



## AmeriCorps Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	<b>Name of the information system:</b>	American Climate Corps Website Portal
1-2	<b>System Identifier (3 letter identifier):</b>	ACC
1-3	<b>Unique Investment Identifier (Exhibit 53):</b>	Not Applicable
1-4	<b>Office or entity that owns the system:</b>	Strategic Partnership Office
1-5	<b>Office or entity that operates the system:</b>	Office Of Information Technology
1-6	<b>State if the system is operational or provide the expected launch date:</b>	Operational
1-7	<b>System's security categorization:</b>	Moderate
1-8	<b>Date of most recent Security Assessment and Authorization (SA&amp;A) or why one is not required:</b>	New system currently pursuing an Authority to Operate (ATO)
1-9	<b>Approximate number of individuals with Personally Identifiable Information (PII) in the system:</b>	Not Applicable



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

<b>4- PIA HISTORY</b>	
4-1	<b>State whether this is the first PIA for the system or an update to a signed PIA.</b> This is the first PIA for ACC.
4-2	<b>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>.</b> Not applicable
4-3	<b>State whether this is the annual review of PIA.</b>
A	This is not the annual review
4-3	<b>Describe any changes to the system, data activity, policies, procedures, any interrelating component and process, vendor, 3<sup>rd</sup> parties, contracts and any required controls since last PIA.</b>
B	This is the first PIA for ACC.
4-3	<b>Describe objects and results of audit or tests (continuous monitoring).</b>
C	This is the initial PIA generated for ACC.
4-3	<b>Certify and state "Completion of Review" if no change occurs.</b>
D	This is the system's first PIA.
4-4	<b>If the system is being retired, state whether a decommission plan is completed and attach a copy.</b>
	Not Applicable

<b>5- SYSTEM PURPOSE</b>	
5-1	<b>Describe Purpose of the System (or program, product, service)</b>



	<p>Spearheaded by the White House, the American Climate Corps (ACC) program is an interagency initiative with AmeriCorps serving as the central coordinating body to oversee and execute the efforts partnering with the National Oceanic and Atmospheric Administration, the Departments of Labor, the Department the Interior, the Department of Agriculture, and the Department of Energy. The ACC Portal is developed to promote the ACC program aiming at putting thousands of Americans to work on fighting the impacts of climate change while gaining the skills they need to join the growing clean energy and climate-resilience workforce.</p> <p>ACC partner agencies use ACC Portal to post featured program information and job listing where the interested job seekers can follow the links redirecting them to apply for a position on ACC partners’ websites and the public individuals can sign up for information about ACC activities and register their interest. A survey form is posted on ACC Portal which is used to collect the age range and zip-code of these individuals for reporting the ACC program outreach to the White House. It is expected that ACC Portal will have more features to enable learning management, event management, etc.</p> <p>18F, a digital service entity within the General Services Administration (GSA) develops ACC Portal (ACC.gov) on a web service platform hosted in AmeriCorps’ instance of Microsoft Azure Government Cloud. Iframe technology is used in ACC Portal to embed a sign-up form hosted by the GovDelivery System of AmeriCorps, where the public individual’s sign-up contact information is collected and stored.</p>
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## 6- INVENTORY OF PII

<b>6-1</b>	<p><b>Provide a list of all the PII included in the system.</b></p> <p>The ACC website pages are static, which are not connected to and interact with any database. The embedded GovDelivery sign-up form collects the following information: zip code, email address, and the first and last names.</p>
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## 7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM

<b>7-1</b>	<p><b>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</b></p> <p>ACC embeds form hosted in AmeriCorps’ GovDelivery system which is used by public individuals to enter their subscription contact information. The information is not directly collected and maintained by ACC.</p> <p>Currently, the ACC website has received a total of 275,415 visits, averaging around 5,632 visits per week. So far, 8,570 public individuals have submitted their contact information through the GovDelivery sign-up form.</p>
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## 8- INFORMATION IN THE SYSTEM

	<b>For each category of individuals discussed above:</b>
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8-1 A	<b>Describe the information (not just PII) collected about that category and how the information is used.</b>
	The information collected through the GovDelivery contact form is used to generate leads and compile an email list of individuals interested in the American Climate Corps (ACC). Collecting zip codes and age ranges helps track the progress of ACC program outreach and measure the website’s effectiveness in engaging individuals from diverse demographic backgrounds, including young people and those from Justice40 communities. However, this information will not be used to identify or track any individual.
8-1 B	<b>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.</b>
	Not Applicable
8-1 C	<b>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.</b>
	This system does not use commercial or publicly available data.
8-1 D	<b>Describe any application of PII redaction, mask, anonymization or elimination.</b>
	The information currently collected is limited and necessary for ACC program evaluation.
8-1 E	<b>Describe any design that is used to enhance privacy protection.</b>
	The ACC Portal is hosted in a secured cloud environment, so is the GovDelivery which is FedRAMP certified. They are conforming to FedRAMP and other government guidelines and standards, ensuring reliable and secure data handling and delivery.

**9- COLLECTIONS OF PII INTO THE SYSTEM**

9-1	<b>Describe for each source of PII in the system:</b> <ul style="list-style-type: none"> <li>a. The source.</li> <li>b. What comes from that source.</li> <li>c. How the PII enters the system.</li> </ul>
	The only source of personally identifiable information (PII) collected through the embedded GovDelivery contact form on the ACC website is the individuals who voluntarily fill out the form. The information provided includes their name, email address, and zip code.
9-2	<b>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>.</b>
	Via the contact form hosted on GovDelivery, the ACC program gathers personal information needed for program outreach to recruit members and volunteers and



	engaged with the public. A privacy notice with opt-in sign in option is presented to the public individuals before they proceed to provide their sign-up information. ACC.gov only collects and maintains personal information with the consent of the public individuals.
<b>9-3</b>	<b>If PII about an individual comes from a source other than the individual, describe:</b> <ul style="list-style-type: none"> <li>a. Why the PII is collected from the secondary source.</li> <li>b. Why the PII from the secondary source is sufficiently accurate.</li> <li>c. If/how the individual is aware that the secondary source will provide their PII.</li> </ul> <b>If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.</b>
	Not applicable
<b>9-4</b>	<b>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>.</b>
	OMB Control Number 3045-0137 <a href="#">Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery - OMB 30450137</a> . <b>Current Expiration Date</b> is 05/31/2026
<b>9-5</b>	<b>If any collections into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.</b>
	Not applicable

**10- SYSTEM ACCESS**

<b>10-1</b>	<b>Separately describe each category of individuals who can access the system along with:</b> <ul style="list-style-type: none"> <li>a. What PII they can access (all or what subset).</li> <li>b. Why they need that level of access.</li> <li>c. How they would request and receive that access.</li> <li>d. How their access is reduced or eliminated when no longer necessary.</li> <li>e. Identify policies and procedure outlining roles and responsibilities and auditing processes.</li> </ul>
	The ACC program partners staff the system administrator can access the system.  ACC Portal is a public facing static website that feature the programs of the ACC partners and relative position listings. There are three categories of individuals who can interact with ACC Portal. <ol style="list-style-type: none"> <li>1. Members of the public can view the sign-up form embedded on the ACC Portal and submit their contact information, which is then stored in AmeriCorps' GovDelivery system. Additionally, individuals have the option to email a designated point of contact listed on the ACC website for any questions or inquiries.</li> </ol>

	<p>2. Only specifically authorized ACC program staff can access and process the information collected through the embedded form. When information is submitted via the online form, it is sent to the email accounts of authorized ACC staff. The submitted information is also directed to ACC administrators and shared AmeriCorps email accounts.</p>
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### 11- PII SHARING

<b>11-1</b>	<p><b>Separately describe each entity that receives PII from the system and:</b></p> <ol style="list-style-type: none"> <li>a. <b>What PII is shared.</b></li> <li>b. <b>Why PII is shared</b> (<i>specify the purpose</i>)</li> <li>c. <b>How the PII is shared</b> (<i>what means/medium</i>).</li> <li>d. <b>The privacy controls to protect the PII while in transit.</b></li> <li>e. <b>The privacy controls to protect the PII once received.</b></li> <li>f. <b>PII sharing agreements</b> (<i>describe if the agreement specifies the scope of the information sharing, parties of agreement and the duration of the agreement</i>)</li> <li>g. <b>Describe security and privacy clauses and audit clauses in the agreement or vendor (including third party vendors) contract.</b></li> </ol> <p><b>If PII is not shared outside the system, write <u>Not Applicable</u>.</b></p>
	Not Applicable.

### 12- PRIVACY ACT REQUIREMENTS

<b>12-1</b>	<p><b>If the system creates one or more systems of records under the Privacy Act of 1974:</b></p> <ol style="list-style-type: none"> <li>a. <b>Describe the retrieval that creates each system of records.</b></li> <li>b. <b>State which authorities authorize each system of records.</b></li> <li>c. <b>State which SORNs apply to each system of records.</b></li> </ol> <p><b>If the system does not create a system of records, write <u>Not Applicable</u>.</b></p>
	<p>The embedded GovDelivery form on ACC website is used to collect information from public individuals who are interested in ACC program. The name and email address might be used to retrieved records from GovDelivery system. The CNCS–05–OEA–SNPE Social Network and Public Engagement System of Records Notice [88 FR 30728] covers the collection of specific PII into GovDelivery for AmeriCorps program outreach and promotion. For more information, please review GovDelivery PIA at <a href="http://www.AmeriCorps.gov/privacy">www.AmeriCorps.gov/privacy</a>.</p>

### 13- SAFEGUARDS

<b>13-1</b>	<p><b>Describe the data processing environments and the technical, physical, and administrative safeguards (including vendors’) that protect the PII in the system.</b></p>
	<p>GovDelivery is responsible for providing most of the technical, physical, and administrative safeguards to protect the PII within the AmeriCorps ACC account. Regarding administrative safeguards, ACC and AmeriCorps require that all</p>

	<p>employees and contractors complete several mandatory trainings upon hire and annually to maintain access to the ACC on the GovDelivery platform. The required trainings include the Acceptable Use Policy Training (which covers the handling of customer data), Security Awareness Training, Privacy Training, and Insider Threat Training. Additional trainings, such as Incident Response Training, Contingency Plan Training, and Role-based Training, may be required based on specific roles and responsibilities. Employees and contractors must also review and agree to the Rules of Behavior (ROB), Confidentiality, and Non-Disclosure agreements via signature.</p> <p>The ACC sign-up form, hosted by AmeriCorps on the GovDelivery system, collects and stores contact information from individuals interested in ACC programs. To ensure that the ACC website is appropriately developed, and that data privacy is well protected, a series of administrative, technical, and physical measures are implemented, commensurate with the identified risk level. These measures include mandatory FIPS-140-2 encryption to protect all GovDelivery data at rest and in transit. Access to GovDelivery data is restricted through role-based access controls and the principle of least privilege. Additionally, users can only gain access to the system after successfully passing two-factor authentication. ACC and AmeriCorps have implemented and adhere to all required access control requirements for the ACC system.</p> <p>Breach response and data spillage are integral components of AmeriCorps’s incident response plan and procedures. Data is backed up only through replication within AmeriCorps' security boundary, and removable media is not permitted within data centers. If removable media is used, ACC administrators must follow proper protections for its management and disposal in accordance with AmeriCorps Information Classification and Handling Standards. Log data is protected during management and is properly destroyed after use, per media protection requirements. PII subject to disposition is appropriately destroyed following the Information Classification and Handling Standards associated with GovDelivery.</p>
<b>13-2</b>	<b>Describe the technical, physical, and administrative measures that protect PII if the system is being retired.</b> Not Applicable
<b>13-3</b>	<b>State if a system security plan and privacy plan is completed and the date of control verification.</b> The development of a system security and privacy plan are completed and verified July 24, 2024.
<b>14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL</b>	
<b>14-1</b>	<b>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete and the assurance procedure.</b> A Public individuals provide their sign-up information voluntarily via standard contact form embedded on ACC website for the purpose of receiving more ACC program information. The sign-up information is stored in AmeriCorps

	GovDelivery system. The information collected is limited to what is necessary and relevant. The individual is expected to provide current PII information to be able to receive further communication regarding ACC program.
<b>14-2</b>	<b>Describe how an individual could view, correct, update, or ask to amend their PII.</b> After individuals submit their subscription form, they will receive ACC program information. However, they cannot view or edit their submitted contact information. The individuals can unsubscribe and then complete a new subscription to ensure the subscription information is correct and updated.
<b>14-3</b>	<b>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.</b> For the individuals who provide PII via the subscription form, they can cancel their subscription at any time, which would remove their PII permanently. Removal of the PII will not negatively affect an individual.
<b>14-4</b>	<b>State if PII handling processes apply automation technology for decision making and describe the measures taken to eliminate risk to privacy interests.</b> Not Applicable

#### 15- DATA RETENTION AND DESTRUCTION

<b>15-1</b>	<b>Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.</b> AmeriCorps is in the process of identifying record retention schedule for ACC Portal. The records will be retained indefinitely until they are scheduled with the National Archives and Records Administration (NARA) and are eligible for disposition under that schedule.
<b>15-1</b>	<b>Identify the role and process to coordinate with the parties involved the record retention and disposition.</b> The System Owner/Information System Owner will work with the Records Retention Officer to arrange the retention and disposition of records in accordance with the requirement of an identified Records Schedules.

#### 16- SOCIAL SECURITY NUMBERS (SSNs)

<b>16-1</b>	<b>If the system collects truncated or full social security numbers (SSNs):</b> <ul style="list-style-type: none"> <li>a. Explain why the SSNs are required.</li> <li>b. Provide the legal authority for the usage of the SSNs.</li> <li>c. Describe any plans to reduce the number of SSNs.</li> </ul> <b>If the system does not collect any part of an SSN, write <u>Not Applicable</u>.</b> Not Applicable
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#### 17- WEBSITES

<b>17-1</b>	<b>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>.</b>
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	<p>The ACC website is developed in accordance with relevant regulatory requirements. Google Analytics is used to monitor and assess the website's performance, in full compliance with AmeriCorps' web privacy policy (for more details, see <a href="https://www.acc.gov/privacy-policy/">https://www.acc.gov/privacy-policy/</a>). The ACC.gov website also includes a link to an online shop where visitors can browse and purchase symbolic items featuring ACC branding. Before clicking on this link, visitors are shown a privacy disclaimer: "By choosing to click 'Shop', you acknowledge that you are leaving the www.ACC.gov website. We encourage you to read the privacy policy and terms of the other websites you access to understand how they handle your information." This disclaimer informs users they are navigating to a third-party site not affiliated with the ACC system.</p>
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### 18- OTHER PRIVACY RISKS

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

	<p>There may be some potential changes to the data categories maintained in ACC. The system will be subject to a new privacy impact assessment if any changes go into effect.</p>
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