



## AmeriCorps Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information technology (IT) system:	AmeriCorps Online Ordering System
1-2	System Identifier (3 letter identifier):	OOS
1-3	Unique Investment Identifier (Exhibit 53):	485-000000017
1-4	Office or entity that owns the system:	AmeriCorps Office of Government Relations and Strategic Engagement (GRSE)
1-5	Office or entity that manages the system:	ITCON Services.
1-6	State if the system is operational or provide the expected launch date:	Operational
1-7	System's security categorization:	Low
1-8	Date of most recent Security Assessment and Authorization (SA&A) or why one is not required:	11/01/2021
1-9	Approximate number of individuals with personally identifiable information (PII) in the system:	OOS currently contains PII of approximately 9030 individuals.

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)		
	Role	*Electronic Signature & Date*
3-1	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:	



250 E Street SW  
 Washington, D.C. 20525  
 202-606-5000/ 800-942-2677



4- PIA HISTORY	
4-1	<b>State whether this is the first PIA for the system or an update to a signed PIA.</b>
	This is the first PIA for this system.
4-2	<b>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>.</b>
	Not applicable.

5- SYSTEM PURPOSE	
5-1	<b>Describe the purpose of the system.</b>
	<p>The AmeriCorps Online Ordering System (OOS) is a self-contained web application of high availability, hosted in FedRAMP approved Microsoft Azure Cloud environment. AmeriCorps uses OOS (<a href="http://promote.americorps.gov/">promote.americorps.gov/</a>) to distribute free-of-charge promotional products within AmeriCorps branding such as shirts, envelopes, bookmarks, and stationary. Anyone can access the publicly available webpages of OOS to view and order products from AmeriCorps, and the members of AmeriCorps' VISTA service program can access OOS's restricted webpages to order VISTA exclusive products.</p> <p>OOS runs on Drupal content management system within Microsoft Azure Government Cloud and is managed by ITCON Services. AmeriCorps procures the service from ITCON Services to provide system and database administration to OOS. AmeriCorps is responsible for web content management and product shipment. The staff member of AmeriCorps can access restricted webpages to review, approve, and manage orders. The staff of OOS service provider can access restricted webpages to maintain the system or fulfill the orders.</p>

6- INVENTORY OF PII	
6-1	<b>Provide a list of all the PII included in the system.</b>
	OSS collects names, shipping addresses, emails, phone numbers, United Parcel Service (UPS) shipping accounts and OOS user account credential information.

7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM	
7-1	<b>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</b>



	<p>OOS maintains PII of these individuals who ordered a product or had a product shipped to them. They may be AmeriCorps staff, service members, alumni, grantees, other individuals connected to AmeriCorps, and members of the public. For example, VISTA Members may use the system to order VISTA-branded clothing, teachers may use the system to order stickers for their students, and alumni may use the system to request brochures to recruit new Service Members.</p> <p>Currently, the system maintains the PII of approximately 165 current AmeriCorps staff members, 951 current and recent VISTA Service Members (VISTA Members), and 7909 additional individuals who ordered a product using the system or had a product shipped to them. It also stores privileged system user information of five vendor staff who maintain the system or fulfill the orders.</p> <p>The data collection is minimized and necessary to meet the needs of the organization and the customers. OOS maintains a list of carefully identified PII about all current VISTA Members in order to determine who should access the <u>VISTA Members Only</u> webpages. The majority of these individuals place at least one order during their service and are therefore counted in the 9000 individuals above.</p>
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## 8- INFORMATION IN THE SYSTEM

<b>8-1</b>	<p><b>For each category of individuals discussed above:</b></p> <ol style="list-style-type: none"> <li><b>a. Describe the information (not just PII) collected about that category.</b></li> <li><b>b. Give specific details about any PII that is collected.</b></li> <li><b>c. Describe how the information is used.</b></li> </ol>
	<p>Any individual who wants to place an order yet does not have an account must first select the products they want to order, then create a username and password to set up an account, provide the address where the products should be shipped to, and provide their name, email address, and phone number to complete the purchase order. If they want the order to be shipped to a business address, they may provide the name of that business. If they request expediting shipment, they must provide their UPS shipping account and required date. If they order certain products of a certain quantity, they are asked to justify why they need those products. If they already had an account, the process is the same except they would login using their username and password, their previously used name and contact information would automatically populate, and they would adjust that as needed.</p> <p>AmeriCorps staff can order products on behalf of others. In that situation, they may provide their information, plus the recipient's email, shipping address, and business name.</p>



	<p>If the requested products are in stock and AmeriCorps approves the order, the individual receives an email confirmation and the products are shipped. If there are fulfillment limits, shipping challenges, or insufficient justification, AmeriCorps staff can use the system to reduce or cancel the order and inform the individual why that occurred. Any response from the individual would be provided outside the system.</p> <p>AmeriCorps regularly uploads to update a file in the system which contains the first name, last name, and email address of all current VISTA Members. If a VISTA Member creates an account with the same information as in the file, the system will grant them access to the <i>VISTA Members Only</i> webpages where they can order their VISTA uniform and other products. Soon after individuals leave their VISTA service, their PII is deleted from the file, and they lose their access to the restricted webpages.</p> <p>An audit log captures when individuals access the system and any changes to their information, which includes a copy of all new and old shipping addresses and contact information.</p>
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9- COLLECTIONS OF PII INTO THE SYSTEM	
<b>9-1</b>	<p><b>Describe for each source of PII in the system:</b></p> <ol style="list-style-type: none"> <li>a. <b>The source.</b></li> <li>b. <b>What PII comes from that source.</b></li> <li>c. <b>How the PII enters the system.</b></li> </ol> <p>OSS is designed to allow individuals to place their own order and enter their own PII. However, there are two situations where some of the PII is not directly entered by the individuals:</p> <ol style="list-style-type: none"> <li>1) AmeriCorps staff may place an order for the individuals upon their request. In that situation, the individual may provide AmeriCorps staff members with their information, plus the recipient’s email, shipping address, and business name. The information is then entered into the system by AmeriCorps staff members.</li> <li>2) AmeriCorps regularly uploads to update a file in the system which contains the first name, last name, and email address of all current VISTA Members. The file is uploaded into the system for the current VISTA Members to access VISTA Member Only website.</li> </ol>
<b>9-2</b>	<p><b>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>.</b></p>



	<p>The webforms on OOS website clearly identify each element of PII with separate boxes. The PII is limited to information needed to ship an order to an individual or contact the individual if there are any limits or challenges. The information is collected through a secure connection that encrypts the PII in transit. In addition, the footer of every OOS webpage available to the public includes a link to AmeriCorps' privacy program webpage that informs the individual of the privacy practice of AmeriCorps. A Privacy Act Statement, developed from a draft AmeriCorps system of record notice, is also provided to notify the users of the PII collection activities of OOS so that the users can choose to either consent to the PII collection or not to proceed further with the order.</p>
<p><b>9-3</b></p>	<p><b>If PII about an individual comes from a source other than the individual, describe:</b></p> <ul style="list-style-type: none"> <li><b>a. Why the PII is collected from the secondary source.</b></li> <li><b>b. Why the PII from the secondary source is sufficiently accurate.</b></li> <li><b>c. If/how the individual is aware that the secondary source will provide their PII.</b></li> </ul> <p><b>If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.</b></p> <p>Individuals have the option to entrust and authorize AmeriCorps staff member to order products on their behalf. To do so, a current email address and shipping address of the individual is provided to the AmeriCorps staff member. This information must be current, complete and accurate so that the order can be successfully delivered to the individual as the direct recipient. AmeriCorps staff member will then enter this information into the system and place the order.</p>
<p><b>9-4</b></p>	<p><b>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>.</b></p> <p>Not applicable; an OMB Control Number is not required for this system.</p>
<p><b>9-5</b></p>	<p><b>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>.</b></p> <p>Not applicable.</p>



10- SYSTEM ACCESS	
<b>10-1</b>	<p><b>Separately describe each category of individuals who can access the system along with:</b></p> <ol style="list-style-type: none"> <li><b>a. What PII they can access (all or what subset).</b></li> <li><b>b. Why they need that level of access.</b></li> <li><b>c. How they would request and receive that access.</b></li> <li><b>d. How their access is reduced or eliminated when no longer necessary.</b></li> </ol>
	<p>Individuals who have accounts with OOS can access their own PII in their accounts. If an individual accesses OOS and orders a product, the PII except for the username and password of the individual can be viewed by a limited number of (1) AmeriCorps staff who review orders and help manage the inventory and (2) vendor staff who manage the system or fulfill the orders. AmeriCorps can disable the account of any AmeriCorps employee who no longer requires access to OOS and the vendor can disable the OOS account of any vendor employee who no longer requires access.</p>

11- PII SHARING	
<b>11-1</b>	<p><b>Separately describe each entity that receives PII from the system and:</b></p> <ol style="list-style-type: none"> <li><b>a. What PII is shared.</b></li> <li><b>b. Why PII is shared.</b></li> <li><b>c. How the PII is shared (what means/medium).</b></li> <li><b>d. The privacy controls to protect the PII while in transit.</b></li> <li><b>e. The privacy controls to protect the PII once received.</b></li> <li><b>f. Any agreements controlling that PII.</b></li> </ol> <p><b>If PII is not shared outside the system, write <u>Not Applicable</u>.</b></p>
	<p>The PII collected through OOS is not shared with, or exported to, another system. Shipment labels are attached to the mail package for the delivery service provider to use.</p>

12- PRIVACY ACT REQUIREMENTS	
<b>12-1</b>	<p><b>If the system creates one or more systems of records under the Privacy Act of 1974:</b></p> <ol style="list-style-type: none"> <li><b>a. Describe the retrieval that creates each system of records.</b></li> <li><b>b. State which authorities authorize each system of records.</b></li> <li><b>c. State which system of records notices (SORN) applies to each system of records.</b></li> </ol> <p><b>If the system does not create a system of records, write <u>Not Applicable</u>.</b></p>



	<p>OOS gives AmeriCorps and vendor staff the ability to search for orders by the email address of the individual who placed the order. AmeriCorps uses this feature to compare an individual’s orders over time and determine if they are requesting an unreasonable number of products.</p> <p>Authorities authorizing this system of records include the National and Community Service Act of 1990 as amended (42 USC 12501 et seq.) and the Domestic Volunteer Service Act of 1973 as amended (42 USC 4950 et seq.).</p> <p>The SORN that will apply to the records in this system is currently being drafted. A Privacy Act Statement, developed from the draft SORN, is provided to individuals before their personal information is collected into this system:</p> <p><i>We are required by the Privacy Act of 1974 (5 U.S.C. § 552a) to tell you what personal information we collect and how it will be used:</i></p> <p><b>Authorities</b> – <i>This information is requested pursuant to the National and Community Service Act of 1990 as amended (42 USC 12501 et seq.) and the Domestic Volunteer Service Act of 1973 as amended (42 USC 4950 et seq.).</i></p> <p><b>Purposes</b> – <i>AmeriCorps requests your user name, email address, phone number and address to manage and fulfill your order in the AmeriCorps Online Ordering System.</i></p> <p><b>Routine Uses</b> – <i>Routine uses of this information may include disclosure to the contractors who support the AmeriCorps Online Ordering System.</i></p> <p><b>Effects of Nondisclosure</b> – <i>This request for information is voluntary, but necessary to fulfill your order.</i></p> <p><b>Additional Information</b> – <i>The applicable system of records notice is [Social Network and Public Engagement –pending publication)].</i></p>
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<b>13- SAFEGUARDS</b>	
<b>13-1</b>	<p><b>Describe the technical, physical, and administrative safeguards that protect the PII in the system.</b></p> <p>OOS is hosted in the Microsoft Azure Government cloud which currently maintains a FedRAMP Provisional Authority to Operate at the Moderate Impact Level. OOS’s overall system security at the cloud level is provided by the Azure cloud. Via the continuous monitoring mechanism, AmeriCorps ensures all the system specific controls are properly implemented and the vendors are in compliance with the contractual requirements. The safeguards which have been implemented and are specific to this system include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Not storing PII on any removable media</li> <li>• Encrypting all PII in transit and at rest</li> <li>• Controlling all user access via a username and password</li> </ul>



	<ul style="list-style-type: none"> <li>• Only individuals with administrator access can modify other user accounts</li> <li>• Regular system backups and</li> <li>• The automatic creation of audit logs.</li> </ul> <p>OOS has internal access control policy, procedure and process in place and has created the OOS User Management process that meets the Audit and Accountability policy. For external and general users, their accounts will be blocked if it remains inactive for 365 days and the report is generated and reviewed regularly.</p> <p>To ensure transparency and minimize potential privacy risks, AmeriCorps posts Privacy Act Statement on the login page of OOS and provides the users of OOS with choice and consent options that the users can choose to either provide PII so as to proceed further with the order or not to continue. The OOS website also has links to the privacy policy of AmeriCorp, which provides details about the privacy practice of AmeriCorps. AmeriCorps develops system of record notice that covers OOS and conduct this Privacy Impact Assessment as a means to appropriately notify the public of the data collection and data handling activities of OOS, the relevant routine uses and purpose, the privacy rights of the individuals protected by the Privacy Act of 1974 as amended and how their data privacy is safeguarded.</p> <p>In addition, AmeriCorps requires that all AmeriCorps and vendor staff members who operate the system must take annual security and privacy training and agree to follow the AmeriCorps Rules of Behavior and policies, to ensure that they have sufficient knowledge about the privacy and cybersecurity compliance requirement, and maintain good information security and privacy compliance posture.</p>
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14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
<b>14-1</b>	<p><b>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.</b></p> <p>The PII of most of the accounts are provided by the individual and the rest is entered into the system by AmeriCorps staff on behalf of the individual upon request. The webforms provide a separate box for each element of PII and clearly indicates what should be provided in each box. Individuals can correct or update their name and contact information when they complete a new order; the inability to change their PII at other times is not a concern because it is only needed to fulfill an order.</p>
<b>14-2</b>	<p><b>Describe how an individual could view, correct, update, or ask to amend their PII.</b></p> <p>All individuals can correct or update their name and contact information whenever they complete an order. If they have any challenges involving an order or their PII, one or</p>





	more “Contact Us” links towards the top of each screen will send the individual to the <a href="#">National Service Hotline page</a> that explains how to request help via phone, live chat, or a message.
<b>14-3</b>	<b>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.</b>
	An individual could decline to order from the system or limit the sensitivity of their PII in the system by providing their business contact information. When they ask AmeriCorps staff members to place an order on their behalf, they could also ask the AmeriCorps staff member to use their business contact information to complete the order.

## 15- DATA RETENTION AND DESTRUCTION

<b>15-1</b>	<b>Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.</b>
	AmeriCorps is working to assign a NARA retention schedule to these records. On an annual basis, AmeriCorps deletes the account of everyone who ordered a product and has not returned to the system in over a year. However, a copy of all information collected into the system will remain in the audit log until a disposition schedule has been established.

## 16- SOCIAL SECURITY NUMBERS (SSNs)

<b>16-1</b>	<b>If the system collects truncated or full social security numbers (SSNs):</b>
	<ul style="list-style-type: none"> <li>a. Explain why the SSNs are required.</li> <li>b. Provide the legal authority for the usage of the SSNs.</li> <li>c. Describe any plans to reduce the number of SSNs.</li> </ul>
	<b>If the system does not collect any part of an SSN, write <u>Not Applicable</u>.</b>
	Not Applicable; none of the online forms request or imply that someone should provide their SSN.

## 17- WEBSITES

<b>17-1</b>	<b>If the system includes a website which is available to individuals separate 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>.</b>
	The website includes a footer that links to the AmeriCorps <a href="#">Privacy Program</a> web page.



	The system does not use web measurement and customization technologies apart from temporary cookies.
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## 18- OTHER PRIVACY RISKS

<b>18-1</b>	<b>Discuss any other system privacy risks or write <u>Not Applicable</u>.</b>
	Not Applicable.