

PEACE CORPS PRIVACY IMPACT ASSESSMENT

Peace Corps System Name and Acronym: LinkedIn Learning

Managing Office: Office of Staff Learning and Development

PIA approval date: June 21, 2023

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

This is a revised system. LinkedIn Learning and prior to it, Lynda.com have been used by the Peace Corps for more than five years providing staff access to a large library of online learning content. Peace Corps has the ability to request that LinkedIn Learning enable the option for staff to voluntarily consent to link their Peace Corps LinkedIn Learning account to their personal LinkedIn profile (if they have one).

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.

The Peace Corps Act of 1961, 22 U.S.C. Chapter 34, § 2503; the Federal Information Security Modernization Act (FISMA), 44 U.S.C. Chapter 35 § 3551.

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

LinkedIn Learning is used for training and development. Peace Corps staff can enroll in training that they see beneficial. There are a wide variety of courses such as business analysis, personal branding, database management, and graphic design.

Staff have requested the option to link their personal LinkedIn profiles to their Peace Corps LinkedIn Learning accounts in order to feature their LinkedIn Learning course completion badges and other professional certifications within their personal LinkedIn profiles.

5. List all forms of Personally Identifiable Information (PII) that is collected, maintained, or disseminated. (Examples include first name, middle name or initial, last name, alternate names, birth date, place of birth, Social Security Number (full or partial), personal telephone number, personal address, personal email address, residency)

during service or host family address, family member information or third person contacts, driver's license number, passport number, Peace Corps Volunteer number, other ID number, gender/gender preference, race or ethnicity, religious preference, marital status, military service status or military records, legal, security, or law enforcement information or status, disability information or status, financial information, educational information, IEP address, MAC address, biometrics, photograph, electronic Protected Health Information.)

Information collected from Peace Corps staff when activating their LinkedIn Learning account:

- First name
- Last name
- Peace Corps email address

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 already being collected from Peace Corps staff in order to determine their eligibility under the enterprise licensing agreement to activate their LinkedIn Learning Account. The LinkedIn Learning IT system collects first name, last name and Peace Corps email address. PII in section 5 is collected directly from individuals to determine Peace Corps Staff eligibility in order to activate their LinkedIn Learning Account. No additional information is required or collected in order to opt-in to connect their personal LinkedIn profile with their LinkedIn Learning account.

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.

The information is not and will not be shared with any other agencies.

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

Not applicable (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.

Peace Corps staff are not required to have personal LinkedIn account and activate a Peace Corps account with LinkedIn Learning. Staff have full control to consent to link their personal LinkedIn account to their Peace Corps LinkedIn Learning account.

Peace Corps staff and Volunteers can access the LinkedIn Privacy Policy using the following link: <https://www.linkedin.com/legal/privacy-policy>.

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.

N/A.

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

N/A.

9. Security.

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

Administrative Controls:

Each LinkedIn Learning account holder has a unique account login (Peace Corps email address and password). Authentication through single sign on is enabled for Peace Corps staff members as the default connected Security Assertion Markup Language (SAML) type under the connection name Active Directory Federation Services (ADFS). All Peace Corps staff members are required to go through single sign-on (SSO). Authentication using the configuration name "ADFS." Users are automatically provisioned a license when they click an activation link provided they are authenticated through the "ADFS" configuration. Peace Corps authorized administrators activate the user licenses and has the ability to de-activate and purge accounts of staff when they leave the Agency.

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

N/A. LinkedIn is a cloud-based software as a service that Peace Corps utilizes but does not manage. LinkedIn maintains all aspects of security for their platform and the service.

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

LinkedIn Learning is a tool. No System of Record Notice will be created under the Privacy Act, 5 U.S.C. 552a.

11. Records Retention and Disposition. Identify the National Archives and Records Administration (NARA) approved, pending or general records schedule

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(GRS) disposition authority for the system, or for the records maintained in the system, as well as the record retention instructions.

N/A.