AmeriCorps
Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information technology (IT) system:	AmeriCorps Child Care Benefit System
1-2	System Identifier (3 letter identifier):	ACB
1-3	Unique Investment Identifier (Exhibit 53):	485-000000020
1-4	Office or entity that owns the system:	AmeriCorps
1-5	Office or entity that manages the system:	GAP Solutions, Inc. (GAP)
1-6	State if the system is operational or provide the expected launch date:	Operational
1-7	System's security categorization:	Moderate
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	August 30, 2022
1-9	Approximate number of individuals with personally identifiable information (PII) in the system	7,334

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)			
	Role	*Signature*	*Date*
3-1	Information System Owner:		
3-2	Office of General Counsel:		
3-3	Chief Privacy Officer:		
3-4	Chief Information Security Officer:		
3-5	Senior Agency Official for Privacy:		

4- PIA HISTORY	
4-1	**State whether this is the first PIA for the system or an update to a signed PIA.**
	This is an update to a signed PIA.
4-2	**If this is an update, describe any major system changes since the last PIA.** **If this is the first time a PIA is being completed, write <u>Not Applicable</u>.**
	• Operating System (OS) upgraded to Window Server 2016 • Adobe ColdFusion 2021

5- SYSTEM PURPOSE	
5-1	**Describe the purpose of the system.**
	AmeriCorps offers childcare benefits to AmeriCorps State and National, VISTA, NCCC, and FEMA Corps members who meet the eligibility requirements. The AmeriCorps Childcare Benefits System (ACB) is designed to help AmeriCorps members and their families successfully apply for childcare benefits that are part of a package of benefits for members performing public service. The program website is located at https://americorpschildcare.com where the authorized members can access and complete a standardized enrollment form, which then allows payments to be processed and made to the AmeriCorps Members' childcare providers. The ACB system is run by GAP Solutions, Inc. (GAP) that manages almost all aspects of the program. The system is located in a datacenter under an Infrastructure as a Service (IaaS) contract administered by Rectitude 369, which is FedRAMP Authorized as the VMware vCloud® Government Service (VCGS).

6- INVENTORY OF PII	
6-1	**Provide a list of all the PII included in the system.**
	The elements of PII in the system include: • Name • Gender • Date of birth and age • Birth Certificate • Home, cellular, and fax number • Email address • Mailing and physical address • National Service Participant ID (NSPID) number • HIPPA Mental Health Information (when applicable) • Social Security and Tax ID Number

	• Child Care License and Business License Number • Driver's License and/or State ID Number

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM

7-1	**Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.**
	The categories of individuals whose PII is in the system include: 1. AmeriCorps Service Member (Member) who apply for childcare benefits. 2. The Member' children (generally one or two), supervisor, spouse, and anyone else who lives in their household. 3. Child Care Provider (Provider) who wants to care for a member's child and receive a reimbursement • 4826 Members are registered in ACB. • 2508 Providers are registered in ACB.

8- INFORMATION IN THE SYSTEM

8-1	**For each category of individuals discussed above:**
	    a. **Describe the information (not just PII) collected about that category.**
	    b. **Give specific details about any PII that is collected.**
	    c. **Describe how the information is used.**

	ACB includes information about Members who voluntarily enroll to receive childcare benefits.
	
	When a State and National or VISTA Member enrolls or receives childcare, ACB may collect the following information about that Member to validate their identity, establish their eligibility to participate, and process the approved subsidies:
	• their name, date of birth, NSPID number, program affiliation, dates of service, worksite, home and cell phone number, email address, and current address
	• their supervisor's name and contact information
	• their children who require childcare's names, school enrollment information, child custody agreements or court orders, and birth certificates
	• their spouse's name, home phone number, email address, current address, employment status and, if the spouse is:
	    ○ unemployed, information about their last job including the name and phone number of their supervisor
	    ○ enrolled in a job training or educational program, information about that training or program
	    ○ self-employed, their business license and a business profit/loss statement

- the name, age, and gender of other persons in the Member's household and their relationship to the Member
- information of other persons in the member's household who is 18 or older, including:
  - total monthly income, where it comes from (e.g., child support, scholarships), and proof of that income
  - federal tax returns (which include social security numbers (SSNs)), in addition, paystubs of a whole month, a description of their current academic pursuits, or information showing whether they are seeking work

When a NCCC or FEMA Corps Member enrolls or receives childcare, ACB may collect the following information about that Member to validate their identity, establish their eligibility to participate, and process the approved subsidies:
- their name, date of birth, NSPID number, program affiliation, dates of service, worksite, home and cell phone number, email address, and current address
- their supervisor's name and contact information
- their children who require childcare's names, school enrollment information, child custody agreements or court orders, and birth certificates
- their spouse's name, home phone number, email address, current address, employment status and, if the child is living with a spouse who is:
  - unemployed, information about their last job including the name and phone number of their supervisor
  - enrolled in a job training or educational program, information about that training or program
  - self-employed, their business license and a business profit/loss statement

NCCC and FEMA Corps Members do not provide information about other household members because they live on a campus apart from anyone who could provide childcare. They only need to provide their spouse's employment information if a child is living with that spouse because the eligibility requirements are different under this circumstance.

ACB also includes information about Providers who take care of Members' children and then request payment for their service. An individual who applies for or becomes a Provider provides their name, business name and type, email address, current mailing address, address where care is provided, phone and fax number, Tax ID or Social Security Number (SSN), any relationship between the child and Provider, W-9 tax form, bank account information (e.g., name of bank and account number), cost of care, and money earned. Licensed Providers must also provide a State Child Care License while unlicensed Providers must also provide a copy of a current driver's license or valid state ID and signed Social Security Card.

When organizations apply or become a Provider, all the above information is about the organization. At most, an organization may name an employee and provide

their business contact information. GAP uses this information to establish that the Provider is qualified, confirm what care they provided, pay for their services, and report the total payment amounts to the Internal Revenue Service (IRS) at the end of the year

The exact information collected by GAP is documented in the forms located at: https://americorpschildcare.com/index.cfm?tab2

9- COLLECTIONS OF PII INTO THE SYSTEM	

9-1	**Describe for each source of PII in the system:**
	  1- **The source.**
	  2- **What PII comes from that source.**
	  3- **How the PII enters the system.**

	GAP staff use the My AmeriCorps Member Support Portal (part of the Electronic System for Programs, Agreements & National Service Participants or eSPAN) to verify that each applicant is eligible for childcare and to find their NSPID number and copy it into ACB. All other PII in ACB comes from Members and Providers. They can type and upload information directly into ACB, or send documents to GAP to upload into ACB. As part of the overall Child Care Benefits Program, there is a helpdesk that will address questions and help facilitate the entry of data if Members or Providers are having difficulty updating/entering their information.
9-2	**If any PII comes directly from the individual, describe the privacy controls in place. If all PII comes from a secondary source, write <u>Not Applicable</u>.**
	Members receive a Privacy Act Statement (PAS) at or before they provide PII collected into ACB. The PAS is located on the contact, login, and registration page of americorpschildcare.com, individuals must see one of these pages before they can access the parts of the website that collect their PII. The PAS is also included on all the forms that collect information from Members. In addition, the AmeriCorps Child Care Program Fact Sheet lists the childcare eligibility requirements, which explains why PII is requested beyond just contact and membership information. The collection of PII into ACB is secured via a secure website directly into the database. The applicant also has the option to use a secure HIPPA compliant fax number through eFax or an encrypted email, then the information is manually entered into the application by the AmeriCorps Gap representative. The website includes a PAS located at: https://americorpschildcare.com/index.cfm?tab7. The login page for the website invites all individuals to review that PAS before logging in.

9-3	If PII about an individual comes from a source other than the individual, describe:
	    a. Why the PII is collected from the secondary source.
	    b. Why the PII from the secondary source is sufficiently accurate.
	    c. If/how the individual is aware that the secondary source will provide their PII.
	If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.

	My AmeriCorps Member Support Portal is part of the AmeriCorps system that tracks all Member information by using NSPID number. The essential PII in the system should be accurate so that the tracking processes can proceed further. Members may provide information about their supervisor, their spouse, their children, and other persons in their household. This information is directly related to the childcare benefits that the Member applies and should be accurate so that the processing of benefits application can be done smoothly. GAP may require additional documentation such as a tax return when the information is key to a decision such as childcare eligibility. When an organization Providers designates an employee to complete the documents, the employee may provide business contact information of another employee and this information should be accurate so that the payments can be processed properly. These individuals should be aware that they represent the company, and their name and business contact information will be shared accordingly.
9-4	If any collections of PII into the system are subject to the Paperwork Reduction Act (PRA), identify the Office of Management and Budget (OMB) Control Number for the collection. If the system does not implicate the PRA, write <u>Not Applicable</u>.
	The OMB Control Number is 3045–0142, its expiration date is 03/31/2025.
9-5	If any collections of PII into the system are subject to an agreement, describe those agreements. If no agreements are relevant, write <u>Not Applicable</u>.
	Not Applicable; ACB does not link to any other systems.

10- SYSTEM ACCESS	

10-1	Separately describe each category of individuals who can access the system along with:
	    a. What PII they can access (all or what subset).
	    b. Why they need that level of access.
	    c. How they would request and receive that access.

	d. How their access is reduced or eliminated when no longer necessary.
	ACB is supported by a team of GAP employees and contractors providing differing roles within the environment. The level and type of access is based on the role of the user and all users comply with the CNCS rules of privacy. For example: • the Project Manager, Lead Child Care Coordinator, and two Child Care Coordinators have read/write access to ACB and program documents that include PII • the IT Administrator has read/write access to all ACB system and application data to include PII • the System Security Officer/System Privacy Officer and developer do not have access to the ACB production system or any PII about Members or Providers (i.e., no access to PII). GAP manages all user accounts through the ACB Change Configuration Control Policy and Procedure. All access requests must be reviewed and approved by the ACB Change Control Board (CCB) before they are made by the IT Administrator. When anyone leaves the project, the notification is submitted and tracked via the CCB process, the account is disabled on the off-boarding date, and all IT equipment which may contain PII is collected. The full suite of policies and procedures are reviewed, approved, and maintained by the AmeriCorps Cybersecurity Team. AmeriCorps staff do not have direct access to ACB.

11- PII SHARING	

11-1	**Separately describe each entity that receives PII from the system and:**
	    a. What PII is shared.
	    b. Why PII is shared.
	    c. How the PII is shared (what means/medium).
	    d. The privacy controls to protect the PII while in transit.
	    e. The privacy controls to protect the PII once received.
	    f. Any agreements controlling that PII.
	If PII is not shared outside the system, write <u>Not Applicable</u>.

	Each year, GAP sends to the IRS the name of each Provider, their Tax ID or SSN, and the amount GAP paid them that year. The IRS uses this information to confirm that the Provider paid taxes on those earnings. GAP may share PII from ACB with the AmeriCorps staff who are responsible for overseeing the childcare program. When the contract with GAP ends, those AmeriCorps staff will receive all information stored in ACB. This information is provided to AmeriCorps via a secure connection.

12- PRIVACY ACT REQUIREMENTS

12-1	**If the system creates one or more systems of records under the Privacy Act of 1974:**
	    a. **Describe the retrieval that creates each system of records.**
	    b. **State which authorities authorize each system of records.**
	    c. **State which system of records notices (SORN) applies to each system of records.**
	If the system does not create a system of records, write <u>Not Applicable</u>.

The Childcare Coordinators and Managers search for Members using the names and email addresses of the Members.

The legal authorities authorizing this system of records include:
- The National and Community Service Act of 1990 as amended (42 USC 12501 et seq.)
- The Domestic Volunteer Service Act of 1973 as amended (42 USC 4950 et seq.)
- E.O. 9397 as amended - Numbering System for Federal Accounts Relating to Individual Persons

Childcare benefits may not exceed applicable payment rates as established in the state in which the childcare is provided under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858c(4)(A)).

The SORN that applies to the records in ACB is *CNCS-06-CPO-ACB - AmeriCorps Child Care Benefit System (ACB).* A Privacy Act Statement, developed from the SORN, is provided to Members when they provide information captured in ACB:

> *Authorities – This information is requested pursuant to the National and Community Service Act of 1990 as amended (42 USC 12501 et seq.), the Domestic Volunteer Service Act of 1973 as amended (42 USC 4950 et seq.), and E.O. 9397 as amended.*
> *Purposes – It is requested to manage, administer, and evaluate the childcare benefits program offered to eligible AmeriCorps Service Members.*
> *Routine Uses – Routine uses of this information may include disclosure to (1) contractors to assist with administering the childcare benefit, (2) individuals and organizations providing childcare, and (3) federal, state, or local agencies pursuant to lawfully authorized requests.*
> *Effects of Nondisclosure – This request is voluntary, but not providing the information will likely affect your ability to receive childcare benefits.*

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13- SAFEGUARDS	
13-1	**Describe the technical, physical, and administrative safeguards that protect the PII in the system.**
	The ACB system is safeguarded by multiple layers of controls to ensure the security and confidentiality of the PII collected through ACB. GAP Solutions follows AmeriCorps Childcare Benefits Policies, Procedures and authorization and issues GAP policies and procedures accordingly to ensure its employees receive required trainings and sign-off on the Rules of Behavior before they are authorized to access and perform works on ACB. From controls implemented via the FeRAMP Authorized Infrastructure as a Service (IaaS) to the GAP headquarter where the program is administered, all data is stored on hardened servers that are scanned and patched to ensure maintenance and implementation of all security and privacy controls. In addition, all access to ACB and the associated PII is via encrypted tunnels that use AES-256 encryption and enforce mandatory access control (MAC). All computers used in the operation of ACB have full disk encryption implemented. Notices are also posted on the ACB website advising the individuals to securely upload their application documents and encrypt their emails. ACB performs logging at multiple layers; the logs identify all sources, destination IP addresses, and ports used. The system also performs system level logging that captures the user and computer name along with details of the event. These logs are monitored by the GAP ACB IT Support team and action is taken as appropriate. No PII from ACB is permitted to be saved to removable media. Attendance sheets that include the name and age of the child are printed and stored in a controlled facility that only the authorized GAP personnel have access to. Roles that have oversight and responsibility to ensure the proper use of the PII within the ACB program and system are assigned, which include the Child Care Coordinators who are responsible for the daily operations of the ACB program and system and safeguarding PII throughout the process, the Child Care Program Manager who is responsible for the oversight of the Child Care Coordinators, and the Information System Security Officer/System Privacy Officer who is responsible for the overall program and system handling of PII data. All these individuals must sign an AmeriCorps Privileged User Rules of Behavior and receive privacy and security training annually which is documented as a performance metric monitored by AmeriCorps to ensure adequate information security and privacy compliance posture,

14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
14-1	**Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.**
	All PII within the system is current. Childcare Coordinators work with Members and Providers daily, to update and/or correct information in the

		system as part of the application submission, evaluation, and maintenance processes based on paper records (W-2, Tax Records, etc.) which are all also stored in electronic format at the Secured Data Center. This ensures the PII is accurate, and complete. ACB only collects PII that is relevant and required for processing the Childcare benefits. All Members and Providers must reapply every year if they want to participate in the program, which provides an opportunity for them to update any outdated information.
14-2		**Describe how an individual could view, correct, update, or ask to amend their PII.**
		Members and Providers can update their PII at any time; the helpdesk will address questions and/or help/facilitate the entry of data if the Members or Providers are having difficulty updating/entering their information through the website. GAP provides each Provider an IRS 1099 tax form which shows what GAP reported to the IRS about that Provider. The providers can correct, update or ask to amend the information they provide if they find any discrepancy.
14-3		**Describe how an individual could control what PII about themselves is included in the system or how it is used. Also describe how those decisions could affect the individual.**
		Members and Providers do not have the option to provide only some of the PII or limit usage of their PII once included in the system. If they do not provide necessary information, then their application to receive or provide childcare cannot be reviewed and is closed.

15- DATA RETENTION AND DESTRUCTION		
15-1		**Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.**
		Due to the business needs, AmeriCorps is working to assign retention schedules to the records in ACB system. These details have yet to be determined.

16- SOCIAL SECURITY NUMBERS (SSNs)		

16-1		**If the system collects truncated or full social security numbers (SSNs):**
		    a. **Explain why the SSNs are required.**
		    b. **Provide the legal authority for the usage of the SSNs.**
		    c. **Describe any plans to reduce the number of SSNs.**
		If the system does not collect any part of an SSN, write <u>Not Applicable</u>.

		The IRS requires GAP to collect and provide the Tax ID associated with every Provider who receives payment. Some Providers use their SSN as their Tax ID.

| | The documents which may be collected from Members, their spouses, and individuals within their household to confirm a member's eligibility may also include SSNs (e.g., tax documents and business documents). The official documents such as the IRS tax forms and instructions appropriately provide Privacy Act Notice of its PII collection and handling activities.

AmeriCorps only collects and uses SSN for the purposes as identified above. AmeriCorps creates alternative members ID to be used in daily operations. |

17- WEBSITES	
17-1	**If the system includes a website which is available to individuals apart from AmeriCorps personnel and contractors, discuss how it meets all AmeriCorps and Federal privacy requirements. If the system does not include a website, write <u>Not Applicable</u>.**
	The ACB website uses what is known as a Java session cookie. This session cookie is only valid while the session is valid and only contains the Java session identifier and no other information. It does not use any cookies that stores anything about AmeriCorps program, data, logic, or otherwise beyond the session cookie. The website includes a privacy statement located at: https://americorpschildcare.com/index.cfm?tab7. A link is in the footer of every page of the website.

18- OTHER PRIVACY RISKS	
18-1	**Discuss any other system privacy risks or write <u>Not Applicable</u>.**
	Not Applicable