

PEACE CORPS PRIVACY IMPACT ASSESSMENT

Peace Corps System Name and Acronym: FOIAXpress/Public Access Link (PAL)

Managing Office: Freedom of Information Act (FOIA) /Privacy Act (PA) Office

PIA Approval date: October 12, 2023

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

FOIAXpress/Public Access Link is not a new or revised electronic information system. FOIAXpress is a web-based system that electronically processes FOIA, Privacy Act (PA), and appeal requests/cases. The system configuration coupled with the software and hardware information provides the Peace Corps with the ability to effectively automate the FOIA business process from receipt of the request through delivery of responsive documents. Its PIA was first approved June 17, 2020.

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 and Peace Corps personnel

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

5 U.S.C. 552; 5 U.S.C. 552a; 22 C.F.R. 303; 22 C.F.R. 308; and Executive Order (E.O.) 9397, as amended (SSN); E.O. 13397, "Improving Agency Disclosure of Information

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

FOIAXpress is the online case management system for all of the Peace Corps' FOIA and PA requests. It is hosted by the vendor, Opexus, as a Software as a Service product. It manages and provides case processing, records storage, exemption review layers, and correspondence with the requesters. The PAL component allows a member of the public to create a PAL account, electronically submit and track a FOIA or PA request, receive office correspondence, view and download records related to a case, receive the agency's response, and submit an appeal of a FOIA or PA request denial.

FOIAXpress promotes the utilization of information technology in the Peace Corps' FOIA program and allows for interoperability within the National FOIA Portal.

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

Requester: The PII collected in this IT system is the first, middle, and last name; birth date, place of birth, Social Security number, personal phone number, personal address, personal email address, driver's license number, passport number, Peace Corps Volunteer number, financial information, information associated with being a commercial or media requester, to include business contact information or affiliated news organization.

Peace Corps Personnel: Peace Corps personnel's full name, work email, work phone number, and IP address; and other PII provided in responsive documents collected for a specific case.

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

PII is collected as part of the contact information provided with a submitted request; to identify a FOIA or PA requester associated with a particular case number; to perfect a FOIA request and to respond to a requester; to validate the individual's identity for a PA request; to conduct internal agency business as part of the FOIA or Privacy case; or as part of the responsive records. PII is collected directly from the individual; manually entered by Peace Corps personnel using the agency's active email directory; as well as contained within electronic documents that are manually uploaded as responsive records to a case.

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 is shared, and why this is shared outside our agency.

Information may be shared with other agency FOIA offices to refer a FOIA request, request consultation from another agency on records, or another office for dispute resolution at the choice of a requester, or as listed in the applicable System of Records,

PC-24, Privacy and Freedom of Information Act Requests.

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

No.

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 FOIAXpress/PAL provides the following Privacy Act Statement:

Authorities: 5 U.S.C. § 552, 5 U.S.C. § 552a, 44 U.S.C. § 3101, 22 C.F.R. § 303, 22 C.F.R. § 308, and Executive Order 9397 (SSN) authorize the collection of this information.

Purpose: The Peace Corps collects and maintains this information to process and respond to requests made under the Freedom of Information Act (5 U.S.C. § 552) and the Privacy Act of 1974 (5 U.S.C. § 552a), to locate applicable records, to respond to administrative appeals, to participate in any litigation related to these requests and appeals, and to fulfill any other requirements under either of these laws. Your Social Security number (SSN) or part of your SSN may be asked for to correctly verify you and identify records as part of a Privacy Act request.

Routine Uses: This information may be used by and disclosed to Peace Corps personnel and contractors who need the information to assist in activities related to the processing of your Freedom of Information Act and/or Privacy Act request. Additionally, the Peace Corps may use the information, as necessary and authorized by the routine uses published in System of Records Notice PC-24, Privacy and Freedom of Information Act Requests.

<https://files.peacecorps.gov/multimedia/pdf/policies/systemofrecords.pdf>

Disclosure: Disclosure of this information is voluntary; however, failure to provide the requested information may delay or prevent the Peace Corps from processing your Freedom of Information Act or Privacy Act request

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-2193, Public Access Link (PAL) Account Creation.

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 is pending OMB decision.

9. Security.

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

The administrative and technical privacy risks include unauthorized access, unauthorized disclosure, and a risk that the individual who added PII to FOIAXpress through PAL did not receive an email notice that the information was added at the time of collection. There are administrative, physical security, and technical safeguards in

place to mitigate these risks. This is a FedRAMP-authorized system that has undergone review and authorization of administrative, technical, and physical security safeguards and controls. Security control assessment is also conducted on an annual basis to ensure the security controls are still working as intended and are yielding desired outcomes.

Administrative Controls: Only authorized FOIA personnel have restricted access to the system and its information based on a need-to-know basis to fulfill official duties. Access to the system's nonpublic records is restricted to Peace Corps personnel or contractors whose responsibilities require access. The senior FOIAXpress administrator assigns user roles to FOIA/PA personnel who have an official need to know to perform their duties within the system. Authorized users are trained in the proper handling of personally identifiable information and their official responsibilities under the Privacy Act and Peace Corps technical governance for the rules of behavior. The vendor, Opexus, has access to the data in the capacity as the administrator and service provider for the system.

Physical Controls: The appropriate controls are in place. The vendor's server location meets physical security requirements.

Technical Controls: FOIAXpress users gain online access solely through the Peace Corps network, then use a unique username and password for the protected entry point into the system. Through FOIAXpress, the office users can see the individual requester's identity and contact information for the PAL user and submitted requests to the agency through PAL. This is the same information that the individual is required to provide in a FOIA or Privacy Act request to the agency. The FOIAXpress Program Manager can employ additional audit trail procedures about system users and track activity on specific FOIA requests, as necessary. PAL has a public-facing account for individual FOIA requesters. The individual accesses PAL using the secure Hypertext Transfer Protocol Secure page from the main peacecorps.gov website. The PAL user is required to create a password that meets Peace Corps minimum password complexity rules and is encrypted. The PAL user profile and privileges are limited to only accessing the individual's PAL profile, as well as designed to correspond with the FOIA Office, submit a FOIA request or appeal, and download any release records provided in response to a FOIA case. The Federal Information Processing Standard (FIPS) 199 security impact category for this system is moderate.

b. Has a system security plan been completed for the information system?

Yes. The Authority to Operate (ATO) is in place through March 10, 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.

PC-24, Privacy and Freedom of Information Act Requests

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.

GRS 4.2, DAA-GRS-2016-0002-0001. The Record retention instructions are “Retention of six years after closure if there is not any appellate action, then delete after the new Fiscal Year.” <https://www.archives.gov/files/records-mgmt/grs/grs04-2.pdf>