



Privacy Impact Assessment for the
**Combined Federal Campaign (CFC) Online
Application and Donation System**

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Abstract

The Office of Personnel Management (OPM) Combined Federal Campaign (CFC) Online Application and Donation System are maintained by the CFC Central Campaign Administrator (CCA) and managed by the Merit System Accountability and Compliance (MSAC)/Office of CFC. The mission of the CFC program is to promote and support philanthropy through a program that is employee focused, cost-efficient, and effective in providing all federal employees the opportunity to improve the quality of life for all. The CFC Online Application and Donation System centralize all aspects of CFC administration to a single point of entry for charities, donors, and payee systems. This Privacy Impact Assessment is being conducted because the CFC collects, maintains, and uses personally identifiable information about the individuals who participate in charitable giving through the CFC.

Overview

The CFC is the largest workplace giving campaign in the world. Since its inception in 1961, Federal employees have pledged more than \$8 billion to thousands of qualified local, national, and international charities. Through 2016, the CFC was administered through over 120 local campaigns across the country and overseas. Charities applied to participate, either as an independent charity or a member of a federation, by submitting an application to either OPM or to one of the local CFC campaigns. Similarly, Federal, Postal, and military personnel donated through the CFC by submitting a completed paper or electronic pledge form to their payroll office and/or the administrator in their local campaign. The local administrators, known as Principal Combined Fund Organizations (PCFO), collected and maintained information about the donors, their contribution, and their designated charitable organizations to process and account for donor contributions. The PCFO collected cash, checks, and credit card contributions directly from the donors and from the donors' payroll offices when donors had chosen to make contributions via payroll deduction. The PCFO then



made payments directly to the individual charities or federations chosen by the donors.

Based on recommendations from a Federal Advisory Committee known as the CFC 50 Commission established in 2011 to study the CFC and determine how to streamline and improve the program, OPM is now centralizing two core components of the CFC: a) the applications submitted by charities and federations that want to participate in the CFC; and b) the contributions from individuals who wish to support those charities. Accordingly, the CFC Online Application and Donation System (cfccharities.opm.gov for charities applying to the CFC and cfcgiving.opm.gov for individual donors) will replace the redundant paper processes and electronic systems that were operated by the PCFOs.

This new online system is expected to reduce administrative costs, increase transparency and ensure that more of the contributions made by Federal, Postal and military personnel reach the people who need help the most. This new system replaces electronic CFC modules in Employee Express and myPay, as well as a variety of local systems. The government benefits of the new system include:

- Universally available electronic giving. Prior systems only provided truly paperless giving to employees served by certain payroll providers.
- Increased transparency and accountability with fees disclosed up front to the donor before they pledge. The cost of administering the campaign is shared by charities and not just by donors.
- A new avenue for recurring gifts by annuitants who could only make one-time pledges in the past;
- The ability to engage employees to give their money and their time; and
- An additional new feature that will enable newly hired employees who start working for the Federal service outside CFC "Open Season" to establish a pledge to their approved local, national or international charities.



Individuals will submit their donation information either electronically or by filling out a paper pledge form, which the CCA will then scan into the electronic system. In addition to centralizing the CFC functions, OPM is also expanding the donor pool by allowing civilian annuitants and military retirees to participate and by permitting Federal employees to pledge volunteer hours in addition to financial gifts.

The CFC Online Application and Donation System collects and maintains the application information for charities applying to participate in the CFC and collects the charities' CFC application and listing fees. Once a charity has been accepted into the campaign, the system is updated to allow donors to pledge charitable contributions to the approved charity. Donors will have the ability to set up payroll deductions or provide one-time gifts using credit cards, electronic fund transfers, or checks. All donors who voluntarily provide needed information will be registered and allowed to use the system to donate funds and/or volunteer time (to those charities accepting volunteer hours). Employees using the new CFC system will recognize the CFC donation process as similar to the deduction process for their other federal benefits.

The system submits requests for payroll deductions from an employee's payroll provider. Payroll providers will then deduct those funds and transmit them electronically to the CCA. The CCA will electronically disburse funds monthly or quarterly to charitable organizations' in accordance with donors' wishes. Information on the donors and the disbursements will be available to the charity System over secure web application.

Section 1.0 Authorities and Other Requirements

1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

Executive Order (EO) 12353 (March 23, 1982), EO 12404 (February 10, 1983), and EO 13743 (October 13, 2016); 5 CFR Part 950; Pub. L. 100-202 and Pub. L. 102-393 (5 U.S.C. §1101 Note) require the creation of a centralized workplace giving campaign for the Federal government that is



employee focused, cost-efficient, and effective in providing all federal employees the opportunity to improve the quality of life for all.

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The information will be covered by the OPM/Central 20 National CFC System SORN, currently under development and review.

1.3. Has a system security plan been completed for the information system(s) supporting the project?

A system security plan was completed as part of the Authority to Operate, which was granted on November 26, 2016. A security assessment of the environment was conducted the summer of 2017 and was included as part of the system recertification submission package.

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Pursuant to 5 CFR § 950.604, CFC records must be retained for at least three completed campaign periods. OPM is currently developing a records schedule to submit to NARA for approval.

1.5. If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The information in the CFC Online Application and Donation System is obtained via the following forms, listed with their corresponding OMB Control numbers:

Form Number	Form Name	OMB Control Number
OPM Form 1647-A	Application for Independent Organizations and Members of Federations	3206-0131
OPM Form 1647-B	Application for Federations	3206-0131
OPM Form 1647-E	Application for Family Support and Youth Activities Organizations	3206-0131
OPM Form 1654-A	Standard Employee Pledge Form	Not applicable



Form Number	Form Name	OMB Control Number
OPM Form 1654-B	Standard Retiree Pledge Form	Pending

Section 2.0 Characterization of the Information

2.1. Identify the information the project collects, uses, disseminates, or maintains.

The CFC Online Application and Donation System collects the following information from individual donors:

- a. Name;
- b. Social Security Number or other employee identification number used by a Federal payroll or retirement system;
- c. Work address;
- d. Home address;
- e. Phone number;
- f. Government e-mail address;
- g. Secondary e-mail address;
- h. Employment information (to include, but not limited to, Federal agency or military branch, department/unit, office, military service, commands, etc.);
- i. Charity or charities designated;
- j. Amount of donation, in dollars or hours;
- k. Credit card information, including credit card number and expiration date;
- l. Bank account number and bank routing number;
- m. Authorization to release name and other information to charities;
- n. Usernames and passwords created to access the system;



- o. Security questions and answers (for resetting passwords to access the online system);
- p. Help Desk ticket information; and
- q. Customer (donor and charity) satisfaction surveys.

The CFC Online Application and Donation System also obtains information from the charities that apply to participate in the CFC program where it is necessary for the charity to demonstrate that it is qualified to participate under 5 CFR Part 950. This includes contact information (email, names of points of contact, business address), usernames and passwords created to access the system, tax identity number, CFC code, bank account information, public audit files (audited financials, Internal Revenue Service (IRS) Form 990, IRS letters of determination, IRS Doing Business As letter, base commander authorization letters, and other information as defined in the federal regulations for the application).

2.2. What are the sources of the information and how is the information collected for the project?

Individual donors provide their information by completing electronic forms on the public-facing CFC website Donation. For the first five years that the system operates, donors may also submit paper forms, which the CCA then scans into the CFC Donation System for document retention. The information on the form is then manually entered into the system. If any information on the paper form is illegible, the form includes a primary and secondary e-mail address which the customer service team will use to get better instructions from the contributor.

Charities provide their information by completing a web-based form and uploading relevant documentation into the CFC Online Application and Donation System. Existing information systems will transfer historical charity data one time to the charity system which will contain PII such as contact information.



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

The CFC Donation System does not use publicly available information or information from commercially available sources about individuals who make donations through the CFC. However, the CFC Online Application and Donation System does obtain information from the Internal Revenue Service's Exempt Organizations Business Master File (IRS EO BMF) in order to ensure that charities are eligible to participate in the CFC.

2.4. Discuss how accuracy of the data is ensured.

Individual donors provide their information by creating an account and typing their information directly into the public-facing CFC donor website. They can log into their accounts at any time to correct any errors in their information, though donation amounts can be changed only during an enrollment period. Therefore, the system relies upon the user's knowledge of their data to make sure it is valid. The system does not actively check the accuracy of the data.

The system has built-in features that contribute to the individual donors providing accurate information. For example, fields requesting donation amounts accept only numeric characters and the field requesting social security number is limited to nine numeric characters. Entering too many or too few numbers in the social security field will invalidate the entry and the record will not be allowed to save.

Information that donors submit via paper forms contain a primary and secondary e-mail address which the CCA's customer service team will use when information is illegible to contact the donor and obtain accurate information. Information provided by the charities who apply to participate in the CFC is reviewed by appropriate federal employees working on the CFC and reconciled against information from the IRS prior to authorization.



2.5. Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk	Mitigation
There is a risk that the system will collect more information than is necessary to process individual donations.	This risk is mitigated by requesting only the information that is needed to process the individual donors' charitable contributions and by accepting only the designated donor form for those individuals who do not make use of the electronic system.
There is a risk that Social Security numbers will be collected in situations where they are not needed.	This risk is present only for those individuals who make use of the paper pledge form and who are donating through a means other than payroll or annuity deduction. If those individuals provide SSN on the paper form, the risk of over collection of SSNs is partially mitigated because the SSN will not be manually entered into the system. However, the complete form, including SSN, will be scanned for document retention and the SSN will be retained for as long as the scanned form is retained.
There is a risk that the information collected is not accurate, and that individual charitable donations will not be properly processed.	This risk is mitigated by collecting information directly from the individual donors, who have an interest in ensuring that the information they provide about themselves is accurate, and by structuring the electronic data fields to reduce the possibility that inaccurate information will be provided. Data from paper pledge forms is manually entered into the system at the CFC Processing Center in Madison, WI. If any information on the paper form is illegible, the form includes a primary and secondary e-mail address which the customer service team will use to get better instructions from the contributor. Should any PII be illegible, the customer service team will request that the donor submit a corrected pledge form or written instructions to make corrections. In instances where paper pledge forms are submitted in a batch by a campaign manager, the customer service team may reach out to the official who submitted the batch if information such as the employees' department, agency, or office is not legible.

Section 3.0 Uses of the Information

3.1. Describe how and why the project uses the information.

The information provided by the individual donors is used by OPM and the CCA to receive, process, and account for their charitable donations; make payments to charitable organizations; and address inquiries from donors and other stakeholders, including Federal agencies, charitable organizations, and Congress, as necessary. In particular, Social Security numbers are provided to and used by payroll providers to accurately re-direct payment from the



appropriate individual donor to the authorized charity; credit card and banking information is used to process one time pledges made using credit card or ACH.

Information obtained from individual donors may also be used to produce summary, de-identified descriptive statistics and analytical studies pertaining to the CFC program. Information obtained from the charitable organizations is used to approve or deny their applications to participate in the CFC and to adjudicate appeals by charities that are denied.

The CCA will also provide the names, home addresses, and personal email addresses of donors to the designated charitable organizations or their federations, where applicable, when the donor has so requested. The CCA and the federation may not make any other use of donors' names and contact information.

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

The system does not currently conduct data searches or analysis to locate predictive patterns or anomalies.

3.3. Are there other programs/offices with assigned roles and responsibilities within the system?

Pursuant to the Inspector General Act, the system allows for an "auditor" role for OPM's Office of the Inspector General to review transactions. Otherwise, only authorized users within the CFC Program Office or designated CCA personnel have access to the system.



3.4. Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk	Mitigation
There is a risk that the information will be used for a purpose other than that for which it was collected.	This risk is minimized by allowing only authorized users from the program office, CCA, or OIG auditor to access data. User activity on the system is monitored and security alerts are generated if suspicious activity is noted. The system incorporates an Identity and Access Management service that automatically restricts access to data based on a user's profile. For example, donors can view and edit their own records and can also view a listing of approved charities; charities can view and edit their own records and can also view the donations they have been pledged. Charities cannot view any information on the donor, unless the donor allows the release of contact information and donation amount.
There is a risk that either an authorized or an unauthorized user may access the information for an unauthorized purpose.	This risk is reduced by auditing the use of reports from the system. User activity on the system is monitored and security alerts are generated if suspicious activity is noted. In addition, clearly defined roles and access contribute to mitigating this risk. For example, system administrators do not have access to charities' or donors' data but Customer Service Representatives can view and edit both charities' and donors' information. Project audit logging captures all changes made to a record, including the identity of the individual making changes.

Section 4.0 Notice

4.1. How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Individual donors are provided with a Privacy Act Statement on the CFC website or on the paper donor form when they provide their information. Notice will also be provided via the pending OPM/Central 20 National CFC System SORN and this PIA.

4.2. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Participation in the CFC is voluntary. Those who participate do not have the ability to consent to the use of their information for purposes related to



processing their charitable donation but that can opt out if having their name and contact information released to the charity to which they are donating.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk	Mitigation
There is a risk that individual donors will not have adequate notice concerning how the information they provide will be used by the CFC program and disclosed to third parties.	This risk is mitigated by providing individual donors with a Privacy Act Statement when they provide their information and by permitting them to opt in to any disclosure of their information to the charity to which they donate.

Section 5.0 Data Retention by the project

5.1. Explain how long and for what reason the information is retained.

Pursuant to 5 CFR § 950.604, CFC records must be retained for at least three completed campaign periods. A campaign period spans approximately 33 months, beginning with the CFC charity application process and ending with the completion of the audit of the campaign following the final disbursement of campaign funds. OPM is currently developing a records schedule to submit to NARA for approval. Until that records schedule is final, all CFC records must be retained permanently.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk	Mitigation
There is a risk that the information will be retained for longer than the three completed campaign periods deemed necessary in the applicable regulation.	Without a records schedule in place, this risk is currently not mitigated. The CFC program is working to mitigate by developing a records schedule to submit to NARA for approval. Until there is an official records schedule, NARA regulations require OPM to consider the record's status as permanent.



Section 6.0 Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Individual donors' information is provided to credit card companies, banks, and other financial institutions in order to process one-time or recurring donations. For those individual donors who choose to contribute to the CFC via payroll deduction, information is provided to their payroll office in order to facilitate accurate payroll deductions. For retirees/annuitants who choose to contribute to the CFC via annuity deduction, information is provided to their retirement service office in order to facilitate accurate annuity deductions. With the consent of the individual donors, the CFC will also share name, address, and donation amount with the applicable charity participant. This information allows the charities to send the donor letters of appreciation. User and sharing activity on the system is monitored (and security alerts are generated) if suspicious activity is logged.

6.2. Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The external sharing of information described in section 6.1 is consistent with the purposes stated in the OPM/Central 20 National CFC System SORN. In particular, the SORN's routine uses "h" and "i" specifically permit the disclosure of the information to credit card companies, banks, and other financial institutions as well as to payroll offices and retirement services, as appropriate.

6.3. Does the project place limitations on re-dissemination?

Yes. Through CFC regulations, OPM prohibits any lists of donors or non-donors from being disseminated. In addition, by regulation, OPM restricts how charities can use any data authorized by the donor for release. Charities may not sell lists of donors who authorize the release of their name, address or gift amount.

6.4. Describe how the project maintains a record of any disclosures outside of OPM.

Transaction records that support donor and charities activities (e.g., registrations, donations) are retained and can be accessed as appropriate to



document disclosures. In addition, these transaction records are retained in accordance with standards identified in section 5.1.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk	Mitigation
There is a risk that information will be shared with an external entity or re-disseminated by an external entity for a purpose other than the purpose for which the information was collected.	This risk is significantly reduced by monitoring data use. User activity on the system is monitored and security alerts are generated if suspicious activity is noted. The applicable regulation also limits the charity's ability to disseminate information it receives through CFC.

Section 7.0 Redress

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

Individual donors are instructed to create login credentials when they arrive at the CFC website to make a donation. Individuals may then access their own records by logging into cfcgiving.opm.gov (aka opm.gov/showsomelovecfc) with their e-mail address, password, and a multi-factor authentication token (i.e., a one-time password or code sent to the user's email account or phone). Alternatively, individuals seeking notification of and access to their records in this system of records may submit a request in writing to the Office of Personnel Management, Office of the Combined Federal Campaign, 1900 E Street, NW, Washington, DC 20415. Individuals must furnish the following information for their records to be located:

1. Full name.
2. Date of birth.
3. Social Security Number.
4. Signature.
5. Available information regarding the type of information requested.
6. The reason why the individual believes this system contains information about him/her.
7. The address to which the information should be sent.



Individuals requesting access must also comply with OPM's Privacy Act regulations, 5 CFR Part 297, regarding verification of identity and access to records.

Individuals may also contact the CCA Customer Care Center via telephone (Mon.-Fri. 8am-6pm CST) at (800)797-0098, or (608) 237-4898.

7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individuals may modify or correct their own records by logging into cfcgiving.opm.gov with their e-mail address, password, and a multi-factor authentication token (i.e., a one-time password or code sent to the user's email account or phone). Alternatively, individuals may request that records about them be amended by writing to the Office of Personnel Management, Office of the Combined Federal Campaign, 1900 E Street, NW, Washington, DC 20415 and furnishing the following information for their records to be located:

1. Full name.
2. Date of birth.
3. Social Security Number.
4. Local CFC name or city, state and zip code of their duty station
5. Signature.
6. Precise identification of the information to be amended.

Individuals requesting amendment must also follow OPM's Privacy Act regulations regarding verification of identity and amendment to records (5 CFR 297).

7.3. How does the project notify individuals about the procedures for correcting their information?

Individuals are notified about the procedures for correcting their information through the User Manual at cfcgiving.opm.gov, the pending OPM/Central 20 National CFC System SORN, and this PIA. In addition, individual donors may contact the CFC Customer Care Center at (608)237-4898 (local/international) or (800)797-0098 (toll free) for assistance.



7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk	Mitigation
There is a risk that individuals will not understand how to access and amend their information in the System.	This risk is mitigated by providing information to the individuals at the CFC website, in the applicable SORN, and through this PIA.

Section 8.0 Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in this PIA?

The CFC Online Application and Donation System generates audit logs that are reviewed periodically to determine whether information is being handled appropriately. The relevant CCA contract also covers privacy requirements that aid in ensuring information is used appropriately.

8.2. Describe what privacy training is provided to users either generally or specifically relevant to the project.

All OPM employees are required to take annual security and privacy awareness training. In addition, the MSAC/OCFC trains assigned employees on the Standard Operating Procedures that describe how PII is handled. All CCA personnel take security and privacy awareness training provided by their employer.

8.3. What procedures are in place to determine which users may access the information and how does the project determine who has access?

Donor account creation is based upon an e-mail/username and password combination. The donor will receive a system-generated message to verify the account. A donor can log in to the system at any time during open season to enter or update a pledge to the local, national and international charities approved to participate in the campaign. Accounts can be created by Federal employees, members of the military, retirees, or contractors. Once an account is created, the donor can search the list of approved charities and make or edit a pledge at any time during open season and submit it for processing. Approved CFC charities obtain donor data by logging into the CFC Online Application and Donation System. The system



limits the charity access only to information on its own organization. In addition, the system records the log-on activity of the charity.

Payroll providers only have access to their own data and the data exchange process with them has been heavily limited and secured. The system incorporates an Identity and Access Management service that automatically restricts access to data based on a user's profile.

Program office leadership determines who gets system administrator rights and the program has identified unique types of users and their access by role. For example, donors can view and edit their own records and can also view a listing of approved charities; charities can view and edit their own records and can also view the donations made to them. However, charities cannot view any information on donors unless the donors specifically consent to the release of their name, address, and donation amount. In addition, system administrators do not have access to charities' or donors' data, but Customer Service Representatives can view and edit both charities' and donors' information. Project audit logging captures all changes made to a record, including the identity of the individual making changes.

8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

The Chief Information Security Office will administer and maintain information sharing agreements (ISA) with Federal government entities in regard to access and data transfers. The ISAs are renewed annually. Additionally, there is an OPM vendor that is tasked with administering the campaign and its subcontractors. Each subcontractor has agreements in place with all financial institutions that process payments. The agreements are updated when contracts are created or maintained.



Responsible Officials

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Approval Signature

Signed copy on file with the OPM Chief Privacy Officer

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