



Adapted Privacy Impact Assessment

Rideshare Program

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Contact

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One Privacy Impact Assessment (PIA) may be prepared to cover multiple websites or applications that are functionally comparable as long as agency or bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the Office of the Chief Information Officer (OCIO) for review and approval.

SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

- 1.1 What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

The General Services Administration (GSA) partnered with Uber (Uber for Business [U4B]) and Lyft, Inc. (Lyft Business System [LBS]) to provide transportation solutions and services to agencies' federal employees through the platforms that leverage each Rideshare/Ride-hail provider's existing web-based dashboard, infrastructure, and driving community. GSA conducted privacy and security checks for LBS and U4B and the PIAs can be found at <https://www.gsa.gov/reference/gsa-privacy-program/privacy-policy-for-nonfederal-systems>. BSEE is conducting this assessment to address issues specific to its uses of the services.

The Rideshare Enterprise Program [Rideshare Program] will be managed by the Finance Division and Support Services Branch, Management Support Division, of the Bureau of Safety and Environmental Enforcement (BSEE). Support Services will replace the shuttle service with the Rideshare Program to provide transportation service between the Headquarters buildings in Washington DC and Sterling VA or between Sterling VA and authorized locations in Washington DC area such as Capitol Hill [Shuttle Service] to its employees and that of the Bureau of Ocean Energy Management (BOEM). BSEE and BOEM employees may only use the Shuttle Service for official business purposes such as attending meetings or conducting business at either location; employees cannot use the rideshare program as part of their commute from their residence to the worksite. Payment for Shuttle Service rides will be managed by Support Services.

The Rideshare Program will also be available to employees for authorized travel while on official temporary duty [TDY] travel. TDY rides will be charged to a traveler's Citibank Government Travel Card. Finance will manage the TDY Rideshare Program.

- 1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

BSEE and BOEM employees are responsible for using rideshare/ride-hail services in accordance with applicable laws, regulations, and policies. Legal authorities that authorize rideshare/ride-hail services include 5 U.S. Code 301, Departmental Regulations, 31 U.S. Code § 3901; Prompt Payment, Definitions and Applications; and



OMB M-10-23, Guidance for Use of Third-Party Websites and Applications, June 25, 2010.

SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

2.1 What PII will be made available to the agency?

BSEE and BOEM employees must consent to allow the providers to share trip-level data from their Rideshare Program profile with BSEE. The dashboards will allow Rideshare Program administrators from Finance and Support Services [Administrators] to view trip-level details such as name, business email address, pick-up/drop-off location, distance, duration, selected vehicle type, and payment method, fare, taxes and fees. Employees may opt to share their mobile number.

2.2 What are the sources of the PII?

For the Shuttle Service, Administrators will initially obtain employee names and government email addresses from the Federal Personnel and Payroll System to provide to Lyft and Uber for entry into the LBS or U4B dashboards. Administrators will be included in the onboarding process for new BSEE and BOEM employees assigned to the Headquarters buildings for manual entry into the dashboards.

For TDY, Administrators will create a list of BSEE and BOEM government-issued travel cardholders from CitiManager to provide to Lyft and Uber for entry into the LBS or U4B dashboards. The Administrators will manually enter new travel cardholders into the dashboards.

Invitations will be sent from each provider for employees to participate in the Rideshare Program. Employees may opt-in to join either or both providers. Employees who accept the invitation will need to link their personal account to the BSEE Rideshare Program and to consent to allow the provider to share trip-level data from their Rideshare profile with BSEE. Employees who do not already have a personal account will need to create one preferably using their non-government email. NOTE: Administrators cannot view trip details taken under the personal profile.

The dashboard for each provider will have four separate segments for Administrators to view ride details under the Rideshare Program:

- BSEE MIB – Sterling
- BOEM MIB – Sterling
- BSEE TDY
- BOEM TDY

As applicable, employees may receive invitations to join both the Shuttle Service and TDY segments however they will only have one Rideshare Program profile and can select the appropriate segment when requesting transportation.



Employees will be able to toggle between their personal profile and Rideshare Program profile. A banner warning will appear when the Rideshare Program profile is selected for use to ensure the proper rider profile is used.

2.3 Will the PII be collected and maintained by the agency?

No, employee information will be maintained on the LBS and U4B platforms. Administrators will use the dashboards to view and manage Rideshare Program profiles and trip-level details. Administrators will not maintain or manage Rideshare Program data outside of the dashboards. However, under rare circumstances such as improper use of the Rideshare Program, investigative activities may require the collection or maintenance of PII by BSEE outside of the dashboards.

2.4 Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, the Paperwork Reduction Act is not triggered by these services.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

Administrators will initially provide employee name and BSEE or BOEM email address to Lyft and Uber for entry into the Rideshare Program dashboards. This information is necessary for authentication and verification purposes to enable employees to securely establish a Rideshare Program profile with the provider. Employees must consent to share Shuttle and TDY trip details with BSEE by linking their existing personal account. Once the Rideshare Program profile is established the employee can request Shuttle or TDY rides. Administrators can view trips on the dashboards and have visibility into trip information in one place, streamlining receipt and approval tracking.

Administrators will ensure that employee names and BSEE or BOEM email addresses are accurate and complete in the Rideshare Program dashboards. If an employee email is entered incorrectly, the employee will not receive an invitation and the invite will appear as pending on the dashboard. A pending invite status will also occur if the employee receives the invite but declines to participate. Administrators may delete pending invites or unlink an employee from the Rideshare Program. An employee may unlink their Rideshare Program profile at any time from their personal rider profile.

The Rideshare Program dashboards will allow Administrators to view transaction reports with ride details such as name, business email address, selected vehicle, pick-up/drop-off location, distance, duration, selected vehicle type, and payment method, fare, taxes and fees. Administrators will manage access, rider permissions, set payment options, and establish spending limits.

Once the program has been implemented, Administrators will use the onboarding or travel cardholder application process to add eligible employees to the Shuttle Service, TDY or both. Administrators will be included in the Exit Clearance process to deactivate



former employees from the Rideshare Program and maintain those records in accordance with the prevailing records retentions schedules.

3.2 Provide specific examples of the types of uses to which PII may be subject.

Typically, a rideshare service collects information directly from individuals and specifies the minimum required PII and other data needed to establish or maintain a rider profile and account. However, the Rideshare Program does not collect PII directly from employees; Administrators will provide the names and BSEE or BOEM email addresses. The name and email address are necessary for authentication and verification processes. During the linking process, employees provide consent for the providers to share trip-level details from their Rideshare Program profile with BSEE through the dashboards. While Administrators will have access to rider transactions on the platform, Rideshare profile information is limited to name and business email address; Administrators will not have access to personal usage of the rideshare services.

Administrators can view trips on the dashboards and have visibility into trip information to include pick-up/drop-off location, distance, duration, selected vehicle type, and payment method, fare, taxes and fees. Administrators can configure the platform from the dashboards such as managing administrative access and permissions to the platform, adding/deleting authorized riders, setting payment options, and establishing spending limits.

Administrators will set policies for usage of the providers, Rideshare Program profiles, spending allowance, trip allowance, time of day/week, and vehicle type. Administrators may also set geofence restrictions to help ensure that trips are limited to specific destinations (i.e., Shuttle rides). Once geofence parameters are set, the trip cannot occur outside those parameters.

Employees can toggle between using their Rideshare Program profile and personal profile at any time. Charges for trips mistakenly taken on either profile can be corrected by employees who contact the Rideshare provider to correct the charge. Note: Administrators cannot view details about trips taken on an individual's personal profile.

SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

BSEE will not share PII with entities or persons outside of DOI. However, if there is evidence of employee violation of DOI policy or criminal activity, that information may be shared with appropriate officials or law enforcement organizations under the routine uses documented in the applicable Privacy Act system of records notice (SORN). The evidence may include employee name and trip details.



The invitation will contain links to the Lyft and Uber privacy notices. The notices outline what PII and other data are collected from users and how the information is used to manage and improve their services. Generally, the information may be shared as follows:

- Profile information to ensure that the right person is getting into the right car
- Communication between drivers and riders which connect calls and texts using masked numbers
- When obligated, such as in response to valid law enforcement request

In certain jurisdictions, and where permitted by law, users can record the audio and/or video of their trips through an in-app feature or using a dashcam. In app recordings are encrypted and stored on users' devices and are only shared with if submitted to customer support by the users in connection with safety incidents. Notice must be given prior to recording.

Drivers do not have access to rider profiles, pick-up/drop-off locations after completion of a trip.

Rideshare program profiles are not sent marketing communications from the providers.

- 4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

Access to the Rideshare Program dashboards is limited to Administrators to manage the program. Prior to access being granted, they are required to complete both privacy awareness and role-based privacy training, then annually thereafter.

SECTION 5: Maintenance and Retention of PII

- 5.1 How will the agency maintain the PII, and for how long?

The Rideshare Program will be maintained under two records retention schedules approved by the National Archives and Records Administration (NARA):

- Short Term General travel and transportation records, including: routine administrative records pertaining to commercial and noncommercial agency travel/transportation; records documenting the issue or receipt of accountable documents; Short-term Financial and Acquisition Records Disposition Authority Number DAA-0048-2013-0001-0010 temporary 3 years.
- Travel records documenting the movement of goods and persons. The records include bills of lading, transportation requests, transportation vouchers, per diem vouchers, travel authorizations, and all supporting documentation. This item DOES NOT include passport records, transportation subsidy files, or routine administrative travel files identified in 0010 - Long-term Financial and Acquisition Records Disposition Authority Number DAA-0048-2013-0001-0011 temporary 7 years.



5.2 Was the retention period established to minimize privacy risk?

The retention schedules which cover records under the Rideshare Program were already established by the DOI to meet the business needs of the agency and considered the risks to privacy.

SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

Access to the Rideshare dashboards is limited to Administrators who manage the program. Prior to access being granted, they are required to complete both privacy awareness and role-based privacy training, then annually thereafter. Timely completion of training is monitored by privacy and security.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

Any PII maintained by the Rideshare Program is safeguarded in accordance with DOI privacy and security policies. Access is restricted to authorized Administrators using password authentication controls. The service providers' servers are located within the United States in secure facilities behind restrictive firewalls.

SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1 What other privacy risks exist, and how will the agency mitigate those risks?

Lyft and Uber are private third-party applications. Both require their employees to complete privacy training to protect personal information. The training covers privacy and security practices and policies relating to physical and cyber security, data access, privacy by design, data minimization, retention and disposal, notice and transparency, consent, and data accuracy.

They maintain a privacy program overseen by their Chief Privacy Officers. This privacy program includes efforts from their privacy engineering and privacy legal teams, working to enforce privacy as a routine key consideration early in product and engineering life cycles and to advise other teams regarding privacy and data protection requirements.

Agencies and businesses use LBS and U4B enterprise platforms to meet their employee and client transportation needs. Both providers use separate, dedicated, highly trained teams to manage the enterprise platforms from the teams that manage the platforms used by the public. This separation limits access to enterprise platform data to promote trust and improve compliance with security and privacy controls.



There is a risk that email addresses are entered incorrectly resulting in an employee being unable to opt-in to the Rideshare Program. Administrators can view the status of each invitation. An incorrect email would keep an invitation in a pending status which Administrators can correct and send an invitation to the updated address.

There is a risk that new employees will not receive timely invitations to join the Rideshare Program or former employees remain as active participants. Administrators will use the On-Boarding and Exit Clearance processes to maintain the accuracy of active participants.

There is a risk that participants could use the incorrect profile to request a ride. Administrators will be conducting training sessions and provide Rideshare Program resources. Employees will learn how to toggle between their personal and Rideshare profiles and will be informed that a warning banner will appear whenever they select the Rideshare profile to request a ride.

- 7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of the third-party website or application?

Yes. The invitation will provide notice describing the Rideshare Program for authorized Shuttle and TDY use. Employees will be informed that this is an optional program that requires consent to link their Rideshare Program profile to their personal account. This consent allows the providers to share details (e.g., pick-up/drop-off location, option selected, trip duration etc.) with Administrators for trips taken under their Rideshare Program profile.

Employees will be notified that a personal account with the provider is required to participate in the Rideshare Program. Employees who do not already have a personal account but wish to participate in the program will be required to create one. It is not recommended that the BSEE or BOEM email address is used to create the personal account. Both providers use separate, dedicated, highly trained teams to manage security and privacy controls and promote trust for their enterprise platform used by agencies and businesses to meet their employee and client transportation needs.

Links to the Lyft and Uber privacy notices will be made available in the invitation. BSEE will review any changes to their privacy policies and communicate significant changes with BSEE and BOEM employees.

SECTION 8: Creation or Modification of a System of Records

- 8.1 Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?

No. INTERIOR/DOI-58, Employee Administrative Records, 64 FR 19384 (April 20, 1999); modifications published 73 FR 8342 (February 13, 2008) and 86 FR 50156



(September 7, 2021), system of records notice (SORN) covers the uses of the Rideshare Program under the Privacy Act of 1974.

8.2 Provide the name and identifier for the Privacy Act system of records.

Privacy Act SORN INTERIOR/DOI-58, Employee Administrative Records, covers use of employee information maintained in the Rideshare Program. The SORN may be found at <https://www.doi.gov/privacy/doi-notices>.