

Corporation for National and Community Service

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Corporation for National and Community Service (CNCS) Privacy Impact Assessment (PIA)

1- GENERAL SYSTEM INFORMATION		
1-1	Name of the information technology (IT) system:	AmeriCorps Child Care Benefit System (ACB)
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:	Department of the Chief of Program Operations Immediate Office
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:	July 2018
1-9	Approximate number of individuals with personally identifiable information (PII) in the system:	<p>Each AmeriCorps Service Member (Member) who applies for child care provides ACB information about themselves, their children (generally one or two), supervisor, spouse, and anyone else who lives in their household. Approximately 2500 Members applied as of 5/2019, and the number is currently increasing by about 500 each year.</p> <p>ACB also maintains information on each Child Care Provider (Provider) who wants to care for a Member's child and receive a reimbursement. Approximately 1,750 Providers applied as of 5/2019, and the number is currently increasing by about 225 each year.</p>

2- CONTACT INFORMATION

3- SIGNATURES (ORIGINAL MAINTAINED BY CHIEF PRIVACY OFFICER)

	Role	*Electronic Signature & Date*
3-1	System Owner:	Signatures on file with Privacy Office
3-2	Office of General Counsel:	
3-3	Chief Privacy Officer:	
3-4	Senior Agency Information Security Officer:	
3-5	Senior Agency Official for Privacy:	

4- PIA HISTORY

4-1	<p>State whether this is the first PIA for the system or an update to a signed PIA.</p> <p>This is an update to an existing system with a prior signed PIA.</p>
4-2	<p>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 Not Applicable.</p> <p>The only major change is that GAP now offers payment to Providers through direct deposit.</p>

5- SYSTEM PURPOSE

5-1	<p>Describe the purpose of the system.</p> <p>CNCS offers child care benefits to AmeriCorps State and National, VISTA, NCCC, and FEMA Corps Members who meet the eligibility requirements. CNCS hired a third-party provider called GAP Solutions, Inc. (GAP) to manage almost all aspects of that program. ACB is the system that GAP selected and uses to manage, administer, and evaluate the child care benefits provided to Members on behalf of CNCS. It is a cloud-based service that CNCS does not access and does not link to any other CNCS systems.</p> <p>ACB includes the AmeriCorps Child Care Benefits Program website located at https://americorpschildcare.com.</p>
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6- INVENTORY OF PII

6-1	<p>Provide a list of all the PII included in the system.</p> <p>The elements of PII in the system include:</p> <ul style="list-style-type: none"> • Name • Gender • Date of birth and age • Home, cellular, and fax number • Email address • Mailing and physical address • National Service Participant ID (NSPID) number • Social Security and Tax ID Number • Child Care License and Business License Number • Driver's License and State ID Number
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	<ul style="list-style-type: none"> • Bank account information
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7- CATEGORIES OF INDIVIDUALS IN THE SYSTEM

7-1	<p>Describe the categories of individuals whose PII is in the system and state approximately how many individuals are in each category.</p> <p>Members participate in AmeriCorps service programs around the country and provide direct service and capacity-building to address critical community needs. Sample activities include tutoring and mentoring youth, providing job placement assistance to unemployed individuals, addressing childhood obesity through in-school and after-school physical activities, and weatherizing and retrofitting housing units for low-income households. Members also mobilize community volunteers and strengthen the capacity of the organizations where they serve.</p> <p>Each AmeriCorps Service Member (Member) who applies for child care provides ACB information about themselves, their children (generally one or two), supervisor, spouse, and anyone else who lives in their household. Approximately 2500 Members applied as of 5/2019, and the number is currently increasing by about 500 each year.</p> <p>ACB also maintains information on each Child Care Provider (Provider) who wants to care for a Member’s child and receive a reimbursement. Approximately 1,750 Providers applied as of 5/2019, and the number is currently increasing by about 225 each year.</p>
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8- INFORMATION IN THE SYSTEM

8-1	<p>For each category of individuals discussed above:</p> <ol style="list-style-type: none"> 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. <p>ACB includes information about Members who voluntarily enroll to receive child care benefits. When a State and National or VISTA Member enrolls or receives child care, ACB may collect the following information about that Member to validate their identity, establish their eligibility to participate, and process the approved subsidies:</p> <ul style="list-style-type: none"> • 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 child care’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: <ul style="list-style-type: none"> ○ 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
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- everyone else in their household’s name, age, gender, and relationship to the Member
- everyone else in their household who is 18 or older’s:
 - 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)) plus either a month worth of paystubs, a description of their current academic pursuits, or whether they are seeking work.

When a NCCC or FEMA Corps Member enrolls or receives child care, 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 child care’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 child care. They only need to provide their spouse’s employment information if a child is living with that spouse because the eligibility requirements are different.

ACB also includes information about Providers who take care of Members’ children and then request payment. 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 (1) current driver’s license or valid state ID and (2) 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
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9- COLLECTIONS OF PII INTO THE SYSTEM

9-1	<p>Describe for each source of PII in the system:</p> <ol style="list-style-type: none"> a. The source. b. What PII comes from that source. c. How the PII enters the system.
	<p>GAP staff use the MyAmeriCorps Member Support Portal (part of the Electronic System for Programs, Agreements & National Service Participants or eSPAN) to verify that each applicant is eligible for child care and to find their NSPID number and copy it into ACB.</p> <p>All other PII in ACB comes from Members and Providers. They can type and upload information directly into ACB, plus 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.</p>
9-2	<p>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>.</p>
	<p>Member and Provider applications fully describe all the PII collected. The AmeriCorps Child Care Program Fact Sheet lists the child care eligibility requirements, which explains why PII is requested beyond just contact and membership information.</p> <p>The website includes a privacy statement located at: https://americorpschildcare.com/index.cfm?tab7. The login page for the website invites all individuals to review that privacy statement before logging in.</p> <p>Members receive a Privacy Act Statement at or before they provide PII collected into ACB. It is located on the contact, login, and registration page of americorpschildcare.com; individuals must see one of these pages before they access the parts of the website that collect their PII. It is also included on all the forms that collect information from Members.</p>
9-3	<p>If PII about an individual comes from a source other than the individual, describe:</p> <ol style="list-style-type: none"> 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. <p>If all PII about an individual comes directly from the individual, write <u>Not Applicable</u>.</p>
	<p>MyAmeriCorps Member Support Portal is part of the CNCS system that tracks all Member information so the NSPID number in that system should be accurate.</p> <p>Members may provide information about their supervisor, their spouse, everyone in their household, and their children. This information should be accurate since it is about close family and household members. When the information is key to a</p>

	<p>decision such as child care eligibility, GAP may require additional documentation such as a tax return.</p> <p>When Providers with employees complete the documents, the employee completing the document may include PII about another employee; this should be accurate since they both work for the same company and the information should be their business contact information. These individuals should be aware that they represent the company and their name and business contact information will be shared accordingly.</p>
9-4	<p>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>.</p> <p>This information collected is subject to OMB Control Number 3045-0142; this is displayed with an expiration date on all documents and electronic collections that collect information into ACB.</p>
9-5	<p>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>.</p> <p>Not Applicable; ACB does not link to any other systems.</p>

10- SYSTEM ACCESS

10-1	<p>Separately describe each category of individuals who can access the system along with:</p> <ol style="list-style-type: none"> What PII they can access (all or what subset). Why they need that level of access. How they would request and receive that access. How their access is reduced or eliminated when no longer necessary. <p>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:</p> <ul style="list-style-type: none"> 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). <p>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 CNCS Cybersecurity Team.</p>
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	CNCS staff do not have direct access to ACB.
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11- PII SHARING

11-1	<p>Separately describe each entity that receives PII from the system and:</p> <ol style="list-style-type: none"> 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. <p>If PII is not shared outside the system, write Not Applicable.</p>
	<p>Each year, GAP sends 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.</p> <p>GAP may share PII from ACB with the CNCS staff who are responsible for overseeing the child care program. When the contract with GAP ends, those CNCS staff will receive all information stored in ACB. This information is provided to CNCS via a secure connection.</p>

12- PRIVACY ACT REQUIREMENTS

12-1	<p>If the system creates one or more systems of records under the Privacy Act of 1974:</p> <ol style="list-style-type: none"> 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. <p>If the system does not create a system of records, write Not Applicable.</p>
	<p>Members can retrieve their own information using their assigned username and password. Child Care Coordinators and Managers search for Members using their names and email addresses.</p> <p>The legal authorities authorizing this system of records include:</p> <ul style="list-style-type: none"> • The National and Community Service Act of 1990 as amended (42 USC 12501 <i>et seq.</i>) • The Domestic Volunteer Service Act of 1973 as amended (42 USC 4950 <i>et seq.</i>) • E.O. 9397 as amended - Numbering System for Federal Accounts Relating to Individual Persons

Child care benefits may not exceed applicable payment rates as established in the state in which the child care 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 child care 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 child care benefit, (2) individuals and organizations providing child care, 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 child care benefits.*

13- SAFEGUARDS

13-1 Describe the technical, physical, and administrative safeguards that protect the PII in the system.

Multiple layers of controls ensure the security and confidentiality of the PII collected through ACB. From controls implemented via the FedRAMP Authorized Infrastructure as a Service (IaaS) to the GAP Solutions Headquarters 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. The procedures, security and privacy, and responsibilities related to gaining access to the system and associated PII is documented in the System Security Plan (SSP) and other associated security documentation.

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 as detailed in the SSP.

ACB forms that are more likely to collect banking information or SSNs include one of the following notices to the individual completing the form:

- *Uploading the documents via the online application and Faxing are the two safest methods of sending documents over to our office. If you decide to email any of your documents, please ensure to encrypt your email before sending. Email Encryption is to protect the content from being read by entities other than the intended recipients. Please make sure not to send us the password within the encrypted email. It is advised that you send a separate email with the password.*

	<ul style="list-style-type: none"> • <i>Uploading the documents via our online application and faxing are the most secure methods of sending documents to our office. If you do decide to email any of your documents, please ensure you encrypt the documents, then send the documents in one email and the password in a separate email. That will help protect your information from any unintended recipients.</i> <p>ACB performs logging at multiple layers; the logs identify all source, destination IP addresses, and ports used. The CNCS system also performs system level logging at the Microsoft Operating System Layer that captures the user and computer name along with details of the event. The following provides the specific logs that are generated:</p> <ul style="list-style-type: none"> • Windows Logs: Application logs, Security logs Setup logs, and System logs • Application and Services Logs: Hardware Events, Internet Explorer logs, • Key Management Service logs, Symantec Endpoint Protection Client logs, and Windows PowerShell logs. <p>These logs are monitored by the GAP ACB IT Support team and action is taken as appropriate.</p> <p>No PII from ACB will 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.</p> <p>The following personnel (by Role) have oversight and responsibility to ensure the proper use of the PII within the ACB program and system:</p> <ul style="list-style-type: none"> • The Child Care Coordinators are responsible for the daily operations of the ACB program and system and safeguarding PII throughout the process. • The Child Care Program Manager is responsible for the oversight of the Child Care Coordinators. • The System Security Officer/System Privacy Officer is responsible for the overall program and system handling of PII data. <p>All these individuals signed a CNCS Privileged User Rules of Behavior and receive annual privacy and security training.</p> <p>If a computer/system is to be decommissioned from use, it will go through a decommissioning process as detailed in the SSP and other associated security documentation.</p> <p>The SSP provides the system roles and the associated Incident Response Plan sets the time period to notify CNCS if there is an unauthorized intrusion.</p>
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14- DATA ACCURACY, ACCESS, AMENDMENT, AND CONTROL	
14-1	<p>Describe the steps taken to ensure PII is sufficiently accurate, relevant, current, and complete.</p> <p>All PII within the system is current. On a daily basis, the Child Care Coordinators work with Members and Providers to update and/or correct information in the system as part of the application submission, evaluation and maintenance processes</p>

	<p>based on paper records (W-2, Tax Records, etc.) which are all also stored in electronic format at Secured Data Center.</p> <p>All Members and Providers must reapply every year they want to participate in the program which provides an opportunity to update any outdated information.</p>
14-2	<p>Describe how an individual could view, correct, update, or ask to amend their PII.</p> <p>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.</p> <p>GAP provides each Provider an IRS 1099 tax form which shows what GAP reported to the IRS about that Provider.</p>
14-3	<p>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.</p> <p>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 child care cannot be reviewed and is closed.</p>

15- DATA RETENTION AND DESTRUCTION	
15-1	<p>Identify the National Archives and Records Administration (NARA) provided retention schedule for the system and provide a summary of that schedule.</p> <p>GAP and CNCS are currently working to develop a records retention and disposal schedule for ACB that will be submitted to NARA for approval. Until it is approved, all records in ACB will be retained and none of them will be disposed. Once it is approved, all records in ACB will be retained and disposed according to that schedule. To ensure that only the correct records are deleted, GAP will require the System Owner, Information Security Officer, and ACB Manager to verify that the correct records are selected for deletion.</p> <p>CNCS's contract with GAP includes language that CNCS has the right to all ACB data if the contract with GAP ends.</p>

16- SOCIAL SECURITY NUMBERS (SSNs)	
16-1	<p>If the system collects truncated or full social security numbers (SSNs):</p> <ol style="list-style-type: none"> Explain why the SSNs are required. Provide the legal authority for the usage of the SSNs. Describe any plans to reduce the number of SSNs. <p>If the system does not collect any part of an SSN, write Not Applicable.</p> <p>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).</p>

17- WEBSITES

17-1 If the system includes a website which is available to individuals apart from CNCS personnel and contractors, discuss how it meets all CNCS and Federal privacy requirements. If the system does not include a website, write **Not Applicable**.

The site 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 the CNCS 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 **Not Applicable**.

Not applicable.