

PRIVACY IMPACT ASSESSMENT

NATIONAL CONTACT CENTER (NCC)

June 2013

PART II. SYSTEM ASSESSMENT

A. Data in the System

Question	Explanation/Instructions
<p>1. Describe all information to be included in the system, including personal data.</p>	<p>a. The GSA National Contact Center (NCC) is an outsourced contact center that provides information to the general public about Federal agencies, programs and services via phone, e-mail, and web chat.</p> <p>The National Contact Center also supports a government publication order line through which it collects information from individuals who are placing orders for free printed materials. The following data is temporarily stored until the orders are processed: Name, street address, city, state, ZIP code, and phone number.</p> <p>The NCC also provides contact center support for other Federal Agencies. For most programs, the NCC only collects email addresses from citizens who have emailed an inquiry to that agency.</p> <p>The NCC provides after-hours contact center support for the Food and Drug Administration's Office of Crisis Management, which collects information from individuals who are calling about general drug information (interactions, recalls, side effects) and food/food safety issues. The following data is stored fewer than 7 days: Caller's Name, Caller's Phone Number, and reason for call, along with a recording of the call itself.</p>
<p>1.a. What stage of the life cycle is the system currently in?</p>	<p>Operation/Maintenance</p>
<p>2.a. What are the sources of the information in the system?</p>	<p>Information in the system is provided by the general public, who choose to call the National Contact Center or one of its agency partners.</p>
<p>2.b. What GSA files and databases are used?</p>	<p>NONE</p>
<p>2.c. What Federal agencies are providing data for use in the system?</p>	<p>NONE.</p>
<p>2.d. What State and local agencies are providing data for use in the system?</p>	<p>NONE</p>

2.e. What other third party sources will the data be collected from?	NONE
2.f. What information will be collected from the individual whose record is in the system?	E-mail inquiries: Ee-mail address for response Publication Phone Orders: Name, street address, city, state, ZIP code, and phone number FDA: Caller's Name, Caller's Phone Number, and reason for call, along with a recording of the call itself
3.a. How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?	No other data is collected.
3.b. How will data be checked for completeness?	It is the responsibility of the individual providing the data to make sure the data provided is complete and accurate.
3.c. Is the data current? How do you know?	It is the responsibility of the individual to provide current information. Due to the short life span of the data (not to exceed 120 days for most programs, 7 days for FDA), it is not necessary to maintain currency.
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	The data collected is maintained by the GSA National Contact Center's outsourced vendor. The vendor follows the business rules provided by the FCIC program office. The data elements, retention/archival, and disposal requirements are documented in a Word document, Data Retention.doc, maintained on the shared drive accessible to all FCIC employees, and on a Word doc titled "NCC FDA Data Security May 16 2013".

B. Access to the Data

Question	Explanation/Instructions
1. a. Who will have access to the data in the system?	<p>Outsourced contact center vendor employees: Customer service representatives (CSR) at the point of data entry System administrators System Owner, Project Manager, Program Manager, and Technical Manager</p>
1.b. Is any of the data subject to exclusion from disclosure under the Freedom of Information Act (FOIA)? If yes, explain the policy and rationale supporting this decision.	<p>Yes: Data is subject to exemption under the FOIA (5 U.S.C. Section (b) Exemption 4 and Exemption 6. Data is personal in nature and/or medical and provided by citizens for the purpose of ordering printed matter or obtaining information.</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p>System Administrators: The GSA National Contact Center is an outsourced contact center and is under the control of the Director, Contact Center Services Division. The vendor determines those agents who have systems administration authority. The user name and password are linked to the level of access authority in the system. Systems administration responsibilities are detailed in the individual's position description.</p> <p>Outsourced Contact Center Vendor's CSRs: Access to the system by vendor CSRs is controlled by the vendor and is dictated by duties and requirements of their positions. Access is limited to data entry.</p> <p>Outsourced Contact Center Managers and Supervisors – Managers and Supervisors view the data on a secure connection through the server. Managers and supervisors are responsible for protecting the information. Controls and procedures are documented in the System Security Plan.</p>
3. Will users have access to all data in the system or will the user's access be restricted? Explain.	<p>Individual Access: Individuals have no access to any personal data in the system. This process is part of the Standard Operating Procedures for the GSA National Contact Center.</p> <p>System Administrators: Only those individuals who have system data administration responsibilities as part of their official job duties and requirements have system-wide access. Access to these levels is restricted by the password and ID assigned.</p> <p>Outsourced Contact Center Vendor CSRs: Only those vendor CSRs whose duties and responsibilities require access to data have been given the authority for access. Those that do have access have gone through and passed a background investigation.</p> <p>Outsourced Contact Center Managers and Supervisors: Management personnel have access only to the technical and statistical data necessary for monitoring and measuring CSR</p>

	and system performance.
4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?	Outsourced contact center vendor, Managers, and Supervisors are operating under rules of behavior for the National Contact Center consistent with those in effect for GSA Federal employees in terms of protecting the privacy of others and not using information in the system for personal gain or to the benefit of others. The Rules of Behavior, training requirements, and system controls in place are documented in the NCC System Security Plan.
5.a. Do other systems share data or have access to data in this system? If yes, explain.	NO
5.b. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?	NA- no interface
6.a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	The FDA customer data is shared with FDA. The publication order customer data is shared with GPO, which is our outlet for distributing publications to citizens.
6.b. How will the data be used by the agency?	FDA will use the data to ensure that agents are properly serving the callers and/or to make follow-up calls to citizens. GPO will use the information to process publication orders taken through the NCC and distribute said publications.
6.c. Who is responsible for assuring proper use of the data?	The NCC assures proper use of the data prior to transmission to FDA and GPO.
6.d. How will the system ensure that agencies only get the information they are entitled to?	Information is segregated in the vendor's system by program. Only the information required to support the publication distribution process is transmitted to GPO. Only FDA caller information is transmitted to FDA.
7. What is the life expectancy of the data?	Retention of the data at the NCC is in compliance with GSA Handbook OAD P 1820.2A, GSA Records Maintenance and Disposition System. Additionally, a requirements document outlines the retention/archival and disposal of the data. Collected Data is maintained only as long as needed, not to exceed 120 days for free publication customer data and not to exceed 7 days for FDA customer information.
8. How will the data be disposed of	Data is disposed of using the guidelines as published in the

when it is no longer needed?	GSA Standards of Good Practice for Sanitization of Sensitive but Unclassified Data.
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C. Attributes of the Data

Question	Explanation/Instructions
1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	YES
2.a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	NO
2.b. Will the new data be placed in the individual's record (client or employee)?	NO
2.c. Can the system make determinations about individuals that would not be possible without the new data?	NO
2.d. How will the new data be verified for relevance and accuracy?	It is the responsibility of the individual providing the data to ensure its relevance and accuracy.
3.a. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.	The System Administrator is utilizing accounts that are password protected, control access to the consolidated data. Documented procedures are noted in the System Security Plan.
3.b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Yes – controls are documented in the System Security Plan.
4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Data may be retrieved by NCC users with password protected accounts authorized by the System Administrators within the retention period. This would only be done if there was a problem with the order or a problem with the FDA file transmission process.
5. What are the potential effects on the privacy rights of individuals of: a. Consolidation and linkage of files and systems;	There are no known adverse effects on the privacy rights of individuals who avail themselves of GSA NCC services. a. The NCC is not linked to other files or systems

<p>b. Derivation of data;</p> <p>c. Accelerated information processing and decision making; and</p> <p>d. Use of new technologies.</p> <p>How are the effects to be mitigated?</p>	<p>b. None</p> <p>c. None</p> <p>d. No new technologies have been implemented.</p> <p>N/A</p>
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D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1.a. Explain how the system and its use will ensure equitable treatment of individuals.	The system is used solely to process publication orders or to provide information for FDA inquiries. There is no disparate treatment of individuals.
1.b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	The NCC includes two call centers (Lakeland, FL and Lock Haven, PA), where data is collected; a data center in Langhorne, PA, where data is stored; and headquarters in Newtown, PA, where telecommunications are controlled. All are operated by a single contractor. All NCC elements establishing a real-time connection with NCC internal computers through the Internet must employ a virtual private network (VPN) product, SSL VPN Juniper Secure Networks, approved by the Information Security Department, which can encrypt all traffic exchanged. Data necessary to process orders for publications are encrypted and transmitted over the Internet to the GPO publication distribution facility in Pueblo, Colorado via FTP. At the data center, access is subject to access controls and access authority, and data storage is not to exceed 120 days (7 days for FDA information).
1.c. Explain any possibility of disparate treatment of individuals or groups.	There is no disparate treatment of individuals.
2.a. What are the retention periods of data in this system?	Retention of the data at the NCC is in compliance with GSA Handbook OAD P 1820.2A, GSA Records Maintenance and Disposition System. Additionally, a requirements document outlines the retention/archival and disposal of the data. Collected Data is maintained only as long as needed, not to exceed 7 days for FDA information and 120 days for all other information.
2.b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Data is disposed of using the guidelines as published in the GSA Standards of Good Practice for Sanitization of Sensitive but Unclassified Data.
2.c. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Data is not maintained long enough to require it be reviewed for accuracy, relevance, and timeliness.
3.a. Is the system using technologies	NO

in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	
3.b. How does the use of this technology affect individuals' privacy?	N/A
4.a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	NO
4.b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	NO
4.c. What controls will be used to prevent unauthorized monitoring?	Both GSA and the NCC vendor monitor the actions of individual employees for purposes of quality control and assurance. Password protection insures that people who do not review for purposes of quality control and assurance do not have access to any of the PII .
5.a. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	Information is collected to fulfill printed material orders, answer inquiries, and general drug information requests. Information is not retrieved by name or any other unique identifier. Thus, this system does not meet the definition of a system of records.
5.b. If the system is being modified, will the SOR require amendment or revision? Explain.	N/A