

PEACE CORPS PRIVACY IMPACT ASSESSMENT

Peace Corps System Name and Acronym: AgLearn Next Gen (AGLN-NG); AgLearn Learning Management System (AgLearn LMS)

Managing Office: Office of Staff Learning and Development (OSLD)

PIA Approval date: August 29, 2023

1. Is this a new or revised electronic information system? If revised, describe revisions.

This is a new system.

If any question does not apply, state not applicable (N/A) and explain why.

2. Identify who the Personally Identifiable Information (PII) is collected from:

- Members of the public, including Peace Corps Volunteer applicants and interns
- Federal employees/federal contractors/Peace Corps Volunteers
- Both members of the public (Global Public) and Peace Corps personnel

3. Legal Authority. Cite the legal authorities that permit and authorize the collection of this information by this IT system.

Authority: The Learning Management System (LMS) is authorized by the Government Employees Training Act of 1958, as amended, 5 U.S.C. Chapter 41 – Training (§§ 4101 - 4121) and the Peace Corps Act of 1961, as amended, 22 U.S.C. 2501 et seq.

4. Purpose. Explain the purpose of the system (e.g., nature and source).

AgLearn will replace the current Peace Corps Moodle Learning Management System (LMS) as the Peace Corps official system of training and will contain the training histories for Peace Corps employees, contractors, partners, political appointees, affiliates, volunteers, and customers. Mission areas, agencies and staff offices will use AgLearn to find, enroll, and record all training activities. AgLearn has a robust and secure environment to accommodate approximately 133,000 end users, 3,600 administrators and 28 unique agencies. The primary services of AgLearn include

application, database hosting, and maintenance services as well as licensing and help desk support for end users and agency AgLearn administrators.

5. List all forms of Personally Identifiable Information (PII) that is collected, maintained, or disseminated.

Invitees/Volunteers:

- First Name
- Last Name
- User Account ID
- Home address
- Personal email address
- Post Name/Country location
- Invitee's Candidate Reference Number (CRN)
- Year and quarter invitees arrive at post.
- Resume details (full name, academic information, home address, phone number, personal email address).
- Aspiration statement
- College diploma (college, degree, year received)
- Dates: invitation accepted, start of Pre-Service Training, entry on duty date, close of service date
- Courses enrolled, attempted, completion and grade, if applicable.

Peace Corps University Recruitment:

- First Name
- Last Name
- Personal or academic email
- Courses enrolled, attempted, completion and grade, if applicable.

Peace Corps Staff:

- First Name
- Last Name
- Work and/or personal email address.
- Employee ID number
- Office
- Country work location
- Modified (account modification date)
- Supervisory status
- Supervisor's full name and work email address
- Title
- Courses enrolled, attempted, completion and grade, if applicable.

6. Why is PII being collected (e.g., to determine eligibility)? Does the IT system collect PII directly from individuals, or from another system?

The AgLearn LMS collects PII from Peace Corps Volunteers and Peace Corps staff to ensure that the user has been provided the necessary mandatory, optional and role-based training designated for that individual. The system will also collect the Peace Corps Invitee's resume for pre-departure processing. This is done to provide training records and the resume to the designated staff at the assigned country Post for the Volunteer's service. This information is also being collected to track the completion of mandatory, optional, and role-based training, as applicable, for Peace Corps staff.

7. Sharing and Disclosure.

a. Will the PII from this system be shared with another agency? If yes, list the agency, all types of PII that are shared, and why this is shared outside our agency.

AgLearnLMS is a shared system with the United States Department of Agriculture (USDA). Data is exchanged between the Peace Corps and USDA AgLearn Next Gen (AGLN-NG), which is hosted by the Totara Talent Development Government Cloud Platform (TotaraGov), for the purpose of data communication between information systems for Single Sign-On (SSO) - ADFS. The Peace Corps will send user identity information as part of a Secure Access Markup Language (SAML) assertion to the USDA AgLearn Next Gen (AGLN-NG) application for the purposes of Single Sign-On (SSO). The Peace Corp will also share the PII listed below and non-PII user attributes with the USDA. All users with access to the data exchanged between Peace Corps and USDA AGLN-NG will have completed valid and current agency-specific background investigations.

Invitees/Volunteers:

- First Name
- Last Name
- User Account ID
- Home address
- Personal email address
- Post Name/Country location
- Invitee's Candidate Reference Number (CRN)
- Year and quarter invitees arrive at post.
- Resume details (full name, academic information, home address, phone number, personal email address).
- Aspiration statement
- College diploma (college, degree, year received)
- Dates: invitation accepted, start of Pre-Service Training, entry on duty date, close of service date
- Courses enrolled, attempted, completion and grade, if applicable.

Peace Corps University Recruitment:

- First Name
- Last Name
- Personal or academic email
- Courses enrolled, attempted, completion and grade, if applicable.

Peace Corps Staff:

- First Name
- Last Name
- Work and/or personal email address.
- Employee ID number
- Office
- Country work location
- Modified (account modification date)
- Supervisory status
- Supervisor's full name and work email address
- Title
- Courses enrolled, attempted, completion and grade, if applicable.

b. Is sharing pursuant to a Memorandum of Understanding, Computer Matching Agreement (CMA), or other type of approved sharing agreement with another agency?

Yes, there is an MOU/IAA in place between the Peace Corps and the USDA for AgLearn LMS.

8. Notice of the collection of information.

a. Do individuals have the opportunity to object or to consent to the particular use of their PII prior to collection?

Yes

No

b. If "Yes," describe the Privacy Act Statement (PAS) or notice provided to the individual prior to collection of his or her information. If "No," state the reason why individuals cannot give or withhold their consent. Identify if this is not applicable because information is obtained from an existing information system or source.

The Privacy Statement for the AgLearn Learning Management System is the following:

The Peace Corps, a U.S. government agency, is required by the Privacy Act of 1974 (5 U.S.C. 552a) to advise individuals of the following information regarding this webpage. The Privacy Act addresses the Federal Government's use of certain personal information in agency files. The Peace Corps follows the requirements of the Privacy Act which protects personal information that the agency maintains and uses in its systems of records (SORs).

Authority: The AgLearn Learning Management System is authorized by the Government Employees Training Act of 1958, as amended, 5 U.S.C. Chapter 41 – Training (§§ 4101 - 4121) and the Peace Corps Act of 1961, as amended, 22 U.S.C. 2501 et seq.

Purpose: The personally identifying information you provide will be used to access the Peace Corps' AgLearn Learning Management System, which provides mandated online learning courses and developmental training for Peace Corps staff, Peace Corps Invitees, Volunteers, Returned Peace Corps Volunteers, supporting university recruiters, or individuals who are supporting the Peace Corps mission.

Routine Uses: The information that the individual provides may be used and shared pursuant to Peace Corps' Privacy Act System of Records Notice Routine Uses summarized in Peace Corps' System of Records Notices: PC-17, Volunteer Applicant and Service Records System; PC-18, Former Peace Corps Volunteer and Staff Database; and the Government-wide System of Records OPM GOVT-1, General Personnel Records. Use of the information collected is restricted to the purposes cited in this privacy statement or unless the disclosure is otherwise permitted under the provisions of the Privacy Act of 1974, 5 U.S.C. 552a (b) "Conditions of disclosure," and the agency's privacy policy.

Disclosure: Completion of this form is voluntary; however, failure to provide the requested information will result in the individual's inability to complete their mandatory training requirements and utilize the development courses which may affect any benefits or services that we provide to you.

c. List any Peace Corps form(s) or federal form(s) used to collect PII for this system. Each PC form must have a Privacy Act Statement.

PC-2189 LearningSpace Login page.

d. Provide the OMB Control number and the agency number for the collection if this collection is covered by the Paperwork Reduction Act (PRA).

OMB Control Number: 0420-0573

9. Security.

a. What administrative, technical, and physical security safeguards/controls are in place to protect the PII?

Administrative Controls:

Administrative controls are fully implemented and controlled by the role-based access model built in the AgLearn LMS. The roles enforce separation of duties and least privileges federal compliance standards. Administrative controls are given based on need-to-know basis for position responsibilities. Distributive role assignment from top level administrators can occur based on training completion of the requestor, and alignment to position responsibilities. Administrative controls are assigned to select USDA & Peace Corps administrators. Authorized users are trained in the proper handling of PII and of their official responsibilities under the Privacy Act and Federal government cybersecurity and technical governance for the rules of behavior. Authorized users access the system by logging onto the system using a PIV card and two-factor authentication log-in process. Complete role assignment logging is in place and reviewed annually.

Only the vendor(s) (USDA and Totara) authorized personnel and OSLD administrators have restricted access to the designated system, and its information and is based on a need-to-know basis to fulfill their official duties. OSLD administrators can assign users' roles and limit access to only those who have an official need-to know to perform their official duties. Authorized users are trained in the proper handling of PII and of their official responsibilities under the Privacy Act and Peace Corps cybersecurity and technical governance for the rules of behavior. Authorized users access the system by logging onto the system using a two-factor authentication log-in process. They do not have administrative privileges.

Technical Controls:

The AgLearn LMS secures encrypted data in transit and at rest by transferring it via Secure Sockets Layer (SSL). The training data is encrypted and protected at rest and in transit. The AgLearn LMS will be contained and protected within a virtual private cloud (VPC) on the Amazon Web Services (AWS) east-west cloud infrastructure.

While the vendor (USDA) categorizes the AgLearn LMS as a Moderate system, the Peace Corps assesses the information collected by the AgLearn LMS system as non-sensitive PII, as such, the system categorization is Low.

Physical Controls:

The AgLearn LMS resides on AWS under the FedRAMP high categorization ATO. The secured facilities physical controls are reviewed and approved annually by the USDA annual assessment and authorizations process. Access is restricted to individuals with elevated user privileges. The AWS facility has security guards at the entrance; badge

access is required for entrance into the building; cameras are in place, and the office door is locked, requiring pre-approved electronic badge access.

The Peace Corps Headquarters has the appropriate physical controls in place to ensure restricted access for individuals with elevated user privileges. The facility has security guards at the entrance; badge access is required for entrance into the building; cameras are in place, and the office door is locked, requiring pre-approved electronic badge access.

b. Has a System Security Plan (SSP) been completed for the information system?

Peace Corps is leveraging the USDA SSP.

USDA AgLearn Next Gen (AGLN-NG)
FIPS 199 Categorization: Moderate
Authority to Operate (ATO) Date: September 14, 2021
ATO Expiration Date: September 14, 2024

10. Privacy Act System of Records. Identify the System of Record Notice (SORN) that covers this IT system, or state if a SORN will be created under the Privacy Act, 5 U.S.C. 552a.

OPM GOVT-1, General Personnel Records; PC-17, Volunteer Applicant and Service Records System; PC-18, Former Peace Corps Volunteer and Staff Database.

11. Records Retention and Disposition. Identify the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system, or for the records maintained in the system, as well as the record retention instructions.

Individual employee training records. DAA-GRS-2016-0014-0003, GRS 2.6, item 030 - Temporary. Destroy when superseded, 3 years old, or 1 year after separation.

Non-mission employee training program records. DAA-GRS-2016-0014-0001, GRS 2.6, item 010 – Temporary. Destroy when 3 years old, or 3 years after superseded or obsolete.

Learning Management Database/System Administration Files. DAA-GRS-2013-0005-0003, GRS 3.1, item 051 – Temporary. Destroy 5 years after the project/activity is completed or the system is terminated, or data is migrated to a successor system.

PC Developed Training Records. DAA-490-2016-0002-0003 – Temporary. Cut off at end of calendar year. Destroy 6 years after cutoff.