PRIVACY IMPACT ASSESSMENT

<u>Virtual Student Federal Service (VSFS)</u>

1. Contact Information

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

2. System Information

(a) **Name of system:** Virtual Student Federal Service
(b) **Bureau:** Information Resource Management
(c) **System acronym:** VSFS
(d) **iMatrix Asset ID Number:** 336197
(e) **Reason for performing PIA:** Click here to enter text.
- ☒ New system
- ☐ Significant modification to an existing system
- ☐ To update existing PIA for a triennial security reauthorization

(f) **Explanation of modification (if applicable):**

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?**

VSFS is currently undergoing assessment and has an estimated authorization date of March 2021.

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

VSFS is an application owned by the Department of State (DoS) and used to advertise internship opportunities for U.S. Citizens who are active college students. VSFS is used by other federal agencies in addition to DoS. Students view internship opportunities posted on VSFS. They then follow instructions listed on the "How to Apply" tab of the VSFS site to apply for their desired internship positions via www.usajobs.gov with a valid user account. After the application period ends, the data are extracted from www.usajobs.gov, scrubbed of any unneeded PII, and entered into the VSFS database. Mentors review student resumes in VSFS to make their selections for available internships.

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

- Student: name, personal e-mail address (.edu or any other email is allowed). Resume information to include home address, personal phone number, as well as personal references and their contact information.
- Mentor (Department of State or other participating agency staff members) business contact information: name and work email address (only .gov, .mil and several other approved government email addresses are allowed)

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

- o 5 U.S.C. § 3111, Acceptance of volunteer 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)): DAA-GRS-2014-0002-0016
- Length of time the information is retained in the system: Destroy 2 years after hiring authority closes but longer retention is authorized if required for business use.
- Type of information retained in the system:
  Documents are administration of special hiring authority programs such as summer, student, intern, and other temporary hiring.

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

- If yes, under what authorization?

(c) **How is the information collected?**

- Students create user accounts on www.usajobs.gov, where the PII mentioned in section 3d is entered. Then, during the VSFS application period, students will apply for VSFS opportunities through www.usajobs.gov. Upon completion of the application period, www.usajobs.gov generates an export of student/application data and shares with VSFS administrators. This data are then imported into VSFS so mentors can begin the selection process.
- During user account registration, participating federal agency users create mentor accounts and enter projects for potential intern positions.

(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.
The information stored in this system will reside on Microsoft Azure Gov Cloud.

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

Accuracy of the information is the responsibility of the student when they are entering their information into www.usajobs.gov, which then feeds the updated and accurate information into VSFS. No further review as to the accuracy of inputted information is done by Department employees.

Mentors are equally responsible for the accuracy of the information they enter into the VSFS system, but are able to update the information in VSFS once entered and logged into the system.

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

The information is only as current as the last time the user entered or modified their information in the source system (i.e. www.usajobs.gov). It is the responsibility of the user (both mentor and student) to keep their information current. However, mentors are able to update their own information once initially entered.

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

No, the information is not collected from commercial sources and is not publicly available.

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

Yes. Notice is provided to students at the time of data collection on www.usajobs.gov. VSFS pulls information directly from USA Jobs, which may include resumes, and is not gathering information directly from the person of record.

Since only business contact information is collected, mentors will receive notice of information collection upon registering with VSFS.

(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?
  For mentors – yes, they can decline to provide their information, however, they will be unable to post their internship opportunities without first registering with VSFS.

- If no, why are individuals not allowed to provide consent?
  For students - no, VSFS does not collect information directly from the person of record. Information is originally obtained at www.usajobs.gov and the opportunity to decline is provided through that system.

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

To limit the collection of PII to the bare minimum, only student information that is necessary to identify/contact them and associate them with the project they applied for is included.

Mentor information is limited to business contact information, which is lower in sensitivity.

5. Use of information

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

        The student PII is used for contact purposes once the student is selected for a project.

        The mentor PII is used for the purpose of creating and administering the mentor's account.

    (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 student PII is used for contact purposes once the student is selected for a project, and the mentor PII is used for creating and administering mentor accounts

    (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?

          (2) Does the analysis result in new information?

          (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.**

        VSFS does not share user information (mentor or student) internally or externally.

    (b) **What information will be shared?**

        VSFS does not share information internally or externally.

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

        VSFS does not share information internally or externally.

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

        VSFS does not share information internally or externally.

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

VSFS does not share information internally or externally.

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

VSFS does not share information internally or externally.

7. Redress and Notification

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

Students are not able to access or view their PII in VSFS. Students need to login to www.usajobs.gov to access their PII. Students may also submit a Privacy Act request for their information via instructions in the SORN: Educational and Cultural Exchange Program Records, STATE-08.

Mentors can access their PII by logging in to VSFS and viewing the information in their profile.

(b) **Are procedures in place to allow an individual to correct inaccurate or erroneous information?**

☐ Yes   ☒ No

If yes, explain the procedures.

If a mentors' information is incorrect in VSFS, they are able to update it when logged-into the application.

If no, explain why not.

For the primary information collected, student's information, there are no procedures to correct the information in VSFS. Students are responsible for the accuracy of their information as referenced in section 4e. VSFS receives the data export from www.usajobs.gov as it is entered by students. If it is inaccurate, then they risk missing communication by mentors if they are selected for an internship. Guidance is given to students through the FAQs section of the VSFS site so they understand the importance of ensuring their contact information is accurate and up-to-date while applying for VSFS internships.

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

VSFS does not collect PII directly from students nor do students have access to their information in VSFS. The FAQ section of VSFS provides students with guidance regarding the importance of data accuracy.

Mentors are notified of their ability to access and modify their own information, through their profile, by way of accepting the user agreement upon registration with VSFS.

8. Security Controls

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

Since VSFS is used by other agencies in addition to DoS, the external agencies are approved through an account management process. Protections in place include a whitelist of approved domains that only approved agencies have (i.e. .gov, .mil, etc.). Once a user has created an account, the user must click on a link in their email to activate their account and log in (two factor authentication). Encryption at rest is implemented at the database level to ensure information is secured.

(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.**

Access to PII in VSFS is limited due to role-based restrictions. VSFS administrators have access to all information in the system due to the variety of support services they provide.

Mentors can only access their own PII and that of students associated with a project they are leading.

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

Audit logs are enabled on VSFS and are reviewed by VSFS administrators on an on-going basis. The Information Systems Security Officer (ISSO) reviews the logs on a weekly basis.

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

All DoS staff are required to take mandatory trainings, which cover privacy. The mandatory courses required are:
    a. PS800 – Cybersecurity Awareness
    b. PA318 – Protecting Personally Identifiable Information
    c. PK217 – Records Management for Everyone

Training is not provided for students outside of the Department of State.

(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.

Yes, security controls such as unique ID and password credentials, two-factor authentication to the VSFS system, logging and monitoring encryption at rest are employed.

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

The security measures employed by VSFS aim to keep the information, which is the minimum PII necessary to carry out our mission, as secure as possible. The security measures applied to protect this information are standard for the level of PII collected for these purposes.

9. Data Access

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

VSFS administrators/support team and federal agency mentors have access to PII listed in section 3d. Administrators have access to data to provide general system support. Mentors have access to student data as it is necessary in order to contact their selected interns for their projects, and to their own data to access the system and make updates.

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

VSFS uses Role-Based Access Control (RBAC) to manage access for each type of user in the system.
- **Mentors** must have a valid federal agency email address in order to register and perform mentor duties. Once a mentor registers they must login with that federal email address and password before they can access any student information in a read-only manner.
- **Administrators** must have a valid state.gov email address and login before they can access special areas of VSFS where they provide general system support.

(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?**

Administrators have access to all data for assisting students and mentors in a support capacity.

Mentors can only access data, outside of their own, for students who apply to projects the mentor created.

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

All users who have access to data are verified through a unique username and password. VSFS has enabled logging and monitoring within the system. Logs are reviewed on a continuous basis by system administrators, and the ISSO reviews them on a weekly basis.