is a Contact Center as a Service (CCaaS) solution provided by vendor ITCON Services, offering a wide range of customer service channels, including toll-free phone lines, live chat, and other methods. This system supports all AmeriCorps program customers, including AmeriCorps NCCC, AmeriCorps State and National, AmeriCorps VISTA, AmeriCorps Seniors, Americorps' alumni, prospective members and volunteers, and the public. The CCaaS features Automated Call Distribution (ACD), Interactive Voice Response (IVR), Computer Telephony Integration, an outbound Personal Connection Dialer (PCD), integration tools, and robust data reporting and analytics. With flexible connectivity options designed for AmeriCorps, NICE improves contact center cost-efficiency, reporting capabilities, and overall interaction quality and facilitates information transmission through enhanced secure communication.</p>

6- INVENTORY OF PII	
<b>6-1</b>	<p><b>Provide a list of all the PII included in the system.</b></p> <p>The call recording feature might capture voices of individuals.</p>

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM	
<b>7-1</b>	<p><b>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</b></p> <p>The NICE system handles manual calls and serves diverse user groups, such as the public, AmeriCorps volunteers and members, AmeriCorps federal employees and contractors, prospective employees of AmeriCorps, etc.</p>

8- INFORMATION IN THE SYSTEM	
<b>8-1</b> <b>A</b>	<p><b>For each category of individuals discussed above:</b></p> <p><b>Describe the information (not just PII) collected about that category and how the information is used.</b></p> <p>Voice, call recordings, and other user interaction data are kept on file by the call center for addressing customer service issues.</p>
<b>8-1</b> <b>B</b>	<p><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.</b></p> <p>Not Applicable</p>

8-1 C	<b>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.</b>
	Not Applicable
8-1 D	<b>Describe any application of PII redaction, mask, anonymization or elimination.</b>
	Not Applicable
8-1 E	<b>Describe any design that is used to enhance privacy protection.</b>
	Not Applicable

9- COLLECTIONS OF PII INTO THE SYSTEM	
9-1	<b>Describe for each source of PII in the system:</b> a. The source. b. What comes from that source. c. How the PII enters the system.
	NICE CXone stores call recordings. All calls to the AmeriCorps Hotline via NICE CXone are recorded and stored.  There is no PII entered manually into NICE CXone.
9-2	<b>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>.</b>
	The privacy controls integrated into the NICE CXone system for Voice calls serve to effectively ensure alignment with applicable privacy regulations and AmeriCorps policies. These controls include routine audits and monitoring mechanisms to detect and address potential privacy breaches or unauthorized access incidents, customization of voice greeting to notify the callers that their calls will be recorded for technical purpose, etc. Various security protection measures are implemented, such as encryption protocols to secure data transmission, access controls to restrict unauthorized access to the system, and data anonymization techniques. Moreover, strict adherence to data retention policies is enforced to avoid unnecessary storage of PII. Collectively, these measures aim to protect information within the NICE CXone system throughout its lifecycle.
9-3	<b>If PII about an individual comes from a source other than the individual, describe:</b> 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. <b>If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.</b>
	Not Applicable

<b>9-4</b>	<b>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>.</b>
	Not Applicable
<b>9-5</b>	<b>If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.</b>
	Not Applicable

### 10- SYSTEM ACCESS

<b>10-1</b>	<b>Separately describe each category of individuals who can access the system along with:</b> <ol style="list-style-type: none"> <li><b>What PII they can access (all or what subset).</b></li> <li><b>Why they need that level of access.</b></li> <li><b>How they would request and receive that access.</b></li> <li><b>How their access is reduced or eliminated when no longer necessary.</b></li> <li><b>Identify policies and procedure outlining roles and responsibilities and auditing processes.</b></li> </ol>
	<p>Authorized users of the NICE CXone system are staffs granted access based on their specific job roles and responsibilities to ensure proper functionality, compliance, and security. The staffs include: 1) call center agents who manage incoming and outgoing calls and the supervisors or managers responsible for overseeing call center operations, supporting agents, and reviewing call recordings for quality assurance; 2) administrators who configure and maintain the system, manage user accounts, and oversee system settings to ensure efficient operation; 3) the compliance officers who play a critical role in reviewing call recordings to ensure adherence to regulations, industry standards, and organizational policies, conducting audits, and verifying that agents comply with legal and ethical guideline; 4) technical support personnel may access the system temporarily to troubleshoot technical issues, perform maintenance, and resolve concerns related to call recording functionality. Additionally, security personnel are tasked with monitoring system activity, detecting unauthorized access attempts, and investigating security incidents, particularly those involving sensitive data such as call recordings. Access for each role is tailored to align with specific responsibilities, safeguarding the system's integrity and compliance with operational standards.</p>

### 11- PII SHARING

<b>11-1</b>	<b>Separately describe each entity that receives PII from the system and:</b> <ol style="list-style-type: none"> <li><b>What PII is shared.</b></li> <li><b>Why PII is shared (<i>specify the purpose</i>)</b></li> </ol>
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	<p>c. How the PII is shared (what means/medium).</p> <p>d. The privacy controls to protect the PII while in transit.</p> <p>e. The privacy controls to protect the PII once received.</p> <p>f. PII sharing agreements (<i>describe if the agreement specifies the scope of the information sharing, parties of agreement and the duration of the agreement</i>)</p> <p>g. Describe security and privacy clauses and audit clauses in the agreement or vendor (including third party vendors) contract.</p> <p><b>If PII is not shared outside the system, write <u>Not Applicable</u>.</b></p>
	Not Applicable. Voice recording is not shared outside of the NICE CXone.

## 12- PRIVACY ACT REQUIREMENTS

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

## 13- SAFEGUARDS

<b>13-1</b>	<p><b>Describe the data processing environments and the technical, physical, and administrative safeguards (including vendors') that protect the PII in the system.</b></p>
	<p>The implemented safeguards include: The NICE CXONE system administrator is required to sign the AmeriCorps Privileged User Rules of Behavior form and complete annual privacy and security training. Access to PII within NICE CXONE is restricted to authorized personnel with a legitimate need, enforced through robust authentication mechanisms, including usernames, passwords, and multi-factor authentication. Specific safeguards include call recording with sensitive data redaction, secure retention and disposal practices, and advanced system security measures such as firewalls, intrusion detection, and auditing to prevent unauthorized access All AmeriCorps staff involved in managing the NICE CXONE system and its supporting environment must undergo onboarding training and subsequent annual training on security, privacy, and records management. Personnels handling PII are required to complete role-based privacy and breach response training. The system is subject to continuous monitoring and configured to audit and log access to the system and PII, enabling timely evaluation and response to potential risks. AmeriCorps has identified applicable record retention schedules and designated personnel to oversee records retention and disposition. To maintain a strong information security and privacy compliance posture, AmeriCorps continuously documents, assesses, and monitors its implemented privacy and data security measures.</p>

<b>13-2</b>	<b>Describe the technical, physical, and administrative measures that protect PII if the system is being retired.</b>
	Not Applicable
<b>13-3</b>	<b>State if a system security plan and privacy plan is completed and the date of control verification.</b>
	NICE CXone Security Plan Revision 5 was completed Sept 24, 2024.

<b>14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL</b>	
<b>14-1</b>	<b>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete and the assurance procedure.</b>
	Not Applicable. Note: The NICE CXone voice recording was either directly from employees or contractors or from members of the general public.
<b>14-2</b>	<b>Describe how an individual could view, correct, update, or ask to amend their PII.</b>
	Not Applicable. The system does not process any PII contents. The caller can always call in again.
<b>14-3</b>	<b>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.</b>
	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.
<b>14-4</b>	<b>State if PII handling processes apply automation technology for decision making and describe the measures taken to eliminate risk to privacy interests.</b>
	No. Not Applicable

<b>15- DATA RETENTION AND DESTRUCTION</b>	
<b>15-1</b>	<b>Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.</b>
	The identified National Archives and Records Administration's (NARA) record retention schedule for NICE Xcone is GRS 6.5.010 for public service call records. The Disposition Authority is DAA-GRS-2017-0002-0001. The records are transient, and the disposition is due one year after the issue is rectified, or sooner if required; all records are deleted.
<b>15-1</b>	<b>Identify the role and process to coordinate with the parties involved the record retention and disposition.</b>

	System Owner/Information System Owner will coordinate the record retention activities with the Records Retention Officer and AmeriCorps NICE CXone Administrators.
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16- SOCIAL SECURITY NUMBERS (SSNs)	
<b>16-1</b>	<p><b>If the system collects truncated or full social security numbers (SSNs):</b></p> <ul style="list-style-type: none"> <li>a. Explain why the SSNs are required.</li> <li>b. Provide the legal authority for the usage of the SSNs.</li> <li>c. Describe any plans to reduce the number of SSNs.</li> </ul> <p><b>If the system does not collect any part of an SSN, write <u>Not Applicable</u>.</b></p>
	Not Applicable

17- WEBSITES	
<b>17-1</b>	<p><b>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>.</b></p>
	Not Applicable

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