

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 operates 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:	Moderate
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	July 7, 2023
1-9	Approximate number of individuals with Personally Identifiable Information (PII) in the system:	AmeriCorps Public Websites (PUB) is comprised of the AmeriCorps.gov website and VISTA Campus website. The webforms hosted on the VISTA Campus website collect PII into the website backend database from approximately 35,000 individuals who have completed required trainings. This number might increase over time.


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Washington, D.C. 20525

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3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)			
	Role	*Signature*	*Date*
3-1	Information 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	<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>Additional privacy and data security controls are being implemented.</p>
4-3	<p>State whether this is the annual review of a PIA.</p> <p>A Annual Review</p>
4-3	<p>Describe any changes to the system, data activity, policies, procedures, any interrelating component and process, vendor, third parties, contracts and any required controls since last PIA.</p> <p>Since the last PIA, no change has been made to the AmeriCorps.gov website. However, there are changes to the VISTA Campus website as listed below:</p> <ol style="list-style-type: none"> 1. Removal of the Job Board feature and the related Employer user type; 2. Removal of the Stories of Service feature and the Journal feature along with all submitted user content in those areas; 3. Implementation of an automated process to block user accounts that have not been accessed or for which the password has not been changed for a specified period of time; 4. Implementation of a monthly review of user accounts (general and privileged), with changes made to user accounts that no longer need access; 5. Implementation of a privacy option for general user accounts that allows the user to exclude their account from search results; and 6. Addition of standard language that appears wherever a link appears for a non-federal website.

4-3 C	Describe objects and results of audit or tests (continuous monitoring).
	Not Applicable
4-3 D	Certify and state “Completion of Review” if no change occurs.
	Not Applicable
4-4	If the system is being retired, state whether a decommission plan is completed and attach a copy.
	Not Applicable

5- SYSTEM PURPOSE

5-1	Describe purpose of the system (or program, product, service)
	<p>AmeriCorps Public Websites (PUB) provide internet web hosting services for publicly available and largely static web content managed by AmeriCorps. It is comprised of AmeriCorps.gov, as well as the following VISTA Campus 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 the AmeriCorps VISTA program can learn and interact more with the program by creating an account on the site to access learning resources, discussion boards, and other interactive features.</p> <p>PUB promotes open data initiative, encourages individuals’ participation, and continuously improves public confidence in AmeriCorps program 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 Data.AmeriCorps.gov, are provided so that the visitors to AmeriCorps’ website can utilize the tool to easily manipulate and analyze data. There are also links to forms managed by AmeriCorps’ GovDelivery system that individuals can complete if they want to subscribe to an AmeriCorps listserv email or SMS/text messaging service.</p> <p>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 certified Cloud environment.</p>

6- INVENTORY OF PII

6-1	Provide a list of all the PII included in the system.
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	<p>AmeriCorps.gov collects the following information on web forms:</p> <ul style="list-style-type: none"> • Names; • Contact information (e.g., emails, phone numbers, physical addresses); • Photos; and • Employment information (e.g., job titles, roles). <p>VISTACampus.gov collects the following information on web forms:</p> <ul style="list-style-type: none"> • Organization name; • City, state, zip; • First and last name; • Email address; • Short bio statement (optional); • Photo (optional); • Role in program (member, leader, supervisor, etc.); and • Position title. <p>Social media handles and/or videos are not requested. AmeriCorps may follow up with an individual for photos in response to a Share Your Service Story submission at https://americorps.gov/newsroom/stories/share-your-service-story. The VISTA Campus account form allows users to upload a profile picture which is optional for account holders.</p>
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7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM	
7-1	<p>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</p> <p>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.</p> <p>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.</p>

	<p>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.</p> <p>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.</p> <p>In total, PUB’s database stores PII from approximately 35,000 individuals who completed one of the AmeriCorps-hosted online forms or had a form completed about them.</p>
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8- INFORMATION IN THE SYSTEM	
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8-1 A	<p>For each category of individuals discussed above:</p> <p>Describe the information (not just PII) collected about that category and how the information is used.</p>
	<p>The current AmeriCorps-hosted online forms on the PUB website are as follows:</p> <ul style="list-style-type: none"> • 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 that has an accessibility issue, and feedback of concerns. This information goes to AmeriCorps’ Section 508 team 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. The contact information collected includes the full name, email address, phone number, fax number, and e-signature of a contact representative from the interested institution. The form may also collect the full name, email address, phone number, fax number, and e-signature of the institution’s president, provost, or dean (if different from the contact representative). 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@americorps.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), organizational 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@americorps.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 other similar service organizations. It collects the business information of the employer, the employer's programmatic coordinator's name, title, email and phone number, and information about the organization's hiring practices and its interest of participating in the program initiative. This information is sent to AmeriCorps' web team which will connect with the submitter and discuss their application before posting the information on AmeriCorps' website. 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 events on National Service Recognition Day. Some of these organizations are grantees while others have no connection to AmeriCorps apart from promoting National Service Recognition Day. This form collects information about the volunteer event 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 attend the event. AmeriCorps uses this information internally to understand what events occur to celebrate National Service Recognition Day and evaluate the success of the celebration.

- [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 in attendance. The information goes to the Office of Government Relations and Strategic Engagement and the Senior Advisor for Partnership and Outreach of AmeriCorps, via events@americorps.gov, where it is used to help AmeriCorps collaborate with the organizations that run the events. In addition to being sent to events@americorps.gov, submissions are downloaded to SharePoint regularly and then cleared from Drupal.
- [AmeriCorps NCCC Questions|AmeriCorps](#): This online form collects questions from the public about the AmeriCorps NCCC program. The information collected includes the email addresses of individual who make submissions. Their collected information is sent to AmeriCorps' NCCC inboxes: NCCCMedia@americorps.gov and ANCCC@americorps.gov.
- [Harris Wofford Joint Service Award](#): This online form collects information from AmeriCorps and Peace Corps alumni who are applying for the award. The form collects their name, email, phone number, story, and programs they served in. The information is sent to engagement@americorps.gov.
- [Join NCCC -Connect with US Form](#): This online application form collects name and email address of the applicants and other program related information.
- [VISTA Campus Accounts \(americorps.gov\)](#): This online account form collects name, email address, organization name, city, state, zip, profile statement that the user can input.



	<p>The AmeriCorps website had several AmeriCorps-hosted online forms that are no longer open to the public, but AmeriCorps continues to retain the information within the Drupal database for reference, including:</p> <ul style="list-style-type: none">• The MLK Day of Service Project Report – This form collected information about past MLK Day events, including the names of any senior administrators or elected officials who attended the event.• The Recognition Day Event Tracker – This form collected information about past National Service Recognition Day events, including the names of any senior administrators or elected officials who attended the event.• The Day of Service Event Report – This 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 event.• The AmeriCorps Search Tool Feedback – This form 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 form collected information from AmeriCorps VISTA program alumni who want to promote the program. It collected their name, address, dates and location of service, shirt size, and information about at least one planned outreach event. <p>PUB contains 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.</p> <p>PUB also incorporates several embedded forms and links to forms hosted by GovDelivery:</p>
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	<ul style="list-style-type: none"> • Most forms collect a phone number or email address from individuals who want to subscribe to one of AmeriCorps’ listservs 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 the 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 service with the program. AmeriCorps NCCC uses this information to connect with these individuals directly through GovDelivery. This user data is never moved outside of the GovDelivery system. <p>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).</p>
<p>8-1 B</p>	<p>State whether the system derives new data, or creates previously unavailable data, about an individual via aggregation of information or other means. Explain why, how it is related to the purpose of the system, how it is used, and with whom it is shared.</p>
	<p>Not Applicable</p>
<p>8-1 C</p>	<p>If the system uses commercial or publicly available data, explain why, how it is related to the purpose of the system, and how it is used.</p>
	<p>Not Applicable</p>
<p>8-1 D</p>	<p>Describe any application of PII redaction, mask, anonymization, or elimination.</p>
	<p>Not Applicable</p>
<p>Describe any design that is used to enhance privacy protection.</p>	



<p>8-1 E</p>	<p>The VISTA Campus website VISTA Campus Accounts (americorps.gov) includes a privacy setting that allows the user to select to exclude their profile from search results when they set up their profile.</p>
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9- COLLECTIONS OF PII INTO THE SYSTEM

<p>9-1</p>	<p>Describe for each source of PII in the system:</p> <ul style="list-style-type: none"> a. The source. b. What comes from that source. c. How the PII enters the system. <p>All the PII collected by PUB comes from members of AmeriCorps programs or public individuals who are interested in the programs of AmeriCorps.</p> <p>For the AmeriCorps.gov, connect.americorps.gov, and learn.americorps.gov websites, the PII is collected by an account creation form that the user completes by entering information into specific fields, following prompts on the page.</p>
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9-2

<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> <p>The Share Your Service Story and Employers of National Service online forms include a notice that explains where information may be shared. The submitter must read and acknowledge that before submitting the form.</p> <p>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:</p> <p><i>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.</i></p> <p><i>Click on the continue button to proceed to the external website; otherwise click cancel to stay on AmeriCorps.gov.</i></p> <p>The AmeriCorps NCCC Connect with Us form includes the following privacy notice:</p>
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	<p><i>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:</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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).</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>For web pages with links to YouTube videos, a notice beneath each embedded YouTube video says: <i>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.</i></p> <p>The VISTA Campus user profile includes a privacy setting that allows the user to exclude their profile from search results.</p>
9-3	<p>If PII about an individual comes from a secondary 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>
	<p>A few AmeriCorps-hosted online forms are intended for an organization’s representative and ask for certain contact information of employees beyond the</p>

	<p>representative completing the form. The Employers of National Service, Schools of National Service, and National Service Recognition Day 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 attend an event. AmeriCorps will not post any information collected through these forms until they contact the submitter to confirm that the information is correct.</p> <p>The website does not currently have any collections that ask for names of individuals who should be thanked or recognized for their service.</p>
9-4	<p>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 and effective date. If the system does not implicate the PRA, write <u>Not Applicable</u>.</p> <ul style="list-style-type: none"> • The Schools of National Service Commitment Form displays OMB Control Number 3045-0143. • The Share Your Service Story form • 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 . • Event Submission form displays OMB Control Number 3045-0122.
9-5	<p>If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.</p> <p>The Memorandum of Understanding between AmeriCorps and Acquia, Inc. The purpose of this memorandum is to establish a management agreement between AmeriCorps, and Acquia, Inc.</p> <p>The Interconnecting Security Agreement between AmeriCorps and Acquia, Inc. The purpose of this ISA is to establish a security agreement between AmeriCorps, and Acquia, Inc.</p>

10- SYSTEM ACCESS

10-1	<p>Separately describe each category of individuals who can access the system along with:</p> <p style="padding-left: 20px;">a. What PII they can access (all or what subset).</p>
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	<p>b. Why they need that level of access.</p> <p>c. How they would request and receive that access.</p> <p>d. How their access is reduced or eliminated when no longer necessary.</p> <p>e. Identify policies and procedure outlining roles and responsibilities and auditing processes.</p>
	<p>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.</p> <p>AmeriCorps staff who manage AmeriCorps' public website have authorized access to PUB database, but their access depends on their role and authorized rights.</p> <p>All PII collected from subscribers to an AmeriCorps listserv goes to a GovDelivery account managed by AmeriCorps. The PUB database that maintains a copy of the information collected through the online forms is in the Acquia Cloud Environment (ACE). The ACE is FedRAMP 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 the same security requirements for data protection as GovDelivery. Access is limited to only those employees who are trained to access the system.</p> <p>VISTA Campus users can search for other users on the site and can view select information from their user profile, such as name, organization, city, state, zip, and personal statement. Users can also see posts and comments that other users post on connect.americorps.gov.</p> <p>Six AmeriCorps staff members in the VISTA Training Unit can view VISTA Campus user profiles, along with site usage data (date of last log-in, course completion, etc.). Six contractor staff members can access all user data.</p>

11- PII SHARING	
11-1	<p>Separately describe each entity that receives PII from the system and:</p> <p>a. What PII is shared.</p> <p>b. Why PII is shared (<i>specify the purpose</i>)</p> <p>c. How the PII is shared (what means/medium).</p> <p>d. The privacy controls to protect the PII while in transit.</p> <p>e. The privacy controls to protect the PII once received.</p>



	<p>f. PII sharing agreements (<i>describe if the agreement specifies the scope of the information sharing, the parties to the agreement, and the duration of the agreement</i>)</p> <p>g. Describe security and privacy clauses and audit clauses in the agreement or vendor (including third party vendors) contract.</p> <p>If PII is not shared outside the system, write <u>Not Applicable</u>.</p>
	<p>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.</p> <p>All content and associated information submitted by 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 the GovDelivery digital communication service contract between the vendor and AmeriCorps that is executed in full compliance with the Privacy Act of 1974. The vendor is prohibited from sharing any information belonging to AmeriCorps with third parties. For more information, please review AmeriCorps’ GovDelivery PIA published on AmeriCorps website (https://www.americorps.gov/about/agency-overview/privacy-policy).</p> <p>All PII is collected directly from individuals at the time of registration on all forms in the FedRAMP Drupal Database.</p>

12- PRIVACY ACT REQUIREMENTS

12-1	<p>If the system creates one or more systems of records under the Privacy Act of 1974:</p> <ul 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 (SORNs) apply to each system of records. <p>If the system does not create a system of records, write <u>Not Applicable</u>.</p>
	<p>VISTA Campus form: Applicants names in combination with other information provided can be retrieved. These are covered by SORN coverage listed below:</p> <p>CNCS-04-CPO-MMF-Member Management Files (MMF).</p> <p>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.</p>

13- SAFEGUARDS**13-1 Describe the data processing environments and the technical, physical, and administrative safeguards (including vendors') that protect the PII in the system.**

AmeriCorps has implemented a series of administrative, technical, and physical controls to safeguard PUB and the information it maintains.

Specifically, in order to maintain adequate security and privacy compliance, 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 is an MOU and an 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 are 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 forms to store email subscriber information. GovDelivery is both ISO27001 certified and FedRAMP approved. GovDelivery's 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

	<p>contract with AmeriCorps, which is fully executed in accordance with the Privacy Act of 1974.</p> <p>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.</p>
13-2	<p>Describe the technical, physical, and administrative measures that protect PII if the system is being retired.</p> <p>Not Applicable</p>
13-3	<p>State if a system security plan and privacy plan is completed and the date of control verification.</p> <p>PUB SSP last updated July 11, 2023. Currently on revision 1.7</p>

14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL

14-1	<p>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete, as well as the assurance procedure.</p> <p>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 information is accurate.</p>
14-2	<p>Describe how an individual could view, correct, update, or ask to amend their PII.</p> <p>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.</p> <p>VISTA Campus users can view and edit their user account and profile at any time by logging in to the site and navigating to their account page.</p> <p>All PUB collections of PII are either (a) on a webpage that provides a 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.</p>
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>In general, PUB collections require the individual to provide first and last names, email addresses, phone numbers, and physical addresses of organizations or employers. In addition to the PII, forms on the website may ask for information</p>

	<p>about employers (organization size, organization type, etc.), AmeriCorps alumni, 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.</p> <p>Individuals must limit their information to what is being requested and have the right to ask questions about requests for information.</p>
14-4	State if PII handling processes apply automation technology for decision making and describe the measures taken to eliminate risk to privacy interests.
	Not Applicable

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.
	PUB records are currently under review per Title 36, Chapter XII, Subchapter B of the Code of Federal Regulations, and product records are being appraised to determine their current value and applicable retention schedule assignment. In the interim, AmeriCorps' records will be maintained as retrievable and useable indefinitely until the record schedule is approved by NARA.
15-1	Identify the role and process to coordinate with the parties involved in record retention and disposition.
	The System Owner/Information System Owner will coordinate the record retention activities with the Records Retentions Officer.

16- SOCIAL SECURITY NUMBERS (SSNs)

16-1	If the system collects truncated or full social security numbers (SSNs): <ol style="list-style-type: none"> 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>.
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	<p>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.</p>
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18- OTHER PRIVACY RISKS	
18-1	<p>Discuss any other system privacy risks or write <u>Not Applicable</u>.</p> <p>Not Applicable</p>