



Privacy Impact Assessment for
CXone Retirement Services (RS) Contact
Center as a Service (CCaaS)

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Contact Point

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Abstract

The United States Office of Personnel Management's (OPM) Retirement Services' (RS) Retirement Information Office (RIO) Contact Center, in conjunction with the Office of the Chief Information Officer (OCIO), has implemented a new system to support the Contact Center. The new system will handle a higher volume of inbound telephone calls and emails, upgrade quality monitoring, and improve reporting metrics and workforce management. This PIA is being conducted because the new system contains personally identifiable information (PII) about federal annuitants, their dependents, and survivors.

Overview

The United States Office of Personnel Management's (OPM) Retirement Services' (RS) Retirement Information Office (RIO) Contact Center, in conjunction with the Office of the Chief Information Officer (OCIO), implemented new system to support the Contact Center. It uses a cloud-based, multi-channel Commercial Off the Shelf (COTS) software based on "Contact Center as a Service" (CCaaS) technology. It replaces an older on-premises system that has since been decommissioned.

The new CCaaS system uses NICE InContact's CXone (CXone) cloud-based approach. It handles a higher volume of inbound telephone calls and emails, has better quality monitoring features, and should improve reporting metrics and workforce management. This means Federal retirees calling the RIO are less likely to receive a busy signal, should have shorter wait times, and will have an improved Contact Center experience.

The Contact Center is one of the primary ways that federal retirees, survivors, and their families receive consumer service for their Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS).

There are currently 2.7 million annuitants on the RS annuity roll and that number will continue to grow as the aging federal workforce retires.

The Contact Center is the front-line staff for RS and provides retirement-related services to customers via telephone and email. The Contact Center receives a wide range of retirement-related services, including requests for change of address, change of banking information, change of tax withholding, Services Online password resets, and verification of annuity payments. It handles questions regarding federal retirement, health benefits, life insurance and other insurance benefits. It also serves as the RS primary point of contact for individuals to report the death of an annuitant and request the processing of survivor benefits, if eligible.

CXone collects information about current and future retirees including their name, contact information, address, and other details an individual may relay in their call to the Contact Center. RS collects this information to provide customer services attendant to the retirement accounts of their customers.

CXone is not the authoritative source for retiree information. When a Contact Center agent interacts with a caller, they collect the caller's phone number but will not use CXone to record detailed call information or the resolution. Any changes are made in the system that manages the retiree's account. The audio of the call and what appeared on the Contact Center agent's computer is collected only so management can review an agent's work and let them know if there are better ways to resolve a call. Likewise, emails sent by the Contact Center agent may be reviewed for quality, but that information will not be stored as part of the retiree's file.

The following is an overview of the RS activities that are covered by CXone:

- **Telephony:** The telephony platform was modernized with a transition to a Cloud Based Voice Over IP (VoIP) solution. As RS customers call RIO, incoming calls are received over the VoIP solution and routed to the appropriate team based on the caller's requested area of service.
- **Email:** The customer submits an inquiry using the template found in the Customer Support Center on the Retirement Services (RS) portion

of the OPM website. The inquiry goes into the CXone email queue for the appropriate team to provide a response.

- **Call Monitoring Solution:** RS managers have dashboards, reports, and recordings to monitor the quality and performance of the team, effectively monitor agent performance, maximize customer satisfaction, and end user experience.
- **Workforce Management Solution:** RS managers can forecast volume and scheduling to boost team efficiency across customer response channels to improve overall operational efficiency and better manage day-to day Contact Center (formerly call center) performance.

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?

CSRS is administered pursuant to 5 USC Chapter 83 and FERS is administered pursuant to 5 USC Chapter 84. In addition, the following authorities are relevant to the information in the system: 5 USC 3301 and Chapters 87, 89 and 90; Pub. L. 83-598, 84-356, 86-724, 94-455, and 106-265; and Executive Order 9397, as amended by Executive Order 13478.

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

Retirement records are covered by the OPM/CENTRAL-1, Civil Service Retirements and Benefits SORN. Certain records contained in this system may not be retrieved by personal identifier and are therefore not subject to the Privacy Act.

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

CXone is a FedRAMP-approved system. OPM Security has provided a System Security control protocol for the system.

1.4. Does a records retention schedule approved by the National

Archives and Records Administration (NARA) exist?

Yes. Emails are maintained pursuant GRS 6.1 and Contact Center calls, including Contact Center recordings, are maintained pursuant to GRS 6.5, Item 010 (public customer service operations records). The actual retirement case files are maintained pursuant to DAA-0478-2017-0001.

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.

Per OMB memorandum from April 7, 2010, the PRA only applies to collections of information using "identical questions." The memo further clarifies that many different types of information collections, such as receipts, acknowledgements, affidavits, change of addresses, etc. would not be subject to the PRA "provided that they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument."

The Contact Center, and CXone by default, only require standardized questions to verify the respondent's identity. After these necessary data points are collected and verified, the process then shifts to an unstructured conversation, which would put this information outside of the PRA.

Section 2.0. Characterization of the Information

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

When someone calls the Contact Center or an agent calls out from the center, CXone will collect the name of the Contact Center agent, the caller or recipient's phone number, the length and purpose of the call, the audio of the call, and what appeared on the Contact Center agent's computer screen.

There are several forms to email the Contact Center built into the guidance provided at <https://www.opm.gov/support/retirement>. The forms request the individual's claim number, name, email address, date of birth, mailing address, topic of the issue, a brief discussion of the issue itself. When the

Contact Center agent responds, their response will also be collected into CXone.

CXone also collects details about the Contact Center agents including their contact information, respective skill area, and availability to answer calls.

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

Some information in CXone is obtained directly from the individual annuitant, survivor, or other contact who call or are called by the Contact Center. Some information is provided by the Contact Center agent. For example, agents may use information from the retiree's account in the Annuity Roll System (ARS) or the Annuitant Health Benefits Open Season System (AHBOSS) to respond to a caller's questions, as well as to communicate with the retiree's insurance carrier or another third party on behalf of the retiree. There is no integration between the CXone and ARS or AHBOSS, but that information may appear in the audio or screen recording of a call or the text of an email.

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

No, CXone does not use commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

RS knows bad actors attempt to steal retirees' benefits by asking the Contact Center to change where the benefits are sent or similar. For this reason, Contact Center agents only provide limited information in response to an email. Retirees asking for more sensitive information or to change anything about their account must call the Contact Center so a Contact Center agent can more thoroughly verify their identity before responding. As part of the verification process, Contact Center agents compare information provided by the emailer or caller to information OPM already has about that retiree in the ARS system.

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

Privacy Risk: There is a risk of collecting extraneous information if customers submit information or attachments in emails to the Contact Center.

Mitigation: This risk will be mitigated by Contact Center agents advising users that email correspondence should be limited to the information needed to respond to their support request.

Privacy Risk: There is a risk that the information in customer contact information is not accurate in CXone.

Mitigation: This risk is mitigated by the detailed procedures the RIO Contact Center has in place to capture and ensure that the customer information is as accurate as possible during the support call or email exchange. Contact Center agents use information in the ARS system to confirm the identity of the caller or the email sending.

Section 3.0. Uses of the Information

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

CXone captures an audio and screen recording when Contact Center agents receive or make calls on behalf of a retiree. Likewise, CXone captures the text of the emails between the Contact Center agents and retirees, or other parties contacted on behalf of a retiree. Managers and the quality assurance teams review those calls and emails to identify how an agent could enhance their customer service and may share those findings with the agent as part of a training.

CXone captures how many times a particular phone number or email was used to contact the Contact Center to try and identify situations where a person may not be receiving the service they need such that additional steps should be taken to help them.

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.

No. CXone does not use technology to conduct electronic searches, queries, or analyses of the PII for the purpose of discovering or locating a predictive pattern or anomaly. Only data associated with the caller, the caller's request, and data about the purpose and length of call are captured and analyzed.

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

Yes, in addition to RS, the Office of the Chief Information Officer (OCIO) has assigned roles and responsibilities within the system. OCIO will require access for IT support such as installing software on agent desktops to access the system and to support administration of the system.

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

Privacy Risk: There is a risk that the information in CXone could be used for a purpose other than that for which it was initially collected.

Mitigation: This risk is mitigated by the user roles established by the CXone Administrator. Only those with a function related to managing the system are granted access and only authorized users may access or modify the data in CXone.

Privacy Risk: There is a risk that an unauthorized user might access the information in the system or that an authorized user might access the data in the system that he or she does not have a business need to review.

Mitigation: This risk is mitigated through role-based access control and following a strict IT access provisioning policy. Specific roles for Administrators, Managers, and Agents have been defined to prevent unauthorized user access to information.

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.

When individuals contact the Contact Center via an online form, the website containing the form provides an explanation of how their

information will be used. When individuals contact the Contact Center, the Contact Center agent explains to the caller that information will be collected during the call to respond to customer's request for information.

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

Customers calling into the Contact Center are initially advised that their call is being recorded. At that time, customers may opt to exclude themselves by dropping off the call though assistance may be limited if they choose to do so. If customers communicate via email, they may opt to exclude information from their emails that they do not wish to provide.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is no risk related to notice as callers are advised that calls are recorded and that their information necessary to positively identify the annuitant and address their request will be captured. The SORN listed in 1.2 provides notice that their information can be shared with other offices or agencies to meet their needs or resolve their complaint.

Mitigation: Not applicable.

Section 5.0. Data Retention by the Project

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

Emails are maintained for seven years pursuant to GRS 6.1; and Contact Center calls, to include screen and voice recordings, are maintained for one year after the issue is resolved (GRS 6.5, Item 010). Recordings are then moved to archival storage for a period of one year. If an email or details of a Contact Center call need to be maintained longer, those items are converted to a record format (.pdf or word) and maintained in the appropriate file, subject to the retention schedule appropriate to that file. The actual retirement case files are maintained pursuant to DAA-0478-2017-0001.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information will be kept longer than is necessary to achieve the necessary business purpose.

Mitigation: This risk is mitigated by adhering to the applicable records schedule, which addresses the business need to retain the information. The program office should review the five-year archival of recordings with the Records Officer to determine whether there is a business need to retain those records beyond the one-year base retention called for in the applicable records schedule.

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.

Per routine uses in the relevant SORN, some of the information in CXone may be shared externally with FEHB insurance carriers and other Federal agencies as Contact Center agents work to gather and provide information to customers. Only the information necessary to address the inquiry is generally shared.

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

The information sharing described above is conducted in accordance primarily with the following routine uses in the OPM/CENTRAL-1 SORN.

For Non-Federal Personnel--To disclose information to private organizations, contractors, grantees, volunteers, or other non-Federal personnel performing or working on a project, contract, service, grant, cooperative agreement, or job for, to the benefit of, or consistent with the interests of the Federal Government when OPM has determined that the use of that information is compatible with proper disclosure and will benefit Federal employees, annuitants or their dependents, survivors, and beneficiaries. To disclose information to contractors, grantees, or volunteers performing or working on a contract, service, grant, cooperative agreement, or job for the Federal Government.

k.To disclose, to the following recipients, information needed to adjudicate a claim for benefits under OPM's or the recipient's benefits program(s), or information needed to conduct an analytical study of benefits being paid under such programs: Office of Workers' Compensation Programs; Department of Veterans Affairs Pension Benefit Program; Social Security Administration's Old Age, Survivor and Disability Insurance and Medical Programs and Supplemental Security Income Program; Center for Medicare and Medicaid Services; Department of Defense; Railroad Retirement Board; military retired pay programs; Federal civilian employee retirement programs (other than the CSRS or FERS); or other national, State, county, municipal, or other publicly recognized charitable or social security administrative agencies.

l. To disclose to the Office of Federal Employees Group Life Insurance (OFEGLI) information necessary to verify the election, declination, or waiver of regular and/or optional life insurance coverage or eligibility for payment of a claim for life insurance.

m.To disclose to health insurance carriers contracting with OPM to provide a health benefits plan under the FEHB, SSN, and other information necessary to identify enrollment in a plan, to verify eligibility for payment of a claim for health benefits, or to carry out the coordination for benefits provisions of such contracts.

z. To disclose to an allottee, as defined in 5 CFR 831.1501, the name, address, and the amount withheld from an annuitant's benefits, pursuant to 5 CFR 831.1501 et seq. as an allotment to that allottee to implement the program of voluntary allotments authorized by 5 U.S.C. 8345(h) or 8465

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

No. When information is shared with insurance carriers to address an individual's inquiry, the information is shared from ARS and not CXone.

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

When information is shared with insurance carriers to address an

individual's inquiry, the information is shared from ARS and not CXone.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information from CXone could be inappropriately disclosed for a purpose that is not consistent with the purpose for which it was collected.

Mitigation: This risk is mitigated by Contact Center procedures guiding agents to verify an individual's identity so that only callers who are entitled to receive information about an annuitant will receive that information. In addition, agents receive instruction about what external entities it is appropriate to contact and provide information to about an individual caller to resolve the caller's inquiry.

Section 7.0. Redress

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

Customers do not have direct access to CXone as those records are stored on the CXone system and they will not have access to the system.

Individuals may request access to their retirement records or CXone records by following the instructions in the OPM/CENTRAL-1 SORN and providing the following information: name, including all former names; date of birth; Social Security number; the name and address of the office in which he or she is currently or was formerly employed in the Federal service; and annuity, service credit, or voluntary contributions account number, if assigned. Individuals requesting access must also follow OPM's Privacy Act regulations, 5 C.F.R. part 297, regarding verification of identity and access to records.

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

Customers do not have direct access to CXone. Individuals may request that their records be corrected by following the instructions in the

OPM/CENTRAL-1 SORN and providing the following information: name, including all former names; date of birth; Social Security number; the name and address of the office in which he or she is currently or was formerly employed in the Federal service; and annuity, service credit, or voluntary contributions account number, if assigned. Individuals requesting access must also follow OPM's Privacy Act regulations, 5 C.F.R. part 297, regarding verification of identity and access to records.

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

If an individual asks a Contact Center agent how to correct their information, the agent would inform the individual how that could be done. This PIA and OPM/CENTRAL-1 SORN also provide information about how to request a correction to their records.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not be afforded adequate opportunity to correct information in CXone.

Mitigation: This risk is mitigated by providing individuals with access to Contact Center agents via the Contact Center and via the information provided in this PIA and the OPM/CENTRAL-1 SORN.

Privacy Risk: There is a risk that individuals will not be notified concerning their ability to access and amend their records.

Mitigation: This risk is mitigated through publication of this PIA, the OPM/CENTRAL-1 SORN, and via requests of RS agents who can often address an individual's concern.

Section 8.0. Auditing and Accountability

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

CXone maintains access roles for OPM personnel and contractors that restrict and grant access to information and functionality based on the user's

role in supporting the business process need. CXone captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events.

RS knows bad actors contact the Contact Center to try to steal retiree's benefits by trying to change where their benefits are sent or similar. For this reason, OPM personnel review and analyze application records, and review screen and call recordings for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions.

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

All OPM employees are required to complete annual IT Security and Privacy Awareness Training. In addition, CXone users receive content training specific to their work responsibilities, which covers the appropriate use of the information in CXone and individual user responsibility.

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

CXone administrators grant access based on approval from the user's Federal supervisor. Each user is assigned a unique user account and assigned a defined set of privileges based on the least privilege principle. The CXone administrator is responsible for ensuring the appropriate authorization has been granted for the access and the privileges requested, and for the removal of the user's privileges once that authorization has ceased.

Since the system is a System as a Service (SaaS) platform, the vendor providing the system provides the same underlying system to multiple customers. The vendor's system employees are responsible for the development, maintenance, and operation of the SaaS platform. The SaaS platform provider does not have direct access to OPM customer data on the system.

RS RIO managers document who has left the Contact Center each month and the CXone administrators will terminate access of any person who leaves OPM employment or who otherwise no longer has a business need that requires access.

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?

CXone does not interface with any other federal systems. CXone program managers will coordinate with the Office of the Chief Information Officer and with the Chief Privacy Officer, as needed, to review and assess new uses of information contained in CXone. There is currently an existing contract with NICE InContact.

Responsible Officials

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