

PEACE CORPS PRIVACY IMPACT ASSESSMENT

Peace Corps System Name and Acronym: Learning Management System (LMS)

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

PIA Approval date: March 1, 2023

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

No, this is not 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 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).

LMS is an externally hosted, web-based learning management system. The platform delivers mandated electronic learning courses and developmental training to Peace Corps (PC) staff and Volunteers. In addition, the system will be used for Pre-departure (Invitees) and In-service training for Volunteers.

LMS is based on a Modular Object-Oriented Dynamic Learning Environment (Moodle) and is managed by the e-Think vendor on the Amazon Web Services (AWS) east-west cloud.

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 LMS system collects Volunteer and staff personal identifiable information to ensure that the user has been provided the necessary mandatory, optional and role-based training designated for that individual. The system will 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 is shared, and why this is shared outside our agency.

No, unless it falls under the routine uses under the applicable Government-wide and Peace Corps' Privacy Act System of Records Notice: OPM GOVT-1, PC-17, or PC-18. Please refer to the answer for question 10.

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

N/A.

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 LMS 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.

Authority: The 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 information you provide will be used to access the Peace Corps' 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 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.

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.

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).

The OMB Control Number for this system is: 0420-0573

9. Security.

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

Administrative controls: Only the vendor (e-Think) authorized personnel and OSLD administrators have restricted access to the designated system, and its information 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.

Physical controls: The system resides on AWS, a secured facility and verified by our security group. 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.

Technical controls: The Peace Corps secures encrypted data in transit and at rest by transferring it via SSL. The training data is stored encrypted and protected by Amazon RDS. The LMS system will be contained and protected within a virtual private cloud (VPC) within the e-Think on the Amazon Web Services (AWS) east-west cloud infrastructure. The information collected by LMS system is considered non-sensitive PII and the system categorization is low.

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

Yes.

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.

Please refer to the following items for full records coverage:

Training Records, Disposition Authority: DAA-0490-2016-0002-0003.

Learning Space Administrative Files, Disposition Authority: DAA-GRS-2013-0005-0003

Training Program Records, Disposition Authority: DAA-GRS-2016-0014-0001