PRIVACY IMPACT ASSESSMENT	
Name of Information System or IT Project:	AmeriCorps Childcare Benefit System (ACBS)
Unique Investment Identifier (Exhibit 53):	485-000000020
System Identifier (3 letter identifier):	ACB
Date:(date the assessment was completed)	May 16, 2016
Indicate whether this PIA is for a new system or for an existing system:	Existing System
Purpose of Information System or IT Project:(include if the system is a major application, minor application, or a general support system)	The AmeriCorps Childcare Benefits System is a major application and 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.
Size of the Information System: (approximate number of users for the system)	500 users
Security Categorization of the System: (e.g. Low, Moderate, High*)*	Moderate

CONTACT INFORMATION	
Person completing PIA: (Name, title, number, email.)	Martin Rathmann, Information System Security Officer (ISSO) 703-964-1570 mrathmann@gapsi.com
Information System Owner: (SSP) (Name, title, number, email.)	Jennifer Veazey. Program Manager , CNCS 202-606-6770 jveazy@cns.com
Information System Security Officer (ISSO): (Name, title, number, email.)	Martin Rathmann, Information System Security Officer (ISSO) 703-964-1570 mrathmann@gapsi.com

REVIEWERS	Signature	Date
Information System Owner Jennifer Veazey	**Original, signed copy on file with the CNCS OIT cybersecurity office.**	5/24/2016
Office of General Counsel Alicia Wilson		
APPROVING OFFICIALS *(Contact CNCS by emailing privacy@cns.gov)*	Signature	Date
Chief Privacy Officer Amy Borgstrom		
Chief Information Security Officer Stacy Dawn		
Senior Agency Official for Privacy Thomas R. Hanley, Jr.		

SYSTEM APPLICATION/GENERAL INFORMATION	
1. **Does this system contain any personally identifiable information (PII) about individuals?** (Any information collected, maintained, or used that is identifiable to the individual. If the answer is "No," mark the rest of this document as "N/A.")	Yes
2. **Provide a link to where a list of all the PII data fields are documented within the system and also describe what PII will be collected or maintained by the system. If a link cannot be provided please provide the information in another form.** (e.g., First, Middle, Last Name; Social Security Number (SSN); Medical and Health Information; Financial Information; Clearance Information; Date of Birth (DOB); Employment Information; Work Address or Phone Number; Criminal History; Home Address or Phone Number)	The following list documents the PII data fields within the system and as appropriate, descriptions of those data fields have been provided: <u>Member Information:</u> First Name, Last Name, Middle Initial Social Security Number Date of Birth (DoB) Program Affiliation Home Phone Number Email Address Current Address Spouse Information: • First Name, Last Name, Middle Initial • Social Security Number • Date of Birth (DoB) • Home Phone Number • Email Address • Current Address <u>Individual Child Care Provider Information:</u> Name Date of Birth (DoB) Email Address Current Mailing Address Address Where Care is Provided Phone Number Provider Rates Disclose: • Name • Tax ID or Social Security Number • License # and Expiration Date The below link is for the system where both members and individual child care providers can access the system: https://www.americorpschildcare.com/Applyonline/
3. **Is this system identified in the CNCS SORN?**	No.
4. **Are any modifications of the SORN needed currently?**	Yes, modifications are needed; updates are forthcoming.

PII IN THE SYSTEM	
5. **What categories of individuals are covered in the system?** (e.g., public, employees, contractors, grantees, and/or volunteers. Members of the public refers to individuals in a non-employee or non-CNCS contractor context. Members of the public includes individuals for whom CNCS maintains information, as required by law, who were previously employed or contracted by CNCS. PIAs affecting members of the public are posted on the CNCS Privacy page of the public-facing website.)	AmeriCorps members and individual child care providers.
6. **Why is the PII being collected?**	PII is being collected to establish a record of the individual identity and verify AmeriCorps member's and childcare provider's eligibility for the benefit.
7. **How will CNCS use the PII collected?** (e.g., SSN are used to track education awards.)	GAP will use all PII collected to validate the Member and Providers identity and establish their ability to participate in the CNCS program and receive the approved child care benefit subsidies.
8. **How will the PII be secured?**	There are multiple layers of controls that will ensure the security and confidentiality of the PII collected through the CNCS Program and System. From physical controls at both the Carpathia hosting facility and GAP Solutions HQ where the program is administered, through the system controls implemented at the network, database and application layers. GAP Solution SharePoint frontend and SQL database backend uses AES-256 encryption and enforces mandatory access control (MAC). The GAP Childcare Coordinators also go through user authentication before accessing the system and are trained on the processes and procedures for protecting PII data. Data is restricted to authorized users with CNCS roles and permissions; these authorized users have received and passed the required MBI Federal background clearance process.
9. **Is information being obtained from the individual directly? If not directly, then what are the other sources?**	Yes, it is collected from the individuals (i.e. AmeriCorps members).
10. **Is the PII current?** (What steps are being taken to ensure the PII is current and that there is not any PII that needs to be deleted? For example, if someone is no longer an employee, their PII is not needed after a certain point.)	All PII within the system is current. Participation in the AmeriCorps Child Care Benefit Program is based on an annual schedule and all data is validated on an annual basis and deleted if the Member or Provider are no longer participating in the AmeriCorps Child Care Benefit Program and data is retained in accordance with the program records retention schedule. Members are directed to complete an update form as required when there is a potential change to any PII.

PII IN THE SYSTEM	
11. What specific authorities authorize this system or project, the associated collection, use, and/or retention of personal information? (A Federal law, Executive Order of the President or CNCS requirement must authorize the collection. i.e., legal authority to collect SSN.)	Sec. 141(e) and 158(d) of the National and Community Service Act of 1990, as amended (Pub. L. No. 101-610, as amended) and this Act generally; Sec. 105 of the Domestic Volunteer Service Act of 1973, as amended (Pub. L. No. 93-113, as amended) and this Act generally.
12. What opportunities do individuals have to decline collection of specific PII/ consent to particular use and/or approve or disapprove of how that information is being shared?	Individuals can decline to provide PII; however if a person does not provide necessary information then the childcare application cannot be reviewed and is closed. If an individual wishes to receive the benefit, they must provide the PII.
13. Are the PII elements described in detail and documented? If so, what document provides description? (e.g., Data Management Plan)	The CNCS Member and Provider applications fully describe all of the PII collected. See question 2 for more information.
14. If the information system is operated at more than one site, how will consistency of the information be ensured at all sites?	CNCS AmeriCorps Child Care Benefit Program is operated out of Gap Solutions Inc. headquarters in Herndon, Virginia. The CNCS servers are located at a central site, the Carpathia Secured Data Center in Herndon, Virginia. The link for the application can be found at: https://www.americorpschildcare.com/Applyonline/

MAINTENANCE AND ADMINISTRATIVE CONTROLS	
15. What are the retention periods of PII in this system? (This should be consistent with the records schedule as approved by the National Archives and Records Administration.)	GAP will retain this information for a period of 5 years.
16. What are the procedures for disposition of the PII at the end of the retention period?	PII is deleted once 5 years from the date that the childcare benefits have ended.

MAINTENANCE AND ADMINISTRATIVE CONTROLS	

17. Does the system generate audit records containing information that establishes the identity of the individual associated with accessing the system's PII for accountability purposes (e.g., implemented audit logging)? If yes, what information is captured regarding users/usage?	The ACBS system performs logging at multiple layers. The logs generated at the network layer, to include all user access to the system is logged via the firewall as part of our managed service from Carpathia, our hosting provider. The logs identify all source, destination IP addresses and Ports used. The network also has an Intrusion Detection System (IDS) that triggers alerts on known security probes, penetration attempts, etc. These logs are monitored by the CNCS team action is taken as appropriate.
	The CNCS system also performs system level logging at the Microsoft Operating System Layer that captures the user and the Computer name along with all the details of the event. The following provides the specific logs that are generated along with the maximum log size before the logs start to be over written. The log file size under normal conditions, captures approximately 30-45 days of logs.
	• Windows Logs
	  o Application logs – (Stores maximum of 20,480kb size of logs before older logs are overwritten)
	  o Security logs - (Stores maximum of 20,480kb size of logs before older logs are overwritten)
	  o Setup logs - (Stores maximum of 1028kb size of logs before older logs are overwritten)
	  o System logs - (Stores maximum of 20,480kb size of logs before older logs are overwritten)
	• Application and Services Logs
	  o Hardware Events - (Stores maximum of 20,480kb size of logs before older logs are overwritten)
	  o Internet Explorer logs-(Stores maximum of 1028kb size of logs before older logs are overwritten)
	  o Key Management Service logs - (Stores maximum of 20,480kb size of logs before older logs are overwritten)
	  o Symantec Endpoint Protection Client logs - (Stores maximum of 8,192kb size of logs before older logs are overwritten)
	  o Windows PowerShell logs - (Stores maximum of 15,360kb size of logs before older logs are overwritten)

18. Will the PII be retrieved using a personal identifier? List the identifiers that will be used to retrieve information and/or create reports.	PII is retrieve by first & last name, address, tax id, or social security number.

MAINTENANCE AND ADMINISTRATIVE CONTROLS	
19. **What controls will be used to prevent unauthorized monitoring or retrieval of PII?**	Only the individual and authorized system users of the ABCS can access PII. Data is restricted to authorized users with ABCS roles and permissions; these authorized users have received and passed the required MBI Federal background clearance process.

ACCESS TO PII	
20. **Who will have access to the PII in the system? What kind of access will they have?** (e.g., contractors, managers, system administrators, developers, or others. Read only access, read and write access, or change. If contractors have access to the PII in the system, provide evidence that assigned contractors are in compliance with CNCS rules on privacy.)	The ACBS system is supported by a team of contractors providing differing roles within the environment. The level and type of access is based on the role of the user and all users are in compliance with the CNCS cybersecurity & privacy rules of behavior. The roles and access are: • Project Manager – Read/Write Access • Lead Child Care Coordinator (CCC) – Read/Write Access • Child Care Coordinator (CCC) – Read/Write Access
21. **What controls are in place to prevent the misuse of PII by those having access and who is responsible for assuring proper use of the PII?** (Please list processes and training materials.)	GAP Childcare coordinators are assigned as authorized systems users and have signed a CNCS security & privacy User Rules of Behavior. The CNCS team undergoes annual PII security training.
22. **Who will the PII be shared with? List other systems that share or have access to the PII. If other systems have access to or share the PII, is there an interconnection agreement in place or written agreement regarding the sharing and how the PII will be protected? How will the PII be used by the other agency and who will be responsible for protecting the privacy rights of the public and employees affected by any interface?**	No other systems will use or have access to PII within the ACBS system.
23. **Will the information be saved to removable media, or printed to hard copy? How will removable media and or hard copies be protected?**	No. PII from ACBS will not be saved to removable media or printed to hard copy. Attendance sheets that include the name and age of the child are printed and stored in a controlled facility that only the authorize GAP personnel have access too. All computers used in the operation of the CNCS program have full disk encryption implemented as detailed in the SSP.