

# Privacy Impact Assessment Voice of the Customer (VoC) Medallia

Policy, E-Government and Fair Information Practices

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# **Privacy Impact Assessment for the Voice of the Customer (VoC) - Medallia**

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## Abstract

The Office of Customer Experience (OCX) Voice of the Customer (VoC) Medallia tool provides a unified experience management system, through the Medallia Experience Cloud. This tool will allow Mission Area clients to capture in-the-moment customer feedback via numerous methods, including email surveys, receipt codes, SMS, and QR Code. The PIA is being conducted as the system may store PII depending on the Mission Area using the tool and the information collected in the surveys.

## Overview

The USDA's Office of Customer Experience is working collaboratively with USDA mission areas and offices to continue improving service levels with USDA's customers. It is being supported through USDA department-wide efforts to understand USDA customer feedback. The Voice of the Customer (VoC) platform by Medallia is a fully-functional enterprise tool designed to assist the USDA to launch a comprehensive customer experience assessment platform, enabling staff to work with large volumes of customer survey and feedback data to analyze results across all USDA mission areas and offices. The VoC tool will enable USDA staff to visualize feedback results in dynamic dashboards and allow actionable feedback for USDA officials. The VoC tool is designed to collect survey data across all the USDA mission areas. The data is structured or unstructured, solicited, or unsolicited feedback from customers through multiple channels, including but not limited to surveys, web forms, email, contact centers, in-person visits, and social media. This feedback will be collected in real-time across a customer's journey and will be placed in the VoC tool. The tool will support expansion of Voice of the Customer capabilities into other agencies and mission areas. In addition to launching the VoC tool, appropriate steps will be taken to migrate existing USDA tools (SalesForce, AskUSDA, EDAPT) or collect data in one cohesive VoC product. All appropriate security and accessibility measures will be implemented to limit, and control access based on user's roles and permission levels. A small number of users will have access to all the data across all the mission areas.

## Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

### **1.1 What information is collected, used, disseminated, or maintained in the system?**

*The data collected, used, disseminated, or maintained in the VoC tool is feedback from customers through multiple channels including, but not limited to; surveys, web forms, email, contact centers, in-person visits, and social media*

*On certain occasions or in free-form comment boxes, the VoC tool will also be collecting some limited PII including:*

- First and Last Name;*
- Email Address; and*
- Zip Code.*

*This request for PII is asked in order to better meet the needs of the customer. On some occasions, a customer may request to be contacted by a USDA official and this information will allow contact to be made. Data will never be inquired or manipulated to identify individuals or their associated PII unless a customer specifically asks to be contacted by a USDA official for a follow-up conversation.*

### **1.2 What are the sources of the information in the system?**

*The source of the VoC tool is customer survey feedback.*

### **1.3 Why is the information being collected, used, disseminated, or maintained?**

*The VoC tool is designed to collect survey data across all the USDA mission areas. The data is structured or unstructured, solicited, or unsolicited feedback from customers through multiple channels, including but not limited to surveys, web forms, email, contact centers, in-person visits, and social media.*

### **1.4 How is the information collected?**

*Information is collected through numerous methods including email surveys, receipt codes, SMS, and QR Code. Data will be ingested directly into the VoC platform and will be encrypted at rest and in transit.*

**1.5 How will the information be checked for accuracy?**

*No, the information collected will not be checked for accuracy due to the nature of the data. The data is direct feedback from customers.*

**1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

*It is required under Clinger-Cohen Act of 1996 and the E-Government Act of 2002. Guidance can be found in Appendix III to OMB Circular No. A-130 and NIST SP 800-30, Risk Management Guide for Information Technology Systems.*

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

*Risks: Minimal risk; VoC will be collect surveys in real-time across a customer's journey and will be placed in the VoC tool. The tool will support expansion of Voice of the Customer capabilities into other agencies and mission areas. In addition to launching the VoC tool, appropriate steps will be taken to migrate existing USDA tools (SalesForce, EDAPT, AskUSDA) or collect data in one cohesive VoC product.*

*Mitigation: OCX will provide access for specified USDA users across services, with capability to limit/control access based on role and permissions. The centralized location of customer feedback data can be used to power multiple channels, contacts centers, CXO dashboards, CX PMO offices, etc. These tools will run behind eAuthentication (eAuth) with a Level 2 access authority.*

## Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### 2.1 Describe all the uses of information.

*VoC will be collect surveys in real-time and will be placed in the VoC tool. The tool will support expansion of Voice of the Customer capabilities into other agencies and mission areas. In addition to launching the VoC tool, appropriate steps will be taken to migrate existing USDA tools (SalesForce, EDAPT (Data Lake), AskUSDA) or collect data in one cohesive VoC product.*

*The data collected is used to understand customer perceptions, identify key interactions with customers and to identify anomalies and trends within data with the intent of using the insights to improve USDA customer experience.*

*Additionally, VoC data will be used to:*

- Assess USDA audience sizes and segments*
- Identify current program volumes and performance metrics*
- Identify current contact channel volumes and preferences*
- Gather customer insights and feedback geographically, demographically and ethnographically in order to identify areas in need of improvement*

### 2.2 What types of tools are used to analyze data and what type of data may be produced?

*Medallia's In-Memory Analytics Engine is an optimized database technology that powers real-time analysis of enterprise-scale data. The In-Memory Analytics Engine empowers operational customer experience management by enabling thousands of concurrent users to access, analyze, and act on enormous volumes of data within a responsive, real-time platform, thereby generating broadscale user adoption.*

### 2.3 If the system uses commercial or publicly available data please explain why and how it is used.

*The system does not use commercial or publicly available data.*

### 2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.



*Information gathered is retained in the Medallia Cloud with access granted via eAuth authentication. Communication of survey information is reviewed by Mission Area program staff. Authenticated account access occurs once a user has authenticated via eAuth service.*

## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 How long is information retained?

*The retention of data in the system is in accordance with applicable USDA Records Disposition Schedules as approved by the National Archives and Records Administration and linked to the OES-2 Correspondence and Document Management System SORN. Records are maintained for varying periods of time, and temporary records are disposed of by deleting when the retention period is complete.*

<https://www.archives.gov/records-mgmt/grs.html>

### 3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

*No*

### 3.3 **Privacy Impact Analysis:** Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

*The risk to the length of time the data is retained is very low. The primary purpose of VoC is to collect surveys in real-time across a customer's journey. The surveys will not maintain data that is considered PII and there is no perceived risk.*



## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

### **4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

*The information collected in the Voice of the Customer platform will be shared internally within USDA as an aggregated representation of data depicted in visual dashboards. PII will not be included in these dashboards.*

*The information collected in the Voice of the Customer platform will be shared with USDA Senior Leadership, Data Analytics team, USDA Office Customer Experience and USDA program leaders to create dashboard reports of customer sentiment.*

### **4.2 How is the information transmitted or disclosed?**

*VoC data will never be transmitted or disclosed outside of the system. Only dashboard reports with aggregated data will be shared. Note that PII will not be shared outside of the VoC system and will not be disclosed to unauthorized users of the system*

### **4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

*There is very little to no risk associated with privacy since this application will be sharing an aggregated representation of data in visual dashboard form. Users of the VoC platform won't be able to see any of the limited PII.*

## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

*The data is not shared with any external organizations.*

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

*This does not apply as data is not shared with any external organizations.*

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

*This does not apply as data is not shared with any external organizations.*

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

*This does not apply as data is not shared with any external organizations.*

## Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

**6.1 Does this system require a SORN and if so, please provide SORN name and URL.**

*This system does not require a SORN.*

**6.2 Was notice provided to the individual prior to collection of information?**

*When filling out a USDA feedback survey, it will be implicit to the customer that their feedback will be collected and analyzed.*

**6.3 Do individuals have the opportunity and/or right to decline to provide information?**

*Yes. The information provided by the user is completely voluntary.*

**6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

*If individuals do not consent to all uses of their voluntarily provided information, they have the right to decline to participate.*

**6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

*There are no risks associated with individuals providing customer feedback data. This information is completely voluntary.*

## Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

*Not applicable: there are no procedures that would allow individuals to gain access to their information. There isn't any information being gathered besides voluntary user feedback.*

**7.2 What are the procedures for correcting inaccurate or erroneous information?**

*N/A*

**7.3 How are individuals notified of the procedures for correcting their information?**

*N/A*

**7.4 If no formal redress is provided, what alternatives are available to the individual?**

*N/A*

**7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

*There are minimal privacy risks, but the system has built in security and access controls to ensure only authorized personnel have access to the data. The access controls also multiple roles and access levels.*

## Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

### **8.1 What procedures are in place to determine which users may access the system and are they documented?**

*Users of the VoC platform will be selected based on their mission need to access the system and their permission levels. Approved USDA employees will undergo in-person training on platform functionality, privacy, and security controls. Before users gain access to the system, they must be provided a license and their permission will be documented in a database file.*

### **8.2 Will Department contractors have access to the system?**

*Yes*

### **8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

*All USDA employees must complete Information Security Awareness and Rules of Behavior Training before they are granted access to the system. The Rules of Behavior outline USDA's privacy requirements. Each time the user logs on to a workstation a splash screen appears that stresses privacy information security. The user must acknowledge this before the user is able to continue. Annual refresher training is provided through AgLearn. There is annual ISA training which includes Privacy.*

### **8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

*No. This system is currently in development and requires a PIA to become accredited.*

### **8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

*Data is encrypted at rest in the database as well as the file system and an audit trail of all application activities is tracked via logs. Audit logging and security concerns are inherited from Medallia and do will not affect USDA.*

### **8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

*Given the limited collection of PII included in voluntary customer feedback and the high level of training and access controls that personnel will receive prior to receiving access to the system, the risk associated with the Medallia tool are low to non-existent.*

## Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

### **9.1 What type of project is the program or system?**

*This is a moderate impact Feedback Management system that allows USDA customers and employees to leave comments and feedback for USDA leadership to analyze and/or act on.*

### **9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.**

*N/A*

## Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

- 10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

*Yes*

- 10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

*This does not apply as 3rd party websites and applications are not used.*

- 10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

*This does not apply as 3rd party websites and applications are not used.*

- 10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

*This does not apply as 3rd party websites and applications are not used.*

- 10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

*This does not apply as 3rd party websites and applications are not used.*

- 10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

*This does not apply as 3rd party websites and applications are not used.*



**10.7 Who will have access to PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications?**

*This does not apply as 3rd party websites and applications are not used.*

**10.8 With whom will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

*This does not apply as 3rd party websites and applications are not used.*

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

*This does not apply as 3rd party websites and applications are not used.*

**10.10 Does the system use web measurement and customization technology?**

*No*

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

*Participating in feedback surveys is completely voluntary. Users can opt-out of all uses of web measurement technology by simply not responding to the surveys. These surveys are not mandatory in any way.*

**If so, does the agency provide the public with alternatives for acquiring comparable information and services?**

*N/A*

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

*Privacy impact is low as 3rd party websites and applications are not used.*

## Responsible Officials

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Tamieca Hamlin  
System Owner  
Office of Customer Experience  
United States Department of Agriculture

## Approval Signature

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Departmental Administration Information  
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