AmeriCorps
Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information system:	AmeriCorps Public Websites
1-2	System Identifier (3 letter identifier):	PUB
1-3	Unique Investment Identifier (Exhibit 53):	485-000000017
1-4	Office or entity that owns the system:	Office of Information Technology (OIT) - Web Services
1-5	Office or entity that manages the system:	OIT - Web Services
1-6	State if the system is operational or provide the expected launch date:	Operational
1-7	System's security categorization:	Low
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	May 1, 2022
1-9	Approximate number of individuals with PII in the system:	AmeriCorps' PUB database maintains personally identifiable information (PII) about approximately 33,000 individuals who completed one of the webforms hosted on Americorps.gov or were included in one of those forms.

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)			
	Role	***Signature***	***Date***
3-1	**System Owner:**		
3-2	**Office of General Counsel:**		
3-3	**Chief Privacy Officer:**		
3-4	**Chief Information Security Officer:**		
3-5	**Senior Agency Official for Privacy:**		

4- PIA HISTORY		
4-1	**State whether this is the first PIA for the system or an update to a signed PIA.**	
	This is an update to an existing system with a prior signed PIA.	
4-2	**If this is an update, describe any major system changes since the last PIA.** **If this is the first time a PIA is being completed, write <u>Not Applicable</u>.**	
	The PIA now indicates that the system processes PII.	

5- SYSTEM PURPOSE	
5-1	**Describe the purpose of the system.**
	AmeriCorps Public Websites (PUB) provides Internet web hosting services for publicly available and largely static web content managed by AmeriCorps. It is comprised of www.AmeriCorps.gov, connect.americorps.gov, and learn.americorps.gov websites. The learn.americorps.gov website is specifically used to publish publicly available training material in web-based content, while the connect.americorps.gov website publishes contents about AmeriCorps VISTA Connect where individuals interested in AmeriCorps VISTA program can learn and interact more with this program. To promote open data initiative, encourage individuals' participation and continuously improve public confidence in AmeriCorps' programs' outreach in the communities, some PUB webpages carry hyperlinks to third-party websites that AmeriCorps does not endorse yet any visitors to PUB can choose to view and utilize at their own discretion.

Links to Socrata, an enterprise and open data platform service that AmeriCorps procures to be used by the Data.AmeriCorps.gov where individuals can access the data made available by AmeriCorps, are provided so that the visitors to AmeriCorps website can utilize the tool to easily manipulate and analyze the data. There are also links to forms managed by GovDelivery that individuals can complete if they want to subscribe to an AmeriCorps listserv email or SMS/text messaging service. GovDelivery maintains this user subscription information on behalf of AmeriCorps, per the contractual requirement for the digital subscription management service through a web-based platform that AmeriCorps procures from FedRAMP certified vendor.

PUB runs on Drupal content management system hosted by Acquia as a part of a platform as a service (PaaS) within Amazon Web Services Cloud - a Fed RAMP Cloud environment.

6- INVENTORY OF PII	
6-1	**Provide a list of all the PII included in the system.**
	The PII in PUB includes: - Names - Contact information (e.g., emails, phone numbers, physical addresses) - Photos - Age ranges - Employer information, job titles, and roles Social media handle, photos and/or videos are not requested. AmeriCorps may follow up with an individual for photos in response to submitting Share Your Service Story form at https://americorps.gov/newsroom/stories/share-your-service-story.

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM	
7-1	**Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.**
	PUB maintains PII of individuals of a range of different groups, including (1) individuals who work for organizations that run volunteering events, (2) individuals whose volunteering is connected to AmeriCorps, (3) individuals who work for

organizations that want to hire current and former service members of AmeriCorps programs, (4) individuals who applied to become service members, (5) former service members, and (6) individuals interested in AmeriCorps. Almost all the collections request the name and contact information of the individual who provides information in the forms.

Some collections, submitted by an employee on behalf of their organization (e.g., company or mayoral office), ask for names and contact information of other staff within that organization.

Some collections, submitted by an employee on behalf of an organization running an event, ask for names of the VIPs, political figures, and community leaders who did or will attend the event.

Some collections, submitted to thank a second or third party for their service or nominate them to receive an AmeriCorps award, ask for the award recipient's name, contact information, age bracket, and information about their service.

In total, PUB's database stores PII from approximately 33,000 individuals who completed one of the AmeriCorps-hosted online form or had a form completed about them.

GovDelivery stores PII from approximately one million individuals who subscribed to an AmeriCorps listserv.

8- INFORMATION IN THE SYSTEM	

8-1	**For each category of individuals discussed above:**
	    a. **Describe the information (not just PII) collected about that category.**
	    b. **Give specific details about any PII that is collected.**
	    c. **Describe how the information is used.**

	The current AmeriCorps-hosted online forms on the PUB website are as follows: • Accessibility Feedback: This online form collects information from anyone who wants to report a website accessibility concern. It collects the submitter's

name (required), email address (required), the web address of the web page which has accessibility issue and the feedback of concerns. This information goes to AmeriCorps' 508 Coordinator for review.

- [Schools of National Service Commitment Form](): This online form collects information from colleges and universities that want to become a School of National Service. A School of National Service provides a match, scholarship, or other benefit to AmeriCorps alumni at their institution. This includes information about the school and planned program benefit, the full name, email, phone number and fax number (optional) of the contact person, the optional information of the full name, email, phone number and fax number of the individual who will certify the commitment form and the signature and date for a committed timeframe. This information is sent to AmeriCorps personnel in the Office of Strategic Engagement who further discuss and confirm the academic institution's information and commitment before posting some information about the school on AmeriCorps' website (including the point of contact's name and contact information). Once enrolled, schools can update their information at any time by contacting SegalAward@cns.gov.

- [Share your Service Story](): This online form collects information from any individuals who volunteered in connection to AmeriCorps and want to share their story. It collects the submitter's member category information, name (required), email address (required), organization name and website, and the story the submitter shares. This information is sent to AmeriCorps' press team who may choose to work with the submitter to expand their story and publish it on PUB (only their full name and story). Each submitter must agree to terms and conditions which explain that their submission is voluntary, and AmeriCorps may publish all or part of their story. Each submitter has an opportunity to talk to AmeriCorps' press team before their story is published. In addition to being sent to [digitalmedia@cns.gov](), submissions are downloaded to SharePoint regularly and then cleared from Drupal.

- [Employers of National Service - Sign up](): This online form collects information from organizations that promote hiring individuals who served in AmeriCorps, Peace Corps, or similar. It collects the business information of the employer, the employer's programmatic coordinators' name, title, email and phone number, and information about organization's hiring practices and

its interest of participation in the program initiative. This information is sent to the web team of AmeriCorps which will connect with the submitter and discuss their application before posting the information on AmeriCorps' website and elsewhere. All individuals who complete the online form must agree to the terms and conditions provided on the online form which explain that their submission is voluntary, and AmeriCorps may share their information with listed recipients. The webpage containing the online form also lists an email in case interested organizations have questions about the form or their submission.

- National Service Recognition Day Registration: This online form collects information from organizations that work with AmeriCorps to promote volunteer opportunities on National Service Recognition Day. Some of these organizations are grantees while others have no connection to AmeriCorps apart from promoting the National Service Recognition Day. This form collects information about the project including the location, number of participants, accomplishments, and any photos or videos. It also requests the name, title, email, and phone number of any senior administration or elected officials who attended the project. AmeriCorps uses this information internally to understand what events occur to celebrate Recognition Day and evaluate the success of the Day.

- Event Submission: This online form collects information about organizations that have special events which are not connected to the Martin Luther King (MLK) Day of Service or September 11th National Day of Service and Remembrance. It collects the name of the organization, address and type of event, a point of contact (name, email address, and phone number), and the names of any VIPs who attended. The information goes to the Office of Government Relations and Strategic Engagement and the Senior Advisor for Partnership and Outreach of AmeriCorps, via events@cns.gov, where it is used to help AmeriCorps collaborate with the organizations that run the events. In addition to being sent to events@cns.gov, submissions are downloaded to SharePoint regularly and then cleared from Drupal.

- AmeriCorps NCCC Questions: This online form collects questions from the public about the AmeriCorps NCCC program and their contact email

addresses. Their collected information is sent to AmeriCorps NCCC inboxes: NCCCMedia@cns.gov and ANCCC@cns.gov.

- Harris Wofford Joint Service Award: This online form collects information from AmeriCorps and Peace Corps alumni who are applying for the award. It collects their name, email, phone number, story, and programs they served in. The information is sent to engagement@cns.gov. .

- Join NCCC -Connect with US Form: This online application form collects name and email address of the applicants and other program related information.

The website had several AmeriCorps-hosted online forms that are no longer open to the public, but AmeriCorps continue to retain the information within Drupal database to reference back as necessary:

- The MLK Day of Service Project Report collected information about past MLK Day events, including the names of any senior administrators or elected officials who attended the project.
- The Recognition Day Event Tracker form collected information about past National Service Recognition Day events, including the names of any senior administrators or elected officials who attended the project.
- The Day of Service Event Report form collected information about accomplishments from past Day of Service events, including the point of contact for the event (name, phone number, and email) and the names of any senior administrators or elected officials who attended the project.
- The AmeriCorps Search Tool Feedback collected general feedback; the emails that people could have provided when completing the form are no longer stored.
- Sign up to be an AmeriCorps Ambassador: This online form collects information from the alumni of AmeriCorps VISTA program who want to promote VISTA. It collects their name, address, dates and location of service, shirt size, and information about at least one planned outreach event.

PUB hyperlinks to Socrata, a SaaS platform service that AmeriCorps procures to operate at another AmeriCorps website - data.americorps.gov. Anyone can visit data.americorps.gov and download AmeriCorps-provided data or use it to create

various data renderings (e.g., charts, maps, graphs). Those visitors can also use Socrata to submit a form to an AmeriCorps staff member about a dataset. The form collects the visitor's email address along with their message, and forwards that to the AmeriCorps staff member representing the dataset, then deletes the form information.

PUB also incorporates several embedded forms and links to forms hosted by GovDelivery:

- Most forms collect a phone number or email address from individuals who want to subscribe to one of AmeriCorps listserv's which are managed by GovDelivery. Some forms may also request the individual's first name, age bracket, state of residence, and what AmeriCorps programs interest them. Individuals who provide their first name will receive emails with their name. The other questions are answered by selecting from a predefined list and determine which information they want to receive. Individuals are not required to provide their name, age bracket, state of residence, or program interest to sign up.
- There is one embedded form on the AmeriCorps NCCC Join page. This form asks for first and last name, email, program of interest, position of interest, intended start date, and age.
- There is one embedded form called Join AmeriCorps NCCC Connect with Us Form: AmeriCorps NCCC uses this form to help prospective applicants who want to start the process of registering and applying for services with the program. We use this information to connect with these individuals directly through GovDelivery. This user data is never moved outside of the GovDelivery system.

A disclaimer on each embedded form, and a popup when individuals link to a GovDelivery page, states: AmeriCorps uses GovDelivery to store your contact information and subscription preferences (Privacy Policy).

9- COLLECTIONS OF PII INTO THE SYSTEM	

9-1	**Describe for each source of PII in the system:**
	    a. **The source.**
	    b. **What comes from that source.**
	    c. **How the PII enters the system.**

	All the PII collected by PUB come from members of AmeriCorps program or public individuals who are interested in the programs of AmeriCorps.
9-2	**If any PII comes directly from the individual, describe the privacy controls in place. If all PII comes from a secondary source, write <u>Not Applicable</u>.**
	Each collection of PII: • Explains the general purpose of that collection; • Clearly states what PII should be included in response to each question and generally has a separate text box for each item of PII; • Include a link to AmeriCorps' privacy webpage which includes AmeriCorps' privacy policy and invites individuals to contact privacy@cns.gov if they have any privacy-related questions; and • Collects all PII through a secure internet connection. The Share Your Service Story and Employers of National Service form online forms include a notice that explains where the information may be shared; the submitter must read and acknowledge that before submitting the form. Apart from links that go to other Federal agency websites and links embedded in YouTube videos and PDFs, individuals who click a link from an AmeriCorps website to a non-Federal agency owned website see the following notice: *The website you're going to is not part of the AmeriCorps domain and may not be under AmeriCorps' control. Its privacy and security practices and policies may differ from AmeriCorps'. AmeriCorps is not responsible for the link, nor does it endorse the content of the third-party website.* *Click on the continue button to proceed to the external website; otherwise click cancel to stay on AmeriCorps.gov.* The Join NCCC -Connect with Us form includes the following privacy notice: *NCCC is required by the Privacy Act of 1974 (5 U.S.C.552a) to tell you what personal information we collect in this form and how it will be used: Authorities – We are requesting your personal information (your name and*

	email address) pursuant to 42 U.S.C. Chapter 129 – National and Community Service and 42 U.S.C. Chapter 66 – Domestic Volunteer Services. *Purposes – NCCC requests this personal information to help us manage your pre-application for service, the resulting agency support you will receive when applying, and to help evaluate our application processes.* *Routine Uses – Routine uses of your personal information may include Disclosure to the vendor that we use to send out emails and other reasons consistent with the system of records notice (SORN).* *Effects of Nondisclosure – This request is voluntary; if you do not complete this form, you will not receive emails with guidance about the application process.* *Additional Information – The application SORN is:* CNCS-04-CPO-MMF-Member Management Files (MMF) [85 FR 3896] at https://www.federalregister.gov/documents/2020/01/23/2020-01080/privacy-act-of-1974-system-of-records. For web pages with links to YouTube video, a notice beneath each embedded YouTube video says: *The above video may include external links to YouTube's video platform. YouTube's privacy and security practices and policies may differ from AmeriCorps'. AmeriCorps is not responsible for these links nor does it endorse the content of the third-party website.* [Find out more](#).

9-3	**If PII about an individual comes from a source other than the individual, describe:**
	    a. **Why the PII is collected from the secondary source.**
	    b. **Why the PII from the secondary source is sufficiently accurate.**
	    c. **If/how the individual is aware that the secondary source will provide their PII.**
	If all PII about an individual comes directly from the individual, write Not Applicable.

	A few AmeriCorps-hosted online forms are intended for an organization's representative and ask for certain contact information of employees beyond the representative completing the form. The Employers of National Service, Schools of National Service, National Service Recognition Day, and Event forms all ask the user to submit information that speaks for themselves and possibly others. For example, names of local officials, backup contacts, or names of representatives that may not be

		the person completing the form. A few forms ask for the names of VIPs, political figures, and community leaders who attended an event. AmeriCorps will not post any information collected through these forms until they contact the submitter to confirm that the information is correct. The website does not currently have any collections that ask for names of individuals who should be thanked or recognized for their service.
9-4		**If any collections into the system are subject to the Paperwork Reduction Act (PRA), identify the Office of Management and Budget (OMB) Control Number for the collection. If the system does not implicate the PRA, write <u>Not Applicable</u>.**
		- The [Schools of National Service Commitment Form](#) displays OMB Control Number 3045-0143. - The [Share Your Service Story](#) form displays OMB Control Number 3045-0122. - The [Employers of National Service](#) form displays OMB Control Number 3045-0175. - The [AmeriCorps NCCC Questions](#) form displays OMB Control Number 3045-0010. - The [National Service Recognition Day](#) form displays OMB Control Number 3045-0122. - [Event Submission](#) form displays OMB Control Number 3045-0122.
9-5		**If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.**
		The Memorandum of Understanding between AmeriCorps and Acquia, Inc. The Interconnecting Security Agreement between AmeriCorps and Acquia, Inc.

10- SYSTEM ACCESS	

10-1	**Separately describe each category of individuals who can access the system along with:**
	   a. What PII they can access (all or what subset).
	   b. Why they need that level of access.
	   c. How they would request and receive that access.
	   d. How their access is reduced or eliminated when no longer necessary.

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When an AmeriCorps-hosted online form is submitted, the information goes to one or more authorized AmeriCorps staff members and/or shared AmeriCorps email accounts. Each quarter, the web team emails all individual accounts to confirm that the correct recipients are listed. The web team does not email the shared accounts because an AmeriCorps staff member manages each account and can add and remove access at any time. Staff who leave the agency lose access to all these email accounts. The information collected into each form is also saved to the PUB database. Only about three AmeriCorps staff who manage the website have access to that PUB database and will lose that access if they leave AmeriCorps.

All PII collected from subscribers to an AmeriCorps listserv goes to a GovDelivery account managed by AmeriCorps. Fewer than 10 AmeriCorps staff have access to the PII collected to run those listservs. The AmeriCorps staff member who manages the GovDelivery account will remove an employee's access when that employee leaves AmeriCorps and periodically checks whether those with access continue to need that access.

11- PII SHARING

11-1	**Separately describe each entity that receives PII from the system and:**
	    a. **What PII is shared.**
	    b. **Why PII is shared.**
	    c. **How the PII is shared (what means/medium).**
	    d. **The privacy controls to protect the PII while in transit.**
	    e. **The privacy controls to protect the PII once received.**
	    f. **Any agreements controlling that PII.**
	If PII is not shared outside the system, write <u>Not Applicable</u>.

	The information that users submit through AmeriCorps-hosted online forms are sent to designated AmeriCorps personnel in charge of processing this information who would save it to the PUB database. All content and associated information submitted by the users and stored in GovDelivery remains the sole property of AmeriCorps. The information is handled in a secure manner, per the requirements set forth by GovDelivery digital communication service contract between the vendor and AmeriCorps that is executed in full compliance with Privacy Act of 1974. The vendor is prohibited from sharing any information belong to AmeriCorps with third parties.

12- PRIVACY ACT REQUIREMENTS	

12-1	**If the system creates one or more systems of records under the Privacy Act of 1974:**
	    a. **Describe the retrieval that creates each system of records.**
	    b. **State which authorities authorize each system of records.**
	    c. **State which SORNs apply to each system of records.**
	If the system does not create a system of records, write <u>Not Applicable</u>.

	The information collected via Connect to Start Application form on AmeriCorps NCCC page which can be retrieved by name in combination with other information provided by the individual applicant are covered by SORN <u>CNCS-04-CPO-MMF-Member Management Files (MMF).</u> The legal authorities are 42 U.S.C. Chapter 129—National and Community Service, 42 U.S.C. Chapter 66—Domestic Volunteer Services, and Executive Order 9397, as amended.

13- SAFEGUARDS	
13-1	**Describe the technical, physical, and administrative safeguards that protect the PII in the system.**
	AmeriCorps has implemented series of administrative, technical and physical controls to safeguard PUB and the information it maintains. Specifically, in order to maintain good security and privacy compliance poster, AmeriCorps requires all AmeriCorps employees and contractors who handle PII to complete annual privacy and security training provided by AmeriCorps. AmeriCorps website owners are required to complete additional security training. The PUB database that maintains a copy of the information collected through the online forms is in the Acquia Cloud Environment (ACE) which is FedRAMP - Federal Risk and Authorization Management Program approved. The infrastructure utilizes a virtual server that decouples the hardware and software layers, protected by redundant firewalls, log correlation, and intrusion detection tools. The ACE also conducts a fully compliant continuous monitoring program that includes monthly scanning and annual audit and penetration testing. The ACE meets security requirements for data protection. Access control is strictly enforced based on business need and least privilege principles, AmeriCorps' staff members' access to the system is limited to only those employees who are trained in the system. Acquia employees have no access to the AmeriCorps environment. There are MOU and ISA between AmeriCorps and Acquia which set forth rules of behavior and detailed compliance requirements for the two parties, including incident reporting, security policy, data protection, etc. FIPS 140-2 approved encryption mechanisms is required to protect the information transfer between the PUB website and the Acquia Cloud. AmeriCorps' staff members are

expected to comply with AmeriCorps Cybersecurity Rules of Behavior in order to protect the data and information for AmeriCorps in accordance with the Privacy Act and Trade Secrets Act (18 U.S. Code 1905) and the Unauthorized Access Act (18 U.S. Code 2701 and 2710)..

AmeriCorps embeds GovDelivery form to store email subscriber information. GovDelivery is both ISO27001 certified and FedRAMP approved that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services. The infrastructure utilizes a virtual server that decouples the hardware and software layers, protected by redundant firewalls, log correlation, and intrusion detection tools. In addition, GovDelivery conducts a fully compliant continuous monitoring program that includes monthly scanning and annual audit and penetration testing, the results of which are sent directly to FedRAMP so that they can confirm compliance. A limited number of the staff who work for the GovDelivery digital communication service provider can only access the user information in order to provide services in accordance with the requirements stipulated in its service contract with AmeriCorps, which is fully executed in accordance with the Privacy Act of 1974.

Socrata is also FedRAMP approved. An internal team of security analysts continually monitors for vulnerabilities and attackers and outside assessors confirm whether the internal team is meeting those requirements.

14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
14-1	**Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.**
	Information that PUB collects which could affect an individual is generally collected from that individual. In all other situations, AmeriCorps will contact the individual (or employer if a form is completed on behalf of an employer) to confirm that their information is accurate. Individuals can access their GovDelivery account through a link (https://public.govdelivery.com/accounts/USCNCS/subscriber/new?preferences=true#tab1) on each message (email or text message) to change their subscription settings and/or update their contact information.
14-2	**Describe how an individual could view, correct, update, or ask to amend their PII.**

The AmeriCorps-hosted online forms do not give individuals the option to retrieve and correct the information they submitted, but they can submit a second form to update the first form.

Individuals can access their GovDelivery account through a link on each message (email or text message) to change their subscription settings and/or update their contact information.

All PUB collections of PII are either (a) on a webpage that provides link to AmeriCorps' privacy webpage or (b) a popup from a page with a link to AmeriCorps' privacy webpage. AmeriCorps' privacy webpage lists a point of contact who can respond to any privacy concerns raised by the individual.

14-3	**Describe how an individual could control what PII about themselves is included in the system or how it is used. Also describe how those decisions could affect the individual.**
	In general, PUB collections require the individual to provide First and last names, email addresses, phone numbers, and physical addresses of organizations or individual's employer. In addition to the PII, forms on the website may ask for information about employer details (org size, org type, etc.), AmeriCorps alumni (on staff or individual status), local official names, or university details (size, type, dean or provost name). Individuals are not obligated to provide their information but may lose out on a service offered by AmeriCorps if they do not.

15- DATA RETENTION AND DESTRUCTION

15-1	**Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.**
	AmeriCorps is working to assign a retention schedule to these records. Until that occurs, all information collected through an AmeriCorps-hosted online form or GovDelivery will remain indefinitely.

16- SOCIAL SECURITY NUMBERS (SSNs)

16-1	**If the system collects truncated or full social security numbers (SSNs):**
	    a. **Explain why the SSNs are required.**
	    b. **Provide the legal authority for the usage of the SSNs.**
	    c. **Describe any plans to reduce the number of SSNs.**
	If the system does not collect any part of an SSN, write <u>Not Applicable</u>.

	Not Applicable; none of PUB's collections request or imply that an individual should provide their SSN.

17- WEBSITES	
17-1	**If the system includes a website which is available to individuals apart from AmeriCorps personnel and contractors, discuss how it meets all AmeriCorps and Federal privacy requirements. If the system does not include a website, write <u>Not Applicable</u>.**
	PUB uses Google Analytics and Facebook to acquire general information about individual's online activity (e.g., where an individual went within the AmeriCorps website), but none of the information collected could be used to identify an individual.

18- OTHER PRIVACY RISKS	
18-1	**Discuss any other system privacy risks or write <u>Not Applicable</u>.**
	Not applicable.