PRIVACY IMPACT ASSESSMENT

ECA Program Management and Outreach System (ECA-PMOS)

1. Contact Information

> **A/GIS Deputy Assistant Secretary**
> Bureau of Administration
> Global Information Services

2. System Information

(a) **Name of system:** Educational and Cultural Affairs Program Management and Outreach System

(b) **Bureau:** ECA

(c) **System acronym:** ECA-PMOS

(d) **iMatrix Asset ID Number:** 2599

(e) **Reason for performing PIA:**

☐ New system

☒ Significant modification to an existing system

☒ To update existing PIA for a triennial security reauthorization

(f) **Explanation of modification (if applicable):** The old client-server is being replaced with web-based applications.

3. General Information

(a) **Does the system have a completed and submitted Security Categorization Form (SCF)?**

☒ Yes

☐ No - Contact IRM/IA at IASolutionCenter@state.gov for assistance.

(b) **What is the security Assessment and Authorization (A&A) status of the system?**

The ECA-PMOS is currently undergoing its initial Assessment and Authorization (A&A) in order to receive an Authorization to Operate (ATO) status. The estimated ATO date is January 2021.

(c) **Describe the purpose of the system:**

The ECA-PMOS is an umbrella business grouping of several systems with varying degrees of privacy information and record subjects. The systems support programs managed by the U.S. Department of State's (DoS) Bureau of Educational and Cultural Affairs (ECA), in particular, those international education and training programs involved with exchange-of-persons between the United States and other countries. ECA-PMOS systems (also referenced as system components) are deployed in ECA, at posts, in private-sector organizations that are DoS partners, and on the internet.

The ECA–PMOS facilitates electronic data transfer and collaboration among all of the partner organizations. It also allows users to track and manage the full life cycle of ECA programs in order to support ECA's public diplomacy goals. The program life cycle includes planning, solicitations, proposals, grants, funding, projects, itineraries, participants, results and outreach to exchange alumni.

The ECA-PMOS includes the following applications.

Academic Exchanges Information System II (AEIS) (IMATRIX # 4515) tracks grantees and their activities for Fulbright and several other academic programs such as Gilman, Humphries, Study of the U.S. etc. It maintains information on participants, organizations and location (US or overseas), and supports inquiries and generates reports for management, Congress and the public. The bulk of information is provided in one annual data call from non-government cooperative organizations. Data are submitted by Cooperative Agencies electronically in batches for the Enterprise Monitor system to load into AEIS.

Alumni Archive (IMATRIX # 665) is a central repository for ECA Alumni data and houses information on alumni of the exchange programs partially or fully funded by the ECA programs from 1970 forward. These consolidated data are used to:
- Re-engage the alumni and offer them new program opportunities
- Determine updated contact information for alumni
- Determine the value of the alumni's exchange on the ECA program

The Alumni Archive application is used to:
- Identify and acquire new sources of Alumni archival records from non-government organizations (NGOs)
- Extract, transform, and load records into the central Alumni database
- Provide a web interface that allows all ECA staff, Posts, commissions, & designated authorities to easily update records and generate reports
- Provide an electronic mechanism for outside data sources to submit alumni records into the Alumni Archive database on a regular reporting basis.

Alumni Affairs Management System (AAMS) (IMATRIX # 5097) assists the Office of Alumni Affairs with managing, tracking, and reporting on alumni outreach activity, funding, and strategy success. Annually, the Office of Alumni Affairs promotes a competition among U.S. Missions for funding of alumni-focused project proposals. The Alumni Affairs Management System collects information related to the annual project proposal competition, stores historical documents, captures the rank order of the proposals after panel, and records other relevant program management information. Additionally, the system provides data for program status reporting, including Mission-specific alumni programs and funding history, as well as country-specific alumni coordination profiles.

Citizen Exchange Resource Center (CERC) (IMATRIX # 167662) is a web-based application initiated by ECA/PE/C. The purpose of the application is to create an online application where Citizens Exchange personnel can upload and manage participant data

for exchange activities and projects, with the added capability of associating and tracking award recipient organizations and funding for each exchange activity. CERC replaced Eureka.

Consolidated Insurance System (COINS) (IMATRIX # 4247) provides an automated web-based enrollment system for the DoS Accident and Sickness Program for Exchanges (ASPE). The Department "self-insures" (provides medical benefits to) participants enrolled in some of the Department's exchange programs. Authorized access is restricted both on OpenNet and the DMZ.

Enterprise Level Visual Interface to SEVIS (ELVIS) (IMATRIX 246680) provides a single interface from ECA to the DHS Student and Exchange Visitor Information System (SEVIS) for consolidating and batch processing resulting in the creation of the Student VISA (DS-2019 form).

IVLP Resource Center (IVRC) (IMATRIX # 1021) is the system used to manage the International Visitor Leadership Program (IVLP). IVRC is used throughout the IVLP project cycle by a variety of stakeholders including posts, the Office of International Visitors (OIV), and external program partners at eight grantee National Program Agencies (NPAs) and over eighty community-based member (CBM) organizations across the United States. IVRC is used to manage every step of the IVLP process, starting with creating projects and nominating participants. OIV uses the IVRC to assign NPAs and participants to projects, manage overall program spending, and oversee project-specific itineraries and budgets. The NPAs and CBMs design itineraries and enter appointment data in the system, including information on hotels, ground transportation, professional resources, and home hospitality hosts. OIV also uses IVRC to evaluate NPAs at the conclusion of a project.

Executive Office Suite (IMATRIX # 1019) is a financial tracking and program management tool supporting users in the ECA Budget, Grants, and Program Management offices. It provides:
- Tracking and reporting of all budgetary and financial transactions - including detailed document tracking and audit trails.
- Workflow queues that monitor and assign work items and track all commitment types and funding transactions through completion.
- Automated tracking of program versus operational plan, reprogramming limits, monitoring of funding and commitments by assigned project numbers, reimbursements, advice of allotments, earmarks, and representational funds.

Business Objects (IMATRIX # is N/A since it is a tool) is a reporting tool for ECA program offices. As such, it pulls information from databases populated by source systems (most of those listed above) and provides the data in automated, canned, and ad-hoc reports to users.

(d) Describe the personally identifiable information (PII) that the system collects, uses, maintains, or disseminates:

There are three distinct levels of PII for applications within the ECA-PMOS: (1) personally identifiable information about U.S. Citizens (non-USG-employees); (2) contact information for USG employees; and (3) information from or about non-U.S. persons.

The first level includes data on U. S. Citizens which are used to build participant profiles. Applications included in this level are listed below.

Academic Exchanges Information System II (AEIS II): Name (Last, First, Second Last, Middle Names; Suffix), Gender, Race, Ethnicity, Date of Birth (D.O.B), Place of Birth (P.O.B.), Citizenship Country (1st, 2nd, 3rd), Marital Status, Spouse's Citizenship Country, Home Address, Home Country, Email Address, Home Phone Number, Home Fax Number, Home Cellular, Number Visa Type, SEVIS Number, Home Institution Name, Home Institution, Host Email Address Host Phone Number, Host Fax Number, Host Cellular Number

Alumni Archive: Name (Prefix; Last, First, Second Last, Middle Names; Suffix), Sex / gender, D.O.B., Deceased Status, Disabled Status, Country of Citizenship, Second Citizenship Country, Home Address, Province and Country Address, Preferred Address, Home Phone, Mobile Phone, Other Phone, Preferred Phone, Fax Number, Email 1, Email 2, Preferred Email,

Citizen Exchange Resource Center (CERC): Name (Last, First, Middle Names; Suffix), Residence Country, Citizenship Country, Home Address, Country Address, Phone, Email, D.O.B, Sex, Disability

Consolidated Insurance System (COINS): Name (Last, First, Second Last, Middle Names; Suffix), Gender, D.O.B., Phone Number, Email Address, Citizenship, Home Address, Province and Country Address, Host Organization Address, Medical Notes (if any)

Enterprise Level Visual Interface to SEVIS (ELVIS): Name (Last, First, Middle Names; Suffix), Residence Country, Citizenship Country, D.O.B., P.O.B. (Country and City), Gender

IVLP Resource Center (IVRC): Name, (Last, First, Middle Names; Suffix) Nickname, Gender, Personal Web address, D.O.B., P.O.B., Citizenship Country, Residence Country, Marital Status, Home Address, Province and Country Address, Phone, Email, Educational Background, Visa Type (if J-1 Visa- SEVIS) or if B1 visa applies

Executive Office Suite (EOS): Name (Last, First, Second Last, Middle Names; Suffix), Familiar Name, Phone Number, Email Address, Home Address, Province and Country Address

Business Objects: Name (Prefix; Last, First, Second Last, Middle Names; Suffix), Nickname, Sex / gender, D.O.B., Deceased Status, Disabled Status, Home Address, Province and Country Address, Preferred Address, Home Phone, Business Phone, Mobile Phone, Other Phone, Preferred Phone, Fax Number , Email 1, Email 2, Preferred Email, Host Email address, Host Phone Number, Host Fax Number, Host Mobile Number, Host Address, Race, Ethnicity, P.O.B. (City and Country), Citizenship Country (1st, 2nd, 3rd), Marital Status, Spouse's Citizenship Country, Visa Type, SEVIS Number, Residence Country, Personal Web Address, Educational Background

The second level of PII collected on U.S. citizens is **solely official contact information of U.S. federal employees**. The ECA-PMOS applications that fall within this category are listed below.

Alumni Affairs Management System: Name, Business Address, Business Phone Number, Business Email

Business Objects: Name (Last, First, Middle); Suffix, Business Address, Business Phone Number, Business Email

The third level of PII is solely collected on non-U.S. citizens. The ECA-PMOS application that falls within this category is **Business Objects** which contains the PII listed above.

(e) **What are the specific legal authorities and/or agreements that allow the information to be collected?**

- 5 U.S.C. 301 (Management of the Department of State);
- 22 U. S. C. 1431 et seq (Smith-Mundt);
- United States Information and Educational Exchange Act of 1948, as amended;
- 22 U.S.C. 2451-58 Fulbright-Hays Mutual Educational and Cultural Exchange Act of 1961, as amended;
- 22 U.S.C. 2651 a (Organization of the Department of State); and
- 22 U. S. C. 3921 (Management of the Foreign Service).

(f) **Is the information searchable by a personal identifier (e.g., name or Social Security number)?**
☒ Yes, provide:
- SORN Name and Number: Educational and Cultural Exchange Program Records.State-08
- SORN publication date (found under the Volume Number and above the Public Notice Number on the published SORN): July 30, 2020

☐ No, explain how the information is retrieved without a personal identifier.

(g) **Does the existing SORN need to be amended to reflect the inclusion of this new or significantly modified system?** ☐ Yes ☒ No

If yes, please notify the Privacy Office at Privacy@state.gov.

(h) Is there a records retention schedule submitted to or approved by the National Archives and Records Administration (NARA) for this system? ☒Yes ☐No
(If uncertain about this question, please contact the Department's Records Officer at records@state.gov .)

If yes provide:
- Schedule number (e.g., (XX-587-XX-XXX)): Please see below – four records retention schedules
- Length of time the information is retained in the system: See below for each schedule
- Type of information retained in the system: See below for each schedule

A-36-005-07a	**Academic Exchange Information System (AEIS2)**
Description:	a. Master File

Content includes detailed information on (1) applicant (name, marital status, citizenship and birth countries, number of accompanying dependents, gender, date of birth, ethnicity, race, naturalization date, title, occupation, address, email, phone, and SEVIS ID); (2) application (grantee institution, grant category, grant country, grant start and end dates, co-op agency); (3) application waiver request (waiver basis, case number); and (4) grant (institution, amount, start and end dates, extension).

Disposition: Temporary. Cut off at end of fiscal year when grant terminates. Destroy/delete 25 years after cut off or when no longer needed, whichever is later.

DispAuthNo: **N1-059-09-31, item 1a**

A-36-016-09a **EUREKA**

Description: a. Master File

Information content includes detailed information on (1) the specific exchange project; (2) the not-for-profit organization sponsoring the project; and (3) the participants, including: participant name, program name, disability status, SEVIS ID Number, country of citizenship, gender, date of birth, place of birth, occupation, marital status, passport number, expiration date, and place of issue, Social Security Number, address, and contact information.

Disposition: Temporary. Cut off at end of fiscal year when grant/cooperative agreement ends. Destroy or delete when 75 years old.

DispAuthNo: **N1-059-09-32, item 1a**

A-36-018-01a   **Exchange Visitor Database-Enhanced (EVDBe)**

Description: a. Master File

Content includes detailed information on (1) the specific IVLP project, including program itinerary and substantive content; (2) the not-for-profit organization administering the project; (3) the volunteer groups assisting with the project; (4) project funding; and (5) the participants, including: participant name, country of citizenship, gender, date of birth, place of birth, occupation, marital status, SEVIS ID number, address and contact information.

Disposition: Temporary. Cut off at end of fiscal year in which project ends. Destroy or delete
when 75 years old.

DispAuthNo: **N1-059-09-33, item 1a**

A-36-019-03   **Alumni Database**

Description: Database of persons who have participated in a program fully or partially funded by the Bureau of Educational and Cultural Affairs (ECA) or predecessor organizations since 1970 for the purpose of coordinating or arranging alumni activities around the world. Records potentially include the following information: name, sex, birth date, death date, citizenship, home and business addresses, and personal contact information about U.S. cities or states visited as part of a program.

Disposition: TEMPORARY: Destroy records no later than 75 years after birth date or earlier, if appropriate.

DispAuthNo: **N1-059-06-01, item 3**

4. Characterization of the Information

    (a) What entities below are the original sources of the information in the system? Please check all that apply.

        ☒ Members of the Public
        ☒ U.S. Government employees/Contractor employees
        ☒ Other (people who are not U.S. Citizens or LPRs)

    (b) If the system contains Social Security Numbers (SSNs), is the collection necessary?
        ☐ Yes   ☒ No   SSNs are not captured in any ECA PMOS system

        - If yes, under what authorization?

    (c) How is the information collected?

        Information in all ECA PMOS applications is collected either via DoS user entry or automated load processes (data import).

        The PII has several sources, including participants, depending on the Exchange Program. All involve either direct collection of information or use of data already collected by or for the U.S. DoS.
        • Data are provided by Public Diplomacy staff at the Embassy, after prior collection from the individuals.
        • Data are collected from individuals by NGOs acting under contract to DoS. NGOs then provide that data to Department of State.

    (d) Where is the information housed?

        ☒ Department-owned equipment
        ☐ FEDRAMP-certified cloud
        ☐ Other Federal agency equipment or cloud
        ☐ Other
        - If you did not select "Department-owned equipment," please specify.

    (e) What process is used to determine if the information is accurate?

        All User Interface (UI) screens and data import loads have validation, such as format checking, to ensure data entry is accurate.

(f) Is the information current? If so, what steps or procedures are taken to ensure it remains current?

ECA offices use the ECA PMOS applications to complete their work on a daily basis. Therefore, for effective job completion, the data must remain current. DoS personnel periodically work with NGOs to ensure data stays current during the lifecycle of the project and/or exchange activity.

(g) Does the system use information from commercial sources? Is the information publicly available?

The system does not use information from commercial sources nor is it publicly available.

(h) Is notice provided to the individual prior to the collection of his or her information?

Yes, all ECA PMOS applications have disclaimers that link to the Department's privacy policy. Notice is provided via a Privacy Act Statement on the applications' landing page through which the information is collected.

(i) Do individuals have the opportunity to decline to provide the information or to consent to particular uses of the information? ☒ Yes ☐ No

- If yes, how do individuals grant consent?

Individuals provide consent by providing their information and accepting a grant from the DoS.

- If no, why are individuals not allowed to provide consent?

(j) How did privacy concerns influence the determination of what information would be collected by the system?

All ECA PMOS applications collect as little personal information as possible, but interfacing systems such as DHS SEVIS and Seven Corners Insurance require particular information to obtain VISAs and insurance respectively.

5. Use of information

(a) What is/are the intended use(s) for the information?

The ECA PMOS applications collect information necessary for the successful execution of a grant or cooperative agreement. Information is used to build a participant profile and is used to obtain the travel documentation for participants as well as medical insurance.

(b) Is the use of the information relevant to the purpose for which the system was designed or for which it is being designed?

Yes, the use of the information is in line with the purpose for which the systems were designed which is to support the execution of grants and cooperative agreements.

(c) Does the system analyze the information stored in it? ☒ Yes ☐ No

If yes:
   (1) What types of methods are used to analyze the information?

      Data Analytics systems such as Business Objects look at demographics of individuals to provide required information to the Assistant Secretary and/or Congress on request.

   (2) Does the analysis result in new information?

      No

   (3) Will the new information be placed in the individual's record? ☐ Yes ☒ No

   (4) With the new information, will the Department be able to make new determinations about the individual that would not have been possible without it? ☐ Yes ☒ No

6. Sharing of Information

(a) With whom will the information be shared internally and/or externally? Please identify the recipients of the information.

No information is shared internally. Information is shared externally with DHS and Seven Corners.

(b) What information will be shared?

Externally – Participant profile is shared with two external systems as follows:
- Seven Corners – The COINS application under the ECA PMOS umbrella sends user information nightly via secure FTP to Seven Corners, an external company that provides insurance for ECA exchange participants. Each user is given access to the Seven Corners portal to view their insurance information as necessary.
- Dept. of Homeland Security (DHS) Student and Exchange Visitor Program (SEVIS) – The ELVIS application under the ECA PMOS umbrella exchanges information with DHS SEVIS

(c) What is the purpose for sharing the information?

The ECA PMOS applications share information so grants/programs can be successfully executed.

(d) The information to be shared is transmitted or disclosed by what methods?

Information sharing with the Seven Corners Insurance system is via Secure File Transfer Protocol (FTP). Information sharing with SEVIS is via a secure Application Programming Interface (API) between the ECA PMOS application ELVIS and DHS SEVIS.

(e) What safeguards are in place for each internal or external sharing arrangement?

There is a Memorandum of Understanding (MOU) in place between the DoS and the Dept. of Homeland Security for the SEVIS interface. There is a contract in place between DoS and Seven Corners for the COINS interface.

(f) What privacy concerns were identified regarding the sharing of the information? How were these concerns addressed?

Privacy concerns include exposure of information. This concern is mitigated since the external interfaces with DHS and Seven Corners are secure interfaces that use Secure File Transfer Protocol (SFTP) that ensures data exchanged are encrypted and protected.

7. Redress and Notification

(a) What procedures allow individuals to gain access to their information?

Pursuant to the Privacy Act, individuals who wish to gain access to or to amend records pertaining to themselves should write to U.S. Department of State; Director, Office of Information Programs and Services; A/GIS/IPS; 2201 C Street NW; Room B–266; Washington, DC 20520. The individual must specify that he or she wishes the Educational and Cultural Affairs Exchange Program Records to be checked. The individual must include full name, current mailing address, date and place of birth, and other information as specified in the Federal Register, Volume 85 Number 147, published on July 30, 2020. This information may also be obtained by filing a request at FOIA.State.gov.

(b) Are procedures in place to allow an individual to correct inaccurate or erroneous information?
☒ Yes   ☐ No
If yes, explain the procedures.

Every project in an ECA PMOS application has an assigned DoS Program Officer (PO) responsible who can update their project and participant information as needed when

notified by the participant and/or the cooperating partner or NGO that DoS is working with. This may occur via email or even in person at the project kickoff meeting but ultimately, the DoS PO can make the update in the corresponding ECA PMOS application.

If no, explain why not.

(c) By what means are individuals notified of the procedures to correct their information?

When an individual agrees to participate in a DoS program, the formal Federal Assistance Awards documentation will serve as notification if information needs to be corrected. Typically, the participant contacts the cooperating partner or NGO that they are working with if any corrections are necessary.

8. Security Controls

(a) How is the information in the system secured?

Information in the ECA PMOS is secured at many levels. First, the ECA PMOS applications are housed in the DoS data center. Second, each ECA PMOS application validates each user for that application before they gain access through either Single Sign On (SSO) usage and Active Directory (OpenNet applications) or authentication via username and password (DMZ applications). Third, even for the limited few that have access, roles limit what each person with access can view in each ECA PMOS application. And fourth, all ECA PMOS applications employ Data at Rest (DAR, see Section 6F above) so data are encrypted even when residing in the database.

(b) Describe the procedures established to limit access to only those individuals who have an "official" need to access the information in their work capacity.

Similar to above in 8(a), each ECA PMOS application has roles and responsibilities assigned to every user that limit the information that can be viewed and only people who have OpenNet accounts can be granted access to ECA PMOS applications. These defined roles include:
1. User - Basic system user who can enter information in the application. Will be restricted by geographic location/region and specific program.
2. Program Officer - ability to review/update data across an entire program and/or geographic location/region.
3. Branch Chief - ability to review/update data across an entire program and/or geographic location region and to approve a program for execution.
4. System Administrator - ability to access the administration module of an application to create/delete accounts, reset passwords (if DMZ) and change/reset roles and responsibilities among other capabilities.

Each of the roles are assigned only after the business owner for that ECA PMOS application individually reviews each request for access.

(c) What monitoring, recording, and auditing safeguards are in place to prevent the misuse of the information?

All ECA PMOS applications record when PII is viewed, and store that information in log files that can be audited to track and prevent misuse. All other safeguards discussed in Section 8(a) above apply here as well.

(d) Explain the privacy training provided to authorized users of the system.

All OpenNet users and therefore potential ECA PMOS applications users must complete mandatory Cybersecurity Awareness training (PS800), which has a privacy component, each year as well as complete Protecting Personally Identifiable Information (PA318) biennially.

(e) Are any security controls, such as encryption, strong authentication procedures, or other controls, in place to make the information unusable to unauthorized users?
☒ Yes   ☐ No
If yes, please explain.

Data at Rest and Single Sign On are two of the many security controls in place to make information unusable to unauthorized users.

(f) How were the security measures above influenced by the type of information collected?

All ECA PMOS applications are classified as 'moderate' according to National Institute of Standards and Technology (NIST) Special Publication 800-53. Beginning with the ECA PMOS application design, software developers on the team attended specific training courses to understand and learn the best ways to design a secure system.

9. Data Access

(a) Who has access to data in the system?

Authorized application users include basic users, System Administrators, Program Officers, and Branch Chief as referenced in section 8(b) as well as database administrators (DBAs).

(b) How is access to data in the system determined?

The manager of the application approves access to the application.

(c) Are procedures, controls or responsibilities regarding access to data in the system documented? ☒ Yes   ☐ No

(d) Will all users have access to all data in the system, or will user access be restricted? Please explain.

Access to data within ECA PMOS application is restricted based on the roles and privileges set in the application for the users. The Program Officers can access data for the programs they manage and the basic users can only access the data related to the projects they manage. System Administrators have access to data in the application logs stored on the servers and database administrator can access all the data in the database.

(e) What controls are in place to prevent the misuse (e.g. unauthorized browsing) of data by users having access to the data?

In addition to the access restrictions discussed in this section that serve to protect privacy and reduce the risk of unauthorized access and disclosure, ECA PMOS applications log whenever an authorized user views or edits PII so there is a record that can be validated if necessary.