

## PEACE CORPS PRIVACY IMPACT ASSESSMENT

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**Peace Corps System Name and Acronym:** Volunteer Reporting and Grants (VRG)

**Managing Office:** Office of Global Operations

**PIA Approval date:** March 23, 2023

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

New

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, as amended, 22 U.S.C. Chapter 34, § 2504.

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

Volunteer Reporting and Grants (VRG) is an electronic database program for currently serving Volunteers and post staff to plan, manage, and track grant program and project activities including those funded by small grants, and to report on their results into the portal. This programmatic work is implemented in collaboration with community partners in furtherance of Peace Corps' three goals. HQ staff use the system to manage the project frameworks and grant programs available at each post.

Through the electronic portal, Volunteers create an account in Login.gov, which will create a secure and private connection with their personal record in Peace Corps' contact database, Agency Customer Relationship Management (Agency CRM). The encrypted portal gives Volunteers access only to the records pertaining to them. VRG links the Volunteer's record in the Volunteer Information Database Application (VIDA) with the programmatic activities, grants, indicator results, and stories they create and

input into the VRG. Staff members from the Office of Gifts and Grants Management run a report to extract the donation information from Odyssey, then this is imported into VRG.

No Personally Identifiable Information (PII) is exported from VRG into any other system, either automatically or manually.

**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.*

Volunteers can list the full name and email address for potential donors (referrals) to Peace Corps Partnership Program (PCPP) grants.

When a financial donation is made, the donor's full name, email address, mailing address, and phone number will be collected in VRG. Donors may also list the name, email, and mailing address of honorees if they are making a donation in honor of or in memory of someone. That information is initially provided by the donor through the donate page ([www.peacecorps.gov/donate](http://www.peacecorps.gov/donate)), is then transmitted to Odyssey (the system of record for donation information) before being synced to VRG. Honorees have no control over whether someone else chooses to honor them and share their information.

Volunteers' VIDA profile can be accessed through VRG by VRG users with VIDA permissions. User access requests are sent to the VRG inbox ([vrg@peacecorps.gov](mailto:vrg@peacecorps.gov)), then the System Administrator grants the permission. Some personal VIDA information is also visible to the Volunteer through the Portal. Volunteer Sites, Site Locations, and Site Contacts are all VIDA records that link to Activity and Grant records collected in VRG.

System Administrators are able to see globally unique identifiers (GUIDs) for every record in the database.

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

PCPP Referrals' name and email are stored in VRG for the purpose of sending them an automated notification when a Volunteers' PCPP grant is posted online for fundraising

so that they can choose to contribute to the project. Information on PCPP Donations is transmitted from Odyssey to VRG so that donors can receive automated tax receipt and thank you messages and honorees can be informed when a donation is made in their honor. This also enables staff in the Office of Gifts and Grants Management to better report on donations and manage relationships with repeat donors.

VRG does not require Volunteers to input PII specifically into VRG. However, the Volunteer's personal information integrated from VIDA is linked with the information entered by the Volunteer about their programmatic work with their communities. The inclusion of VIDA Volunteer personal information (Volunteer Sites, Site Locations, and Site Contacts) enables a full picture of the program work reported by Volunteers.

## **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.

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

This is not applicable.

## **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.**

Donors to the Peace Corps Partnership Program can choose on the Peace Corps donate webpage ([www.peacecorps.gov/donate](http://www.peacecorps.gov/donate)) whether they wish to remain anonymous to the Volunteers and whether they consent to be contacted by Peace Corps beyond the required tax acknowledgement communication. The Peace Corps' Donate webpage and Odyssey are existing information sources and the collection of this data in VRG merely facilitates communication and reporting.

Regarding Volunteer notification: No, because the PII is obtained from an existing information system (VIDA) and merely connected to VRG.

**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.**

Both the Volunteer Portal and the Donate page on the Peace Corps website also link to the agency's Privacy Act Statement. PC-2143, Donation form, may list information that is integrated into VRG. The Privacy Act Statement for donors is:

The Peace Corps, a U.S. government agency, is required by the Privacy Act of 1974 (5 U.S.C. 552a) to advise you of the following information regarding this form and how we protect personal information that the agency maintains and uses in its systems of records.

**Authority:** The Peace Corps Act (22 U.S.C. 2501 et seq.), as amended, authorizes the Peace Corps to accept gifts in furtherance of the purposes under the Act.

**Purpose:** The primary use of the information on this form is to process your financial donation.

**Routine Use:** Use of the information collected on this form is restricted to the purposes cited in this privacy statement or unless the disclosure is otherwise permitted under the provisions of the Privacy Act of 1974, 5 U.S.C. 552a (b) "Conditions of Disclosure," and the agency's privacy policy. The information you provide on this form may be shared under the general system of records routine uses A through M that apply to this system. For information on these routine uses, click on the link to the Peace Corps Privacy webpage. This information collection is covered by System of Records Notice PC-10, Office of Private Sector Initiatives Database. Your name and donation amount may be disclosed as part of a valid FOIA request to obtain access to donor information collected by the Peace Corps as an independent agency under the Executive branch of the United States government. The agency is committed to ensuring that any personal information it receives is safeguarded against unauthorized disclosure.

**Disclosure:** Completion of this form is voluntary; however, failure to complete this form may impair or delay the Peace Corps' ability to process your donation.

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

Information from the Donation Form, PC-2143, is covered under OMB Control number 0420-0564.

**9. Security.**

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

Every IT system has certain privacy risks. The administrative and technical privacy risks include unauthorized access and unauthorized disclosure. There are administrative, physical, and technical safeguards in place to mitigate these risks. For

example, the Volunteer may log in to the Portal from a public computer and fail to log out, but automatic session timeouts after 15 minutes of inactivity will be enforced.

Administrative controls are the following: Only designated Peace Corps personnel have authorization to access VRG through the Agency CRM. Individuals are assigned to security roles and teams based on their work-related duties. Some users may have read-only access, while others may have limited create, edit, and delete privileges to specific sets of records based on the sensitivity and data governance rules of each type of record. Users at a post will only have access to the records pertaining to their post, while HQ users may access all posts.

Peace Corps staff members and contractors receive basic access after taking initial privacy and security training, with recurring annual training. All Peace Corps personnel are responsible for the proper handling and protection of PII to include PII within this IT system. Those who have an official need to access VRG must have their supervisor or designated official submit an access request on their behalf, which will be reviewed by the Product Owner and processed by the System Administrator. The Peace Corps Volunteer only has access to their own profile and the associated information that they are responsible for creating and reviewing.

Agency physical safeguards for this IT system's location includes guards, restricted access, identity badge verification, and cameras.

Technical safeguards and audit controls are in place to fulfill the National Institute of Standards and Technology's requirements. There is a role-based security model in place, i.e., people have access to application based on their role and are granted access to information accordingly. The staff side of VRG on Agency CRM is a web-based platform on the Peace Corps network and only accessible through the Peace Corps firewall and other network access controls. The Portal side communicates with agency CRM via encrypted Transport Layer Security protocol. Data at Rest and Data in Transit is encrypted to meet all Federal Information Processing Standards. Offline data can be cached in the local database within the Volunteer's browser. This database is encrypted; there is not any PII stored offline.

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

Yes, this was completed on September 3, 2021.

**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.**

VRG is covered by agency SORN PC-17, Peace Corps Volunteer Database Management System. Any donor information is covered by PC-10, Office of Private Sector Initiatives 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.**

DAA-GRS-2013-0008-0001 [GRS 1.2, item 020] – Grant and Cooperative agreement case files – Temporary. Destroy 10 years after final action is taken on file, but longer retention is authorized if required for business use.

DAA-GRS-2013-0003-0001 [GRS 1.1, item 010] – Financial transaction records related to ... “fulfilling financial obligations to grant and cooperative agreement recipients” and “and receipt of donations, bequests, and other collections from the public....” Temporary. Destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use.