

# PEACE CORPS PRIVACY IMPACT ASSESSMENT

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**Peace Corps System Name and Acronym:** Peace Corps General Support System (PCGSS)

**Managing Office:** Office of the Chief Information Officer

**PIA Approval date:** September 6, 2023

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

The Peace Corps General Support System (PCGSS) electronic information system has undergone revisions since the last Privacy Impact Assessment (PIA) was completed. A major change is the introduction of FedRAMP Moderate Cloud Service Offerings (CSO) that will be contained within the PCGSS authorization boundary.

PCGSS has introduced FedRAMP Moderate authorized Microsoft Office 365 Multi-Tenant & Supporting Services Software as a Service (SaaS). Office 365 Multi-Tenant is a Software as a Service offering with non-government and government instances of some Office 365 Multi-Tenant services include Exchange Online, SharePoint Online OneDrive for Business, and Microsoft Teams. The government specific instances are designated for the sole use of U.S federal, tribal, state, and local government customers, U.S. government contractors, and Federally Funded Research and Development Centers (FFRDCs). Office 365 delivers customers with familiar productivity, communication, and collaboration capabilities all in a service that is reliable, secure, and able to rapidly scale up or down to meet variable resource demands.

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. subsection 2501. et seq., the Peace Corps Act.

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

The PCGSS provides network (local and wide area) infrastructure, security architecture and core information technology (IT) services implemented to support Peace Corps' global mission and business processes.

PCGSS consists of network, core, domestic support, post support, platforms, messaging, and cloud services for supported applications. These core components provide essential resources to support domestic/international Peace Corps staff and volunteers. Network services contributes to establishing a fundamental IT communication structure from the low to the high layer of IT services. The end-to-end network service activity is the result of the combination of the individual network function behaviors as well as the behaviors of the network infrastructure composition mechanism. Network services consists of WAN, LAN, Network Applications, Network Security, VPN, VoIP, and Wi-Fi. Network services are continuously monitored and maintained daily by Network Operations (NOPS) team.

In addition, the PCGSS provides the foundation services that maintain the storage of large collections of data, essential identity management systems and mechanisms to manage critical services. These services require an extensive amount of storage and management tools for access management. Disaster Recovery, Virtualization, Storage/Backup, Servers, System Management, Platforms, Identity Management and End User Devices support the enterprise business at Peace Corps HQ, the RROs, and International Posts. These noted components provide the foundation of agency core services with key elements required for operation distributed throughout the global environment to support Staff & Volunteers. The PCGSS provides the network and service infrastructure to support Peace Corps business processes that include, but are not limited to, finance, volunteer health care and volunteer staffing. All systems are continuously monitored and maintained daily by the Hosted Services Team.

Platform services: Collaboration services provide a mechanism to share, organize and secure information within the agency environment. Systems help manage and maintain customer relationships and deliver actionable data.

Messaging Services: Messaging consists of the communications via email, instant messaging, and mobile devices to permit real-time delivery of essential business electronic mail.

Cloud Services: Supports many different tools and frameworks, including both Microsoft-specific and third-party software and systems.

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

PCGSS is the Network Computer, back up and Network Storage infrastructure for the Peace Corps and does not collect PII directly. The authority to collect PII is documented

in the System of Records Notice (SORN) and/or PIA documentation of the systems that directly collect PII.

PCGSS platforms, messaging, and cloud services for supported applications may contain PII that is collected, maintained or disseminated, to 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.

**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 sensitive PII is collected by other Peace Corps systems for reasons that are stated within the individual systems' PIA and stored within secured databases. PII is also collected by internal Peace Corps information systems to manage employees and Peace Corps systems such as IP address, MAC Address, work numbers, usernames, first name, middle name, and last name.

**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, the information the PCGSS collects will not be shared with another agency. If an individual system that sits on PCGSS decides to share information, it should be documented in the PIA of that particular system.

**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.**

The PCGSS does not directly collect PII and is only the storage medium for Peace Corps systems. PII that is collected is for management of Peace Corps employees, contractors and collection of PII is mandatory but limited to only PII necessary for job functions.

**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?**

PCGSS is required to follow the NIST SP 800-37 800-37, Rev.2 Risk Management Framework for Information Systems and Organizations. PCGSS is continuously subjected to the RMF Prepare, Categorize, Select, Implement, Assess, Monitor and Authorize tasks. In addition, PCGSS follows all Peace Corps Policies, Procedures and Standards.

PCGSS undergoes an annual security assessment of administrative, technical, and operational security controls derived from NIST SP 800-53. Rev. 4 Security and Privacy Controls for Federal Information Systems and Organizations. Using the NIST SP 800-53 Rev. 4 Assessing Security and Privacy Controls in Federal Information Systems and Organizations methodology of examine, interview, and test, Peace Corps selected moderate security controls are assessed by an independent third party to validate that the security controls are in place and operating as intended.

PCGSS has introduced within its boundary FedRAMP Moderate Cloud Service Offerings (CSO). PCGSS administrators and security personnel review FedRAMP security packages and configure, implement, and test customer responsible security controls prior to being granted an Authority to Use (ATU) / Authority to Operate (ATO) from the Authorizing Official (AO).

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government customers, U.S. government contractors, and Federally Funded Research and Development Centers (FFRDCs). Office 365 delivers customers with familiar productivity, communication, and collaboration capabilities all in a service that is reliable, secure, and able to rapidly scale up or down to meet variable resource demands.

Microsoft Office 365 Multi-Tenant & Supporting Services is a moderate SaaS that has a current FedRAMP Agency ATO.

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

PCGSS has a current System Security Plan (SSP) that is reviewed and approved by the AO or designated representative prior to plan implementation. The PCGSS ISSO updates the SSP to address:

- changes to the information system/environment of operation
- problems identified during plan implementation
- problems identified during security control assessments

**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  
OPM/GOVT-10, Employee Medical File System Records  
PC-3, Contractors and Consultants Files  
PC-11, Personal Services Contracts  
PC-17, Peace Corps Volunteer Applicant and Service Records System.  
PC-18, Former Peace Corps Volunteer and Staff Database.  
PC-26, Peace Corps Computer Systems Activity and Access Records.  
PC-36, Personnel Accountability System

**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.**

Provides platform for program offices. PCGSS will not directly modify or delete any records associated with programs in PCGSS. PC program offices are responsible for all records management requirements.

DAA-GRS-2013-0005-0008 / GRS 3.1, item 012: Special purpose computer programs and applications.

Computer software programs or applications that are developed by the agency or under its direction solely to use or maintain a master file or database authorized for disposal in a GRS item or a NARA-approved records schedule.

DISPOSITION: Temporary. Delete when related master file or database has been deleted.