



AmeriCorps Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information technology (IT) system:	The Electronic-System for Programs, Agreements and National Service Participants
1-2	System Identifier (3 letter identifier):	ESP
1-3	Unique Investment Identifier (Exhibit 53):	485-000000004
1-4	Office or entity that owns the system:	Office of Information Technology
1-5	Office or entity that manages the system:	Office of Information Technology
1-6	State if the system is operational or provide the expected launch date:	Operational
1-7	System's security categorization:	Moderate
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	July 2022
1-9	Approximate number of individuals with personally identifiable information (PII) in the system:	eSPAN contains information on over 2 million individuals.

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

250 E Street SW

Washington, D.C. 20525

202-606-5000/ 800-942-267



4- PIA HISTORY	
4-1	<p>State whether this is the first PIA for the system or an update to a signed PIA.</p> <p>This is an update to an existing system with a prior signed PIA.</p>
4-2	<p>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>.</p> <p>The system was upgraded to Oracle19c since the last PIA was signed on June 2, 2016.</p>

5- SYSTEM PURPOSE	
5-1	<p>Describe the purpose of the system.</p> <p>The Electronic-System for Programs, Agreements and National Service Participants (eSPAN) application system is a set of modules built on the Oracle database management system developed and maintained by AmeriCorps. The primary purpose of eSPAN is to process, maintain, transit, manage and report on the information that AmeriCorps collects from its grantees and members, its institution users, and the general public to support its member functions (i.e., recruit, apply, serve, payment, award, cost share) and grant functions (i.e., apply, review, award, administer, reporting, evaluation, close out).</p> <p>eSPAN uses and stores information about the current and former AmeriCorps Service Members (Members), the public individuals who apply to become Members (Applicants) or peer reviewers (Peer Reviewer), the organizations that receive Members from AmeriCorps (Project Sponsors) and the associated Memorandum of Agreements, and the organizations that receive financial resources from AmeriCorps (Grantees) and the associated grants (Grants).</p> <p>Specifically, eSPAN is comprised of a centralized database and seven modules that interact with different section of the database designed to serve various member and grant management functions. These modules include Members Portal and eGrants Phase 2/Grantee Portal which are public-facing, AmeriCorps Staff Portal, eGrants Classic, eSPAN, Indicium, and the Data Warehouse which are used internally by AmeriCorps staff members.</p> <p>The Member Portal is a publicly available module where:</p> <ul style="list-style-type: none"> ○ Individuals of the public (Applicants) apply to serve and become members of an AmeriCorps program. ○ Members obtain their tax information, manage their Segal AmeriCorps Education Awards (Education Awards), and complete other functions related to their service



	<ul style="list-style-type: none"> ○ Personal and professional references (References) complete a form about Applicants ○ Staff working for institutions eligible to receive payment from a Member’s Education Award (Educational and Lending Institutions) input the information that AmeriCorps needs to pay their Institution. <ul style="list-style-type: none"> ● eGrants Phase 2/Grantee Portal is a publicly available module where: <ul style="list-style-type: none"> ○ Staff working for prospective and current Project Sponsors and Grantees (1) apply for Grants, and manage and provide status reports on their Grants and (2) apply for grants, recruit, manage, and provide status reports on their Members ○ Individuals review application forms from prospective Project Sponsors and Grantees (Peer Reviewer) and apply for positions ○ Peer Reviewers complete their employment profiles and submit their reviews ○ AmeriCorps employees and contractors (AmeriCorps staff) review application forms from prospective and current Project Sponsors and Grantees and help them troubleshoot the Portal. ● The AmeriCorps Staff Portal is an internal module where: <ul style="list-style-type: none"> ○ AmeriCorps staff view Applicant and Member information and manage their designated functions ○ AmeriCorps’ Office of the National Service Trust (Trust) staff manage and pay Education Awards. ● eGrants Classic is an internal module where AmeriCorps staff review and select applications from prospective Project Sponsors and Grantees, manage current Project Sponsors and Grantees, and select and manage Peer Reviewers. ● eSPAN module is an internal module where AmeriCorps staff complete a range of functions which cannot be completed in the other modules. For example, AmeriCorps staff use this module to process Members’ living allowance, calculate tax withholdings, and create tax documents. ● Indicium is an internal module where AmeriCorps staff store a broad range of documents about Applicants, Members, Project Sponsors, and Grantees that is not collected in the other modules. ● The Data Warehouse is an internal module that AmeriCorps staff use to analyze the data in eSPAN. It contains a copy of everything in the other modules and some additional non-PII information such as maps of congressional districts.
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6- INVENTORY OF PII	
6-1	Provide a list of all the PII included in the system.



	The list of PII in eSPAN include username, name, email addresses (personal and work), mailing addresses (e.g., home, work, permanent, temporary), phone numbers (personal and work), social security number (SSN), passport number, demographics (e.g., gender, race, ethnicity, marital status), birth date and birth location, bank account number, National Service Participation ID number (NSPID), license plate number, driver’s license number, insurance policy number, employer, and job title.
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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.
	<p>eSPAN currently maintains PII about individuals of the following groups:</p> <ul style="list-style-type: none"> • Applicants and Members, currently around 1.2 million and that number may increase by approximately 80,000 individuals each year • Emergency contacts, one or more for each Member • References for each VISTA and NCCC Applicant, two for each Applicant • Death beneficiary for each VISTA and NCCC Member, one for each Member • Individuals who worked for a prospective, current, or former Project Sponsor or Grantee, approximately 20,000 in total • Current and former Peer Reviewers, approximately 8,000 in total • Individuals who applied to become a Peer Reviewer and were not selected, approximately 9,500 in total • Individuals who work for an Educational or Lending Institution, approximately 24,500 in total <p>Although eSPAN maintains PII about staff working for Grantees who requested or received a Senior Corps Grant, it does not maintain PII about individuals who served in Senior Corps.</p>

8- INFORMATION IN THE SYSTEM

8-1	For each category of individuals discussed above:
	<ul style="list-style-type: none"> • Describe the information (not just PII) collected about that category. • Give specific details about any PII that is collected. • Describe how the information is used.
	<p>eSPAN’s modules collect and use different sets of information for different functions.</p> <p>Member Portal Main Page https://my.americorps.gov</p>



Member Portal Profile Creation -

<https://my.americorps.gov/mp/recruit/registration.do>

Applicants and Members use the Member Portal to manage their own information and complete functions related to their service. NCCC and VISTA Applicants and Members generally submit more information into the Member Portal because AmeriCorps has a greater role in managing their services.

For these individuals who want to become a VISTA or NCCC Member, they first access the Member Portal to make application. They complete an application form that requests their name, email, phone number, current and permanent mailing address, SSN, gender, birth date and location, citizenship, highest level of education and school, military status of self and family, status of registration to vote, known languages and proficiency, skills, and status of ownership of driver's license. Each page of the application form includes an Office of Management and Budget (OMB) Control Number in the footer (3045-0054). A note under the gender question states that information is used to assure AmeriCorps provides opportunities to all groups, is only used for data analysis and is kept confidential. Those who complete the application form receive an email with a link to the page where they can create their Member Portal username and password.

Other individuals access the Member Portal after they become Member and intend to have account in the Member Portal. They are required to complete a form that requests their name, date of birth (DOB), SSN, and email address. If that information matches their record in eSPAN, the Portal creates their account and sends them an email with instructions on how to set their username and password.

Interested Applicants may use the Member Portal to search and apply for VISTA and NCCC opportunities. The VISTA and NCCC application forms are slightly different, but both collect from an Applicant a motivational statement, the information about the Applicant's skills, community service experiences, race, ethnicity, and References (name, email, title, employer, address, and phone number), the Applicant's educational history and employment history (organization, location, dates, supervisor's name and contact information, title, duties, and reason for leaving, and a reason for employment or educational gaps longer than six months), the Applicant's current certifications and their expiration dates, and any information about adult or juvenile criminal offenses excluding speeding or parking tickets (date, place, charge, actions, court/probation/parole officer, and phone number) that the Applicant might have committed. All the pages of the application form (AmeriCorps Member Application, Enrollment, and Exit Form) include an OMB Control Number in the footer (3045-0054). Additional notices about the information being requested are also specifically provided in three pages of these forms:

- The page with questions about the Applicant's criminal history explains why AmeriCorps conducts a criminal background check.



- The page with questions about the Applicant's race and other demographic information explains that the information is only used for data analysis to assure AmeriCorps provides opportunities to all groups and would be kept confidential.
- The page with questions about the Applicant's References explains that the References will be contacted via email.

When an application form is submitted, the following functions may occur:

- The Member Portal automatically emails the References a link to the reference form in the Member Portal. It instructs each Reference to confirm their information and their relationship to the Applicant, and provide information about the Applicant's work performance and emotional maturity and their recommendation if the Applicant shall serve with AmeriCorps. Each Reference selects whether the Applicant may see their responses. The Reference is not provided a username, so the information must be provided in one online session.
- The Member Portal automatically sends the Applicant's name and SSN to the Social Security Administration (SSA) to confirm that the Applicant meets the citizenship requirement. This process is further explained in the associated [Computer Matching Agreement \(CMA\) between AmeriCorps and SSA](#). If the automatic process is unsuccessful, AmeriCorps may instruct the Applicant to provide their social security card or other documents to verify their citizenship.
- AmeriCorps staff may, depending on the program, manually check if the Applicant is listed on the [Department of Justice Dru Sjodin National Sex Offender Public Website](#). AmeriCorps staff use eSPAN to record only the information of whether the Applicant has a criminal sex offense record or not.
- AmeriCorps staff may, depending on the program, manually check if the Applicant has a criminal record in an FBI database. If so, AmeriCorps staff evaluate the gravity of the criminal offense. If AmeriCorps decides the Applicant is still eligible to serve, an AmeriCorps staff member documents the justification in a form which is stored in eSPAN, which is not provided to the Applicant.

Members may complete additional functions in the Member Portal depending on their status and branch of service (NCCC, VISTA, and State & National (S&N)), including

- (1) . These Thcompleting a form if the Member drives a vehicle that is involved in an automobile accident, with information about the vehicle insurance carrier and coverage, vehicle information and license plate number, and the purpose of travel.



- (2) submitting travel request forms which may request Member's emergency contact's name and phone number, information of Member's special needs (e.g., vegetarian, smoker, translations), and the purpose of travel.
- (3) completing the VISTA Future Plans Form with a description of Member's duties and accomplishments, and the rating of work by the Member's supervisor.
- (4) completing an exit form with information about the Member's disabilities status, special needs, etc.
- (5) completing a comprehensive Member Exit Survey just before or after the Member's service exit to answer survey questions about the Member's service experience and its benefit to the growth of the Member, and the Member's future plan. The contents of the answers might be shared with a very limited number of AmeriCorps staff and vendors to research and evaluate the AmeriCorps programs.

Staff working for the Educational and Lending Institutions also use the Member Portal. After they provide their name and business contact information and AmeriCorps verifies that they do work for the Institution, the staff member can login to provide the information their Institutions needs to receive an Education Award and see what Education Awards have been sent to their Institution.

[eGrants Phase 2/Grantee Portal](#)

For these prospective Project Sponsors and Grantees that want to become Project Sponsor and/or Grantee (see <https://www.nationalservice.gov/build-your-capacity> on how to become a Project Sponsor and/or Grantee) and the current Project Sponsors and Grantees, their Staff need to obtain eGrants Phase 2/Grantee Portal accounts to request and manage their AmeriCorps application. To register, the staff must first of all provide an email, a phone number, an username and password, and their organization's contact information and agree to the [eGrants Rules of Behavior](#) which states that they will securely handle and appropriately use the information in eGrants Phase 2/Grantee Portal.

To become Project Sponsor and/or Grantee, the staff account holders submit [SF-424 Family](#) application form to the portal on behalf of their organization. The PII collected in the portal is limited to the staff contact information and the resumes for the project/grant. Once an application to become a Project Sponsor and/or Grantee is selected or declined, AmeriCorps would notify the applicants. The application form which includes the names of some staff of the applicant would become public. AmeriCorps announces decision on each application through a Notice of Federal Funding Opportunity. The notice includes a section entitled *Transparency in Grantmaking* which explains what information becomes public after the competition ends.



Staff working for Project Sponsors and Grantees use the eGrants Phase 2/Grantee Portal to manage and submit reports, receive messages from AmeriCorps staff, and request modifications to their agreement with AmeriCorps. Some staff working for each Projects Sponsor also use the portal, to create service listings for their organization which generally include a staff member's name and contact information, to search and view a limited profile of Applicants who have not applied to their program and send an invitation to apply (Applicants use the Member Portal to select whether Project Sponsors may view their limited profile) to the Applicants, to view application forms and decide which Applicants should receive a slot, and to transfer Members between programs and assign job descriptions.

Project Sponsors also use the Portal to view, create, and update the profile of Member. S&N Members apply directly to the organization where they want to serve through the organization's own hiring process. If selected, the Member or the Project Sponsor add to the profile of the Member the same PII that eSPAN would collect from a VISTA or NCCC Applicant.

The VISTA Member screens are somewhat different from the S&N screens because AmeriCorps' role in Member management is different. For example, only Project Sponsors requesting a VISTA Member must complete an evaluation of the Members they want to hire. The evaluation covers the Member's strengths and weaknesses, the type of supervision the Member needs, and a rating of the Member's potential success as a VISTA Member.

Other individuals access and apply through eGrants Phase 2/Grantee Portal to become a Peer Reviewer. The application form requests their name, address, email address, phone number, DOB, optional ethnicity and race information, need for special accommodations, education and job history, and a record of publications.

Individuals selected to become Peer Reviewers use eGrants Phase 2/Grantee Portal to access and work on the Project Sponsor and Grantee application forms assigned to them for evaluation, and to provide their bank account information and SSNs to receive payment for the work assignment.

AmeriCorps Staff Portal:

The AmeriCorps Staff Portal is an AmeriCorps staff-only module that centers around Member management and processing Education Awards. For example, depending on their level of access, AmeriCorps staff may be able to:

- View and modify the information that Applicants and Members entered through the public-facing Portals and elsewhere
- Upload documents about Applicants and Members (e.g., oath of office, emergency contacts, drivers' license, citizenship confirmation, criminal history checks, leave requests, disciplinary issues, and health assessments)



- Review application forms and select who should become VISTA and NCCC Members
- Manage requests from Members to receive and spend their Education Awards, resolve payment concerns, pay for travel and training, and transfer to a different project
- Send messages to Project Sponsors, Grantees, and Members (they cannot respond through eSPAN module) and
- Create a broad range of reports about the Applicants and Members (e.g., which Members lists what skills, demographics, and disabilities in order to determine if AmeriCorps's outreach activities are successful).

eGrants Classic:

eGrants Classic is an AmeriCorps staff-only module that centers around selecting and managing Project Sponsors, Grantees, and Peer Reviewers. For example, depending on their level of access, AmeriCorps staff may be able to:

- Create and manage user accounts for all eSPAN modules
- View application forms from Project Sponsors and Grantees
- Select and manage Project Sponsors and Grantees
- Review application forms from Peer Reviewers, assign them to a panel, and receive their comments
- Access and modify the information needed to pay the Peer Reviewers
- View and document whether using a prospective or current Project Sponsor or Grantee raises any major concerns (e.g., ongoing Office of Inspector General audit) and the remediation strategy. This information does not generally include PII unless someone lost the right to contract with the Federal government.

eSPAN

eSPAN is an AmeriCorps staff-only module used for a range of functions not built into the other modules. For example, depending on their level of access, AmeriCorps staff may be able to:

- View all information found in the modules listed above
- Fix data discrepancies and override limits in the other modules
- Complete most functions related to the Education Awards (e.g., list who received an Education Award or has an Education Award about to expire, record what Educational and Lending Institution should receive what funds, approve extension requests, track the amount of each Education Award)
- Create a broad range of reports.

Indicium

AmeriCorps staff use this module to capture a broad range of files needed to manage Applicants, Members, Project Sponsors, and Grantees. For example:



	<ul style="list-style-type: none"> • When an Applicant’s citizenship is not automatically confirmed through the CMA with SSA, AmeriCorps staff use this module to store copies of the documents needed to verify citizenship (e.g., SSN card, birth certificate, passport, legal permanent resident card). • The Trust uses this module to capture the documents needed to justify paying an Education Award (e.g., proof that the Member attended the school, the cost of attendance, where the payment should be sent). • The information written on paper forms used years ago when Member was in service would be uploaded into this module <p>The Data Warehouse</p> <p>This database contains a duplicate of the information in eSPAN and some publicly available information like congressional and school districts. AmeriCorps staff use it for a broad range of data analysis activities like budget forecasting and determining the effectiveness of a program.</p>
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9- COLLECTIONS OF PII INTO THE SYSTEM	
9-1	<p>Describe for each source of PII in the system:</p> <ul style="list-style-type: none"> • The source. • What PII comes from that source. • How the PII enters the system. <p>The sources of the PII in eSPAN includes Individuals, Members, Applicants, Project Sponsors, Grantees, Peer Reviewers, staffs of both AmeriCorps and the Project Sponsors/Grantees, References and the third parties.</p> <p>The name, email, phone number, current and permanent mailing address, SSN, gender, birth date and location, citizenship, driver’s license information, vehicle information, criminal history, performance rating and other personal information of the Individual, Applicant and Member necessary for AmeriCorps to use to evaluate applications in line with all compliance requirements and make payment for Member and Peer Review service are collected directly from these individuals through eSPAN public web page. The name and business contact information of the staff are collected directly from these staff members which is necessary for account registration and management. The name and contact information of the references and emergency contact are collected directly from the Members or Individuals via eSPAN for reference checking or emergency contact purpose. The name, address, email address, phone number, DOB, voluntary ethnicity and race information, and special accommodation information of the Peer Reviewer are collected directly from the Peer Reviewer candidates via eSPAN which are essential for AmeriCorps to use to evaluate their candidacy. The reference comment on the Applicants is collected from the Reference as a 3rd party. AmeriCorps staff also manually check if the Applicant is listed on the 3rd party</p>



	<p>website - Department of Justice Dru Sjodin National Sex Offender Public Website or has a criminal record in a third-party database - FBI database, then document the results in eSPAN system. The information collected from the third-party sources are used to evaluate the overall suitability for the AmeriCorps' service positions.</p>
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<p>9-2</p>	<p>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>.</p>
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	<p>The eSPAN webpages available to the public include a link in the footer labeled <i>Privacy</i> which direct the user to AmeriCorps privacy webpages where they are informed of AmeriCorps's privacy policy and AmeriCorps' privacy program, the AmeriCorps System of Records Notices including SORN CNCS-04-CPO-MMF-Member Management Files (MMF) that covers eSPAN system, the AmeriCorps eSPAN PIA which provides sufficient details of the collection, use, maintain, disclosures and disposal of PII in eSPAN, and the information about how the PII and data privacy rights of the individuals are protected. AmeriCorps signed CMA with SSA to ensure all the exchanges of data including PII with SSA strictly follow established protocol and are in compliance with all the applicable regulations and laws.</p> <p>The eSPAN webpages available to the public also include a link in the footer labeled <i>Contact Us</i> which direct the user to the National Service Hotline (NSH) Contact Us Page. It instructs the individuals how to request information about any aspect of eSPAN via phone, live chat, or a messaging service.</p> <p>The eSPAN webpages that collect PII from the individual generally (1) indicate that the collection is voluntary, (2) explain the general purpose of the collection, (2) state what PII should be provided, (4) generally provides a separate text box for each item of PII, and (5) transmit the PII via a secure internet connection.</p> <p>The eSPAN webpages that collect PII from Applicants and Members cannot be accessed unless the individual confirms and acknowledges the Privacy Act Statement first. When the demographic information is requested, a notice would pop up which explains the reason for the collection and assures the information would remain confidential and be used solely for data analysis. When eSPAN instructs Applicants to provide information about their criminal history, a notice would pop up to explain that AmeriCorps will complete a criminal background check, the opportunities of the Applicants may be limited if they have a criminal record, and not providing their criminal history may impact whether they are selected to serve. Members who complete the Member Exit Survey are informed that their responses will remain private to the extent permitted by law. The eSPAN webpage that collects responses from References displays a Privacy Act Statement. References are provided the option to decide if they want the Applicant to see their responses or not. The eSPAN webpage that requests Peer Reviewers to provide their ethnicity or race information also explains that their responses are not</p>
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	<p>mandatory. The Notice of Federal Funding Opportunity that AmeriCorps publishes has a section titled Transparency in Grantmaking which explains what PII from each application form will be made public after the competition ends.</p> <p>AmeriCorps also put in place a series of administrative, technical and physical measures to safeguard eSPAN and the PII, more information in this regard is provided in the following sections.</p>
<p>9-3</p>	<p>If PII about an individual comes from a source other than the individual, describe:</p> <ol style="list-style-type: none"> 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. <p>If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.</p> <hr/> <p>Most of the PII in eSPAN is collected directly from the individuals, but there are situations where eSPAN reasonably collects PII from another party. AmeriCorps notifies the individuals when these collections could negatively affect them. For example:</p> <ul style="list-style-type: none"> • eSPAN collects PII from third parties to confirm that Applicants do not have a criminal or sex offender record that renders them ineligible to serve. This is reasonable because Applicants (1) may not fully disclose something that could compromise their application and (2) are informed this will be collected into eSPAN and used to assess their application. • eSPAN collects References' assessment of Applicants and Project Sponsors' assessment of their Members. This is reasonable because (1) AmeriCorps is seeking a third-party perspective and (2) Applicants and Members are informed that this PII will be collected into eSPAN and used to assess their application form or performance. • eSPAN requests that Members provide emergency contact information and does not confirm that PII with the emergency contact. This is reasonable because it is about someone who should be close to the Member, the PII is limited to contact information, and the Member may correct the information at any time via eSPAN. • When Project Sponsors enter PII on behalf of their Members, the Members have access to update that PII as needed.
<p>9-4</p>	<p>If any collections of PII 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>.</p> <hr/> <p>The front page of the Members Portal and eGrants Phase 2/Grantee Portal display OMB Control Number 3045-0187 and the expiry date.</p>



	<p>Several forms in eSPAN displays an OMB Control Number, but are not required to show an expiration date:</p> <ul style="list-style-type: none"> • The Member Application, Enrollment and Exit Form with OMB Control Number 3045-0054 • The Member Exit Survey with OMB Control Number 3045-0094 <p>The Project Sponsor and/or Grantee application form in the eGrants Phase 2/Grantee Portal does not display an OMB Control Number because that is included in the instructions document, the staff receives the form and instruction then enter information into the Portal accordingly.</p>
9-5	<p>If any collections of PII into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.</p> <p>Before eSPAN connects to other systems to receive PII about the public, AmeriCorps executes an agreement describing what PII will be received and how it will be protected. Currently there are agreements with:</p> <ul style="list-style-type: none"> • AmeriCorps’ financial management system (Momentum) to receive PII from eSPAN to process payments and send eSPAN a confirmation notice and • SSA so AmeriCorps can automatically send PII about Applicants to SSA and receive confirmation of their citizenship (see associated CMA).

10- SYSTEM ACCESS	
10-1	<p>Separately describe each category of individuals who can access the system along with:</p> <ul style="list-style-type: none"> • What PII they can access (all or what subset). • Why they need that level of access. • How they would request and receive that access. • How their access is reduced or eliminated when no longer necessary.
	<p>Approximately 350 AmeriCorps staff have authorized access to all the eSPAN modules, but their access to the specific screens and PII within those eSPAN modules depends on their role and authorized rights. A very limited number of users have authorized access to see full SSNs and even fewer users have authorized access to see personal information such as health information, disability information, or the Member Exit Survey results. To request eSPAN access, a supervisor or contract representative submits a request explaining the business needs for the user’s access, then the eSPAN administrator would select and grant an appropriate level of access. There are quarterly audits when those supervisors and contract representatives must confirm that the staff member still needs that level of access. When AmeriCorps staff separate from AmeriCorps, they lose all access to eSPAN.</p>



	<p>A staff member may set up an eGrants Phase 2/Grantee Portal account on behalf of their organization and apply to become a Project Sponsor or Grantee. If the application is approved by AmeriCorps, the staff becomes the account administrator for the Project Sponsor or Grantee organization and has administrator’s right to control who may access information about their organization or access PII about their Applicants/Members and what PII can be assessed, and remove an use’s access if the user separates from the organization.</p> <p>Anyone may use the eGrants Phase 2/Grantee Portal to apply to become a Peer Reviewer and input their payment information if selected. They may then access and update their PII retained in eSPAN. They may only access an application form from a potential Project Sponsor or Grantee if AmeriCorps staff assign them to review it.</p> <p>Applicants and Members who create an account in the Member Portal may later access the Member Portal and view some of the PII eSPAN retains on them. However, they cannot access the documents they provided containing PII.</p> <p>Staff working for Educational and Lending Institutions may create an account in the Member Portal and later access that account to view all the PII eSPAN retains on them.</p>
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11- PII SHARING	
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11-1	<p>Separately describe each entity that receives PII from the system and:</p> <ol style="list-style-type: none"> 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. <p>If PII is not shared outside the system, write <u>Not Applicable</u>.</p>
	<p>eSPAN shares PII with the following other systems:</p> <ul style="list-style-type: none"> • Momentum: eSPAN collects information about several activities that should result in payment (e.g., who was a NCCC Member during a particular pay period, who should be reimbursed for work-related travel) along with the banking information needed to provide the payment. eSPAN sends these PII to a second AmeriCorps system called Momentum which manages the payments and then sends eSPAN a confirmation notice. There is an Interconnection Service Agreement (ISA) and Memorandum of Understanding (MOU) in place between eSPAN and Momentum. • SSA: When an Applicant applies for service, a Member is transferred to a



new program, or a Member reenrolls in a different project, AmeriCorps needs to confirm that the Applicant/Member meets the citizenship requirement. To do that, eSPAN sends the Applicant/Member's SSN, name, and DOB to SSA and receives the citizenship information in return. This process is covered by a CMA, ISA, and MOU with SSA.

- **AmeriCorps Health Benefits System (AHB):** All VISTA and NCCC Members may enroll in a health benefits plan that reimburses some of their health care costs. AHB tracks and manages the PII needed to provide this benefit. Every workday, eSPAN sends AHB an encrypted file containing each VISTA and NCCC Member's name, DOB, gender, payment address, current address, permanent address, phone numbers, start and end date of service, member type and role, and NSPID. AHB uses these PII to confirm that the Member is eligible and establish initial contact. The vendor operating AHB has a contract with AmeriCorps which includes privacy and security provisions consistent with AmeriCorps' respective internal requirements.
- **U.S. Department of Treasury:** Once the Trust confirms that a former Member's request to spend their Education Award is accurate and meets all requirements, the payment information is sent from eSPAN to Treasury via a vendor's secure server; the file includes each Educational and Lending Institutions' contact information, amount to be paid, name of the Member, and their SSN. Similarly, once eSPAN compiles the monthly allowance for each VISTA and NCCC Member, the payment information is sent from eSPAN to Treasury via a vendor's secure server within the boundary of Momentum; the file includes the Member's name, NSPID, amount to be paid, address, and bank account information. The privacy and security provisions consistent with AmeriCorps' respective internal requirements are included in the contracts with vendors.
- **Mail Vendor:** eSPAN sends Education Award letters, Education Award extensions, tax documents, and other Member documents to a vendor who mails them to Members. The privacy and security provisions consistent with AmeriCorps' respective internal requirements are included in the contracts with vendors.

12- PRIVACY ACT REQUIREMENTS

12-1	<p>If the system creates one or more systems of records under the Privacy Act of 1974:</p> <ol style="list-style-type: none"> a. Describe the retrieval that creates each system of records. b. State which authorities authorize each system of records. c. State which system of records notices (SORN) applies to each system of records. <p>If the system does not create a system of records, write <u>Not Applicable</u>.</p>
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	<p>eSPAN operates under the following legal authorities:</p> <ul style="list-style-type: none"> • Domestic Volunteer Service Act, as amended 2009 • National and Community Service Act, as amended 2009 • Serve America Act (Pub. L. No.111-13) • National and Community Service Trust Act of 1993 • Budget and Accounting Procedures Act of 1950, as amended • Accounting Procedures Act of 1950, as amended • Chief Financial Officer Act of 1990 • Debt Collection Improvement Act of 1996 • Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988 <p>Information on Applicants and Members may be searched by NSPID, name, DOB, SSN, email address, phone numbers, and addresses.</p> <p>Applicants, Members, and References are provided the following Privacy Act Statement before eSPAN requests their PII.</p>
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13- SAFEGUARDS

13-1	<p>Describe the technical, physical, and administrative safeguards that protect the PII in the system.</p> <p>AmeriCorps’ administrative policies and procedures, technical controls, and physical controls help ensure the PII in eSPAN is safeguarded adequately and handled appropriately.</p> <p>To ensure eSPAN is appropriately managed, AmeriCorps developed several written procedures and processes, which include a process to approve and document all configuration changes, a breach response plan, and processes for user access managements per least privilege and need-to-know principles subject to regular auditing. All AmeriCorps employees with authorized access are required to receive annual security and privacy training and sign the AmeriCorps Cybersecurity Rules of Behavior with instructions about how to properly handle PII. All AmeriCorps contractors have security and privacy provisions in their contracts and each contractor employee are required to sign the AmeriCorps Cybersecurity Rules of Behavior.</p> <p>AmeriCorps developed and follows a privacy policy that governs all aspects of AmeriCorps’ privacy practices and PII handling processes, and a cybersecurity policy that governs all of AmeriCorps’ electronic information. The specific safeguard controls implemented include but are not limited to, that all access to eSPAN is encrypted using Transport Layer Security and removable media (e.g., tape backups) are encrypted using FIPS 140-2 compliance standards, all electronic media used to store PII in eSPAN is properly erased before it is decommissioned,</p>
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	<p>the PII about actual individuals is never used to test the system, and each year eSPAN undergoes a SA&A by an independent third party. eSPAN also creates a broad range of audit logs that capture the time, date, and username of everyone who changes one's system access, accesses eSPAN, or creates or modifies a record. Those audit logs are closely monitored, and unauthorized activity is referred to the appropriate official for action. Any PII captured in the audit logs is used solely for information security management purpose. Meanwhile, all the safeguards of the hosting environment of eSPAN also apply to eSPAN, with reinforced assurance.</p>
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14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
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14-1	<p>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.</p> <p>The steps taken to assure PII in eSPAN is sufficiently accurate, relevant, current, and complete are based on the needs of the function requiring that PII.</p> <p>AmeriCorps has different responsibilities when managing NCCC, VISTA, and S&N Applicants and Members, and designed eSPAN to only collect the PII necessary for those responsibilities. For example, eSPAN does not automatically collect banking details from S&N Members because AmeriCorps does not process their living allowance.</p> <p>eSPAN collects some PII directly from the individual through webpages. These webpages generally (1) request for each item of PII in a separate question, (2) provide a separate text box to receive each item of PII, and (3) warn or stop users if the response is in an unlikely format (e.g., flagging a blank textbox or a phone number that is less than ten digits). The NSH is available to help anyone with questions about how to correctly enter their PII.</p> <p>eSPAN is designed in a way that more sensitive decisions involving an individual would require additional levels of approval, which lowers the chance of a mistake. For example, removing a Member from service may require one user to document the removal in eSPAN and a second user to approve that removal.</p> <p>The accuracy and timeliness of PII in eSPAN primarily depends on whether individuals provide accurate information and update it as needed. The response to question 14-2 below discusses how individuals may provide and update most part of their PII.</p> <p>The IT security controls discussed above also help ensure that PII is protected from malicious or accidental changes.</p>
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14-2	<p>Describe how an individual could view, correct, update, or ask to amend their PII.</p>
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	<p>AmeriCorps works to inform all individuals how they may access PII about themselves if their PII are maintained within eSPAN:</p> <ul style="list-style-type: none"> • eSPAN and some of AmeriCorps’ other websites have notices about the NSH; the NHS can explain what PII about an individual may be in eSPAN, if/how they may navigate to it, and if/how they may update it. • The bottom of each form includes a link to AmeriCorps’ privacy webpage; that webpage lists a point of contact who will respond to privacy concerns raised by the individual. • The SORN CNCS-04-CPO-MMF-Member Management Files (MMF) (<u>Federal Register :: Privacy Act of 1974; System of Records</u>) provides notice to the public about the records maintained and processed in eSPAN. <p>Two of eSPAN’s modules give individuals the ability to access and update their own PII if the PII are maintained within eSPAN:</p> <ul style="list-style-type: none"> • Applicants and Members may access their PII via the Member Portal. • Staff working for Educational and Lending Institutions may access their PII via the Member Portal. • Staff working for Project Sponsors and Grantees may access their PII via the eGrants Phase 2/Grantee Portal. • Prospective and current Peer Reviewers may access their PII via the eGrants Phase 2/Grantee Portal. <p>There are some limitations such as:</p> <ul style="list-style-type: none"> • Individuals must contact AmeriCorps staff to request paper forms with their PII which were scanned and saved in Indicium (this module is not connected to the Member Portal) • Individuals who apply to AmeriCorps for any reason may not be able to change their PII after the application deadline and • Members with criminal records are not given access to the form that AmeriCorps staff completed with justification of the Members’ eligibility.
14-3	<p>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.</p> <p>eSPAN has the feature that enables the users to control what PII about themselves should be included in eSPAN or how it is used, depends on the purpose for collection. When eSPAN requests PII from the individuals, they can usually decline to provide it, but that choice may affect their ability to receive payment, become a Member, or enjoy another benefit.</p> <p>There are some situations where individuals are given some control over how their PII is used or accessed, Applicants decide if they want Project Sponsors to access part of their application form before they apply to that service listing.</p>



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.

The current record retention and disposition schedule numbers for records of National Service Trust are:

- DAA-0362-2018-0003-0001. The final deposition is temporary. The time of cutoff is at the end of fiscal year the voucher was processed. The records will be destroyed 12 years after cutoff.
- DAA-0362-2018-0003-0002. The final deposition is temporary. The time of cutoff is at the end of fiscal year the form was processed. The records will be destroyed 12 years after cutoff.
- DAA-0362-2018-0003-0003. The final deposition is temporary. The time of cutoff is at the end of fiscal year the form was adjudicated. The records will be destroyed 12 years after cutoff.
- DAA-0362-2018-0003-0004. The final deposition is temporary. The time of cutoff is at the end of fiscal year the form was received. The records will be destroyed four years after cutoff.
- DAA-0362-2018-0003-0005. The final deposition is temporary. The time of cutoff is at the end of fiscal year the extension request was adjudicated. The records will be destroyed four years after cutoff.
- DAA-0362-2018-0003-0006. The final deposition is temporary. The time of cutoff is at the end of fiscal year the award was transferred. The records will be destroyed four years after cutoff.
- DAA-0362-2018-0003-0007. The final deposition is temporary. The time of cutoff is at the end of fiscal year from the date the member earns their education award. The records will be destroyed four years after cutoff.
- DAA-0362-2018-0003-0008. The final deposition is temporary. The time of cutoff is at the end of fiscal year from the date the reissue is processed. The records will be destroyed four years after cutoff.

Due to the business needs, AmeriCorps is working to assign retention schedules to other records in eSPAN system. Currently, most records in eSPAN system are maintained for an indefinite period of time.

16- SOCIAL SECURITY NUMBERS (SSNs)

16-1 If the system collects truncated or full social security numbers (SSNs):

- Explain why the SSNs are required.**
- Provide the legal authority for the usage of the SSNs.**
- Describe any plans to reduce the number of SSNs.**

If the system does not collect any part of an SSN, write Not Applicable.



	<p>SSNs are collected only when it is legally required from</p> <ul style="list-style-type: none"> • Applicants to confirm their citizenship since that is an AmeriCorps eligibility requirement • Members if they receive a payment that must be reported to the Internal Revenue Service and • Peer Reviewers to send a record of their payments to the Internal Revenue Service <p>Depending on the user’s authorized level of access, eSPAN displays either the full SSN, or only the first 5 digits, or none of it.</p> <p>Authorities for these functions include the National and Community Service Act of 1990 as amended (42 U.S.C. 12501 <i>et seq.</i>) and the Domestic Volunteer Service Act of 1973 as amended (42 U.S.C. 4950 <i>et seq.</i>)</p> <p>Members are provided the following Privacy Act Notice before the Member Portal requests their SSN:</p> <p>This page of the form requests your SSN to (a) confirm your citizenship status for eligibility purposes and/or (b) send you a payment that must also be reported to the Internal Revenue Service using your SSN. This request is voluntary, but not providing your SSN may affect your ability to become a Member and/or receive payments. It is requested pursuant to 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.</p> <p>AmeriCorps only collects and uses SSN for the purposes as identified above. To reduce the number of SSN, AmeriCorps creates alternative members ID to be used in daily operations.</p>
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17- WEBSITES	
17-1	<p>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>.</p> <p>The eSPAN modules accessed by the public are the Member Portal and eGrants Phase 2/Grantee Portal.</p> <p>Neither of those modules utilize persistent cookies or similar tracking mechanisms.</p> <p>The Member Portal has a link in the footer of every webpage labeled <i>Privacy</i> which sends the user to https://www.nationalservice.gov/privacy; that webpage includes AmeriCorps’ privacy policy and an email address where individuals can inquire</p>



about the privacy ramifications of eSPAN. The main page also includes the following statement:

This is a United States Government computer system. This computer system, including all related equipment, networks, software, and data, is provided only for authorized U.S. government use. Unauthorized use of this system is strictly prohibited and may be subject to criminal prosecution. AmeriCorps may monitor or audit any activity or communication on the system and retrieve any information stored within the system. By accessing and using this computer, you are consenting to such monitoring and information retrieval for law enforcement and other purposes. Unauthorized use or policy infractions should be reported to AmeriCorps.

The eGrants Phase 2/Grantee Portal has the link to <https://www.nationalservice.gov/privacy>. The main page also includes the statement:

AmeriCorps actively monitors this system and software activity to maintain system security, availability, and to ensure appropriate and legitimate usage. Any individual who intentionally accesses a Federal computer or system without authorization, and who alters, damages, makes unauthorized modifications to, or destroys information in any Federal interest computer, or exceeds authorized access, is in violation of the Computer Fraud and Abuse Act of 1986 (Public Law 99-474). Any evidence of possible violations of proper use or applicable laws found as a result of this monitoring may be turned over to Corporation Management and law enforcement. Any individual found to be in violation of the system proper use rules or law could be punished with loss of system access, fines and imprisonment. By proceeding, you hereby acknowledge your agreement with these terms and the system's rules of behavior and consent to such monitoring and informational retrieval for law enforcement and other official purposes.

Apart from links that go to other Federal agency websites, individuals who click a link from an AmeriCorps website to a non-Federal agency owned website would see the following notice:

The website you are about to visit is not part of the AmeriCorps domain and may or may not be under AmeriCorps' management or control, and 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 ([Read more](#)).

Click here or on the Continue button to proceed to the external website, otherwise click cancel to stay on NationalService.gov.

18- OTHER PRIVACY RISKS

18-1 Discuss any other system privacy risks or write **Not Applicable**.

Not applicable.