

## PEACE CORPS PRIVACY IMPACT ASSESSMENT

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**Peace Corps System Name and Acronym:** Peace Corps Emergency Notification System (PCENS)

**Managing Office:** Office of Safety and Security

**PIA approval date:** May 10, 2023

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

This is not a new system; however, there have not been any new changes.

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.**

22 U.S.C § 34. 2501(a) et seq., The Peace Corps Act of 1961, as amended; 40 USC 11315, Agency Chief Information Officer; 44 USC 3506, the Paperwork Reduction Act, as amended by the Information Technology Management Reform Act of 1996, Section 5125(a) of Pub. L. 104-106 (Clinger-Cohen Act); 44 USC 3541 et seq., the Federal Information Security Management Act of 2014 (FISMA), Public Law 113-283; OMB Circular A-130, Management of Information Resources.

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

The Office of Safety and Security requires a tool to rapidly communicate with Peace Corps staff in the event of an emergency. This system is called "Peace Corps Emergency Notification System" (PCENS), and the company that has been contracted to provide this service to the Peace Corps is called Everbridge. This system is used to

communicate in the event of an emergency affecting the safety or security of staff or the continued performance of essential agency operations at the Peace Corps headquarters building in Washington, DC.

Peace Corps staff members are invited to enter their work and personal phone numbers and email addresses into PCENS. Peace Corps will then be able to send emails, texts, and voice messages to these included devices. Messages may request that recipients confirm or respond to polls, may invite recipients to join conference calls, or may provide attachments detailing additional information or instructions.

**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.)*

PCEN is pre-populated by an upload of information currently stored in the Peace Corps' active email directory, through the Personnel Tracking System (PTS) for all domestic and overseas staff including employees, contractors, interns, and work study students. This information includes the individual's first name, last name, employment type, work email address, unique ID number from PTS, office name, position title, and country in which they work.

Peace Corps Volunteers' information is pre-populated in PCENS with information currently stored in the Peace Corps' Volunteer Information Delivery Application (VIDA). This information includes the individual's first name, last name, personal email address, personal phone number(s), volunteer identification number, and the longitude and latitude coordinates of their volunteer site residence. PCENS is a tool that an overseas Post may elect to use to improve emergency accountability for Peace Corps personnel entering the area under the responsibility of a Country Director.

Individuals are asked to provide additional contact information once invited to PCENS. They have the opportunity to decline providing additional contact information. Not entering complete contact information could affect the ability to contact the individual in case of an emergency or important alert. Additional contact information includes: work desk phone number, work cell phone number for voice and text messages, personal cell phone number for voice and text messages, personal home landline phone number, and personal 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?**

The information is being collected to provide the Peace Corps with the means to communicate to all Peace Corps personnel prompt alert notifications before, during, or after an important event or emergency via text and voice messaging. The legal authority to collect this information is the Peace Corps Act, 22 U.S.C. 2501, et. Seq. (Public Law 87–293, as amended); the Homeland Security Act of 2002, 6 U.S.C. § § 501-521, National Emergency Management; as amended; 6 U.S.C. § 572, National Emergency Communications Plan; Post-Katrina Emergency Management Reform Act of 2006, 6 U.S.C. § 701, et. Seq.; the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 USC §§ 5121–5207; Title 41, Code of Federal Regulations, Chapter 102, the Federal Management Regulation (FMR), Part 102-74 (41 CFR § 102-74.230 - 102-74.260); National Security Presidential Directive – 51 and Homeland Security Presidential Directive - 20; Homeland Security Presidential Directive 12; Federal Continuity Directive 1; Executive Order (EO) 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions, as amended; EO 12656, Assignment of Emergency Preparedness Responsibilities; Peace Corps Manual Section (MS) 125, Office of Global Operations: Organization, Mission, and Functions; MS 130, Office of Safety and Security: Organization, Mission, and Functions; and MS 270 Volunteer/Trainee Safety and Security.

**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.**

Yes, information may only be shared with the Department of State, the Department of Homeland Security/Federal Emergency Management Agency, the Department of Justice, or local government emergency response teams in the event of an emergency, natural disaster, or terrorist event. The response efforts and personnel accountability fall under the purview of the said agency, and when personnel are determined to be in danger and/or need immediate assistance in response to the qualifying event.

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

There are no sharing agreements.

**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 individual cannot consent or object to the initial use of the PII pulled from the active email directory through PTS, or consent or object to PII copied from VIDA. Individuals are given the opportunity to decline or consent to providing additional information when they log into the website. Individuals can amend the record by logging into the account and change or update their information.

Email invitations will include a Privacy Act Notice stating that providing personal contact information is voluntary. However, not entering contact information will affect the ability to contact the individual in case of an emergency or required alert and provide necessary services. While all personnel will be invited and encouraged to provide information, it is not required. The PCENS webpage Privacy Act Notice banner states that providing your personal contact information is voluntary. However, not entering contact information will affect the ability to quickly notify individuals of an emergency, a required alert, or provide follow-up guidance or necessary services in response to an event.

**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.**

Not applicable (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?**

The administrative and technical privacy risks include unauthorized access, unauthorized disclosure, and a risk that the individuals whose information is added to PCENS from the active email directory/PTS will not receive a notice that their information is being added to PCENS at the time of collection. There are administrative, physical security, and technical safeguards in place to mitigate these risks.

Administrative Controls: Only authorized administrators at headquarters and overseas posts have restricted access to the system and its information based on a need-to-know basis to fulfill official duties. The senior PCENS site administrators assign user roles to limit access to only those who have an official need to know to perform their duties. Authorized administrators 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. Everbridge, the vendor, has access to the data in the capacity as the administrator and service provider for the system.

Technical Controls: Access controls and user account authentication mechanisms are used in securing the information/data, such as username and password. Active email directory information is downloaded from PTS and entered onto spreadsheet that is then uploaded into Everbridge for PCENS account creation. Security measures are in place specifically to meet FISMA Moderate and FedRAMP Moderate requirements. Everbridge encrypts the transmission of data using up-to-date security technology (e.g., TLS). The Authority to Operate for PCENS was issued on October 10, 2018; it is currently undergoing recertification. PCENS is compliant with the Federal Information Security Management Act (FISMA).

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

Yes, it was completed on April 10, 2023.

**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-36, Peace Corps Computer Systems Activity and Access Records.

**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.**

The Peace Corps retains information in PCENS pursuant to the National Archives and Records Administration's GRS 5.3, item 010 and item 020, and GRS 5.2, item 20. The PCENS Administrator will notify Everbridge to delete separated or transferred personnel user accounts. Everbridge will then delete a user account after 30 days of notification. All data is deleted 30 days after contract expiration.