

PRIVACY IMPACT ASSESSMENT

Tracker II

1. Contact Information

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| A/GIS Deputy Assistant Secretary Bureau of Administration Global Information Services |
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2. System Information

- (a) **Date of completion of this PIA:** 7/2022
(b) **Name of system:** Tracker II
(c) **System acronym:** Tracker II
(d) **Bureau:** Educational and Cultural Affairs (ECA)
(e) **iMatrix Asset ID Number:** 5189
(f) **Child systems (if applicable) and iMatrix Asset ID Number:** N/A
(g) **Reason for performing PIA:**
- New system
 - Significant modification to an existing system
 - To update existing PIA for a triennial security reauthorization
- (h) **Explanation of modification (if applicable):** N/A

3. General Information

- (a) **Does the system have a completed and submitted data types document in Xacta?**
 Yes No - Contact IRM/IA at IASolutionCenter@state.gov for assistance.
- (b) **Is this system undergoing an Assessment and Authorization (A&A)?**
 Yes No
- If yes, has the privacy questionnaire in Xacta been completed?
 Yes No
- (c) **Describe the purpose of the system:**

Tracker II is a central data repository for the U.S. Speaker Program managed by the Bureau of Educational and Cultural Affairs. Each year, the U.S. Speaker Program organizes approximately 650 traveling speakers and virtual programs in cooperation with Department of State field posts worldwide. These programs engage foreign professional

audiences both virtually and in-person on topics of strategic importance to the United States.

1. Traveling Speakers - Bringing an expert from the United States to speak to foreign audiences is a compelling way for field posts to support U.S. foreign policy, and to communicate with foreign audiences about American society, institutions, and culture.
2. Virtual Speaker Programs - ECA engages key foreign audiences through live interactive program platforms, including video, web chats and social media.

The Tracker II system stores contact information and biographical data/curriculum vitae on participating and potential U.S. Speakers. It is also a repository for program requests and significant communications with speakers and field posts, as well as evaluations for all traveling and virtual U.S. Speaker programs. The system captures program details and calculates and summarizes costs. It also produces a tasking document that is e-mailed to the grantee organization that is responsible for logistical aspects of program administration (including travel bookings and ticketing, funding disbursement and passport/visa arrangements). Additionally, it provides a business workflow for speaker projects, tracks program status, and monitors funding allocations and expenditures on a field post, regional, and global basis. Finally, the system produces critical statistical reports on programs and budget.

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

The following are elements of PII collected and maintained in Tracker II on individuals who are not U.S. government employees and who are participating as speakers or presenters in the Bureau of Educational and Cultural Affairs U.S. Speaker Program:

- Name of Speaker
- Date of birth
- Place of birth
- Personal email
- Gender
- Address
- Telephone, cell, fax numbers
- Social Security number *
- Passport number *
- Citizenship
- Education
- Medical documentation
- Financial transactions *
- Business email
- Business title
- Business address phone

- Business email

NOTE * - Elements marked with *immediately above indicate PII that is no longer collected for non-U.S. Government employees. However, until such time as those elements are archived to the National Archives and Records Administration (NARA) in accordance with published records requirements, the records from previous years when this information was collected is still maintained in the backend database of Tracker. Those elements can be viewed by users with the following roles: Admin, Division Chief, Resource Manager, Program Officer, Program Coordinator.

The following are elements of PII collected and maintained in Tracker II only for individuals who are U.S. government employees and who are participating as speakers or presenters in the Bureau of Educational and Cultural Affairs (ECA) U.S. Speaker Program:

- Name of Speaker
- Date of birth
- Place of birth
- Gender
- Personal email
- Address
- Telephone, cell, fax numbers
- Social Security number *
- Passport number *
- Citizenship
- Education
- Medical documentation
- Financial transactions *
- Business email
- Business title
- Business address phone
- Business email

NOTE * - Elements marked with * immediately above indicate PII that is no longer collected for U.S. Government employees. However, until such time as those elements are archived to the National Archives and Records Administration (NARA) in accordance with published records requirements, the records from previous years when this information was collected is still maintained in the backend database of Tracker. Those elements can be viewed by users with Admin role but not accessible through the front-end Tracker II system application.

(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. (United States Information and Educational Exchange Act of 1948, as amended; Smith-Mundt Act)
- 22 U.S.C. 2451-58 (Mutual Educational and Cultural Exchange Act of 1961, as amended; Fulbright-Hays Act)
- 22 U.S.C. 2651a (Organization of the Department of State)
- 44 U.S.C. Chapter 35 (Paperwork Reduction Act)
- 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, etc.)?

Yes, provide:

- SORN Name and Number:
STATE-65 Speaker/Specialist Program Records

- SORN publication date (found under the Volume Number and above the Public Notice Number on the published SORN):

December 10, 2009

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 (Consolidate as much as possible):

- Schedule number (e.g., (XX-587-XX-XXX)):
Pending NARA Approval. The scheduling number is not applicable.

- Disposition Authority Number:
A-37-010-03

- Length of time the information is retained in the system:
All Tracker II (electronic) data files are TEMPORARY. For Biography Files - Cut off on the last update date timestamp. Destroy/delete when 50 years old. For all other Files - Cut off at the end of the fiscal year when the project ends.

- Type of information retained in the system:
Biographic data on U.S. Speakers and U.S. Speaker programs data.

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) On what other entities above is PII maintained in the system?

- Members of the Public
- U.S. Government employees/Contractor employees
- Other
- N/A

(c) If the system contains Social Security Numbers (SSNs), is the collection necessary?

- Yes No N/A

- If yes, under what authorization?

NOTE: The U.S. Speaker Program no longer collects SSNs for retention in the Tracker II system. However, until such time that Tracker II electronic records with SSNs are destroyed in accordance with published records requirements, they are still maintained in the backend database but not accessible through the front-end Tracker II system application.

(d) How is the PII collected?

The PII is obtained directly from the record subjects via email, phone or fax by U.S. Speaker Information Form. The Program Officer uses this form information and manually enters the data into the Tracker II system.

(e) 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.

(f) What process is used to determine if the PII is accurate?

Information collected directly from the record subject is presumed to be accurate. It is the record subject's responsibility to provide accurate information. The contact information for an individual is collected from Department of State records and interviews with the subject individual.

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

The information is verified by the relevant ECA directorates and program offices whose forms are manually entered in the tool. Users are responsible for ensuring the accuracy of their data and have access to their own information to make corrections or updates as needed.

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

Information is not obtained from commercial sources. The information may be collected from publicly available information on the internet and through media reports. The U.S. Speaker Program staff use the internet to obtain biographies, read papers, interviews, and articles written by potential speakers, and to look at lectures on YouTube.

(i) How was the minimization of PII in the system considered?

A potential privacy risk involves unauthorized access to a speaker's name, address, date of birth and biographical information. Information collected and maintained is the minimum amount of information necessary to fulfill ECA's statutorily mandated U.S. Speaker Program. The information is required to draft itineraries, plan and program Speaker activities and manage financial accounts.

For non-U.S. government speakers, social security number, passport number and visa number are no longer collected in the system. The U.S. Speaker Program has initiated a new component to administer logistics. Travel and funding disbursement are now administered by the implementing partner World Learning, Inc. under a Cooperative Agreement.

For U.S. Government and non-U.S. Government speakers, social security number, passport number, financial transactions, and visa number are no longer collected in the system; however, these values are still stored for older records. Only certain roles can view these values in the application: Admin, Division Chief, Resource Manager, Program Officer, and Program Coordinator.

5. Use of information

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

The information described in 3(d) is required to draft itineraries, plan and program Speaker activities and manage financial accounts.

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

Yes, the information collected in 3(d) for the system entirely supports the U.S. Speaker Program. The Program staff rely entirely on the Tracker II system to manage speaking programs.

(c) Does the system analyze the PII stored in it? Yes No

If yes:

- (1) What types of methods are used to analyze the PII?
- (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

(d) If the system will use test data, will it include real PII?

Yes No N/A

If yes, please provide additional details.

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

Internal: Information from 3(d) is shared with U.S. Department of State's overseas Posts that request the program and the Bureau of the Comptroller and Global Financial Services' Global Financial Services Center (CGFS/GFSC) for speakers who are U.S. government employees and non-U.S. government employees.

External: Information from 3(d)'s non-USG speakers is shared with World Learning, Inc. and Seven Corners, Inc., implementer of ECA's Accident and Sickness Program for Exchanges (ASPE), which provides health coverage for traveling programs.

(b) What information will be shared?

Internal: Individual's name, biography, travel itinerary and email address data are shared with overseas posts. No passport, visa or social security numbers are shared. Information shared with CGFS/GFSC includes name and social-security number.

External: World Learning is provided the individual's name, address, telephone number, email address and proposed travel itinerary, while Seven Corners, Inc. is provided the Speaker's name and date of birth.

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

Internal: The purpose of sharing the information with overseas Posts and CGFS is to enable them to prepare correspondence including payment vouchers for educational and promotional materials for the speaking event, as well as make the necessary arrangements like travel itineraries, visa documentation, and country and clearance telegrams for the speakers.

External: The information is shared with World Learning to process visas, tickets and payments required by speakers for their overseas travel. Information is shared with Seven Corners, Inc. in order to provide travel accident and sickness insurance during a program.

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

Internal: For U.S. Department of State's overseas Posts that request the Speaker Program, the information is shared via email.

External: Information is shared with World Learning, Inc. and Seven Corners, Inc. via phone calls, emails or faxes.

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

Internal:

By nature of Tracker II being internal to the Department of State, information is shared with Posts and CGFS/GFSC via secure internal Department of State communication channels. PII is encrypted while being transmitted and sent to only individuals with need to know.

When shared within the Department, all information is used in accordance with Tracker II's stated authority and purpose. Risks to privacy are mitigated by granting explicit access only to authorized persons within the Department.

External:

Risks to privacy are mitigated by limited access to and release of personal information on a need-to-know basis to World Learning, Inc. and Seven Corners, Inc. Terms for protecting information are outlined in the grant agreement which outlines rules of behavior in protecting, handling and accessing PII. Also, there is no direct electronic interface between the external vendors and the Tracker II system.

7. Redress and Notification

(a) Is notice provided to the record subject prior to the collection of his or her information?

Pursuant to the Privacy Act, a Privacy Act statement is included on the U.S. Speaker Information Form, completed by U.S. government employees and non-U.S. government employees, and serves as a notice.

(b) Do record subjects have the opportunity to decline to provide the PII or to consent to particular uses of the PII?

Yes No

If yes, how do record subjects grant consent?

Notice is given via the Privacy Act statement in the application. The individual may decline to provide the required information; however, such actions may prevent individuals from participating in the U.S. Speaker Program.

If no, why are record subjects not allowed to provide consent?

(c) What procedures allow record subjects to gain access to their information?

Individuals may contact their respective Program Officer or the Bureau of Educational and Cultural Affairs to ask what is recorded about them. The Department's Privacy Act practices also allow individuals to gain access to their information by contacting the Department's Freedom of Information Act (FOIA) office for copies of the records retained. Details on this process can be found in the covering SORN, State-65.

(d) Are procedures in place to allow a record subject to correct inaccurate or erroneous information?

Yes No

If yes, explain the procedures.

See 7(c) above. Individuals may also contact their respective Program Officer or the Bureau of Educational and Cultural Affairs to ask what is recorded about them and request that information be amended if they believe it to be incorrect.

If no, explain why not.

(e) By what means are record subjects notified of the procedures to correct their information?

During program engagement, Speaker Program staff orally inform the speaker of procedures to correct their information. The speaker is informed from the beginning of communications that the collected information provided about and by the speaker is maintained in Tracker II. The Speaker Program Officers and Coordinators also remind

the speaker to notify the respective Program staff of any changes to that information during the course of the engagement.

Notice is also provided to individuals as part of the Grant Award Letter. Finally, notification of procedures to correct information is provided via System of Records Notice, State-65.

8. Security Controls

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

Information in Tracker II is secured at many levels. First, the Tracker II application and its dependencies are housed in a Department data center. Second, the system validates users 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, access is limited on the need-to-know basis. And fourth, all ECA Tracker II data are encrypted while being transmitted and when residing in the database.

(b) Explain the different roles that have been created to provide access to the system and the PII (e.g., users, managers, developers, contractors, other).

Similar to the above in 8(a) ECA Tracker II has roles and responsibilities assigned to every user that limits the information that can be viewed and only people who have OpenNet accounts can be granted access to ECA Tracker II application. The roles includes the following:

System functional administrators: Determines who in the respective office staff is authorized to access the system on a need-to-know basis. The level of access and capabilities permitted are restricted by the role assigned to each individual user; they can see all PII information mentioned in 3d.

Division Chief, Resource Manager, Program Officer, and Program Coordinator: Can create, view, update, and delete all PII mentioned in 3d.

Read-only users: Can only view all PII mentioned in 3d with the exception of SSN. SSN has been hidden from view for this role.

All authorized staff must comply with the Department of State's general "appropriate use policy for information technology". Rules of behavior and consequences, and system use notifications are in accordance with OMB Circular A-130, Appendix III.

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

Access to data in Tracker II is determined and approved by system functional administrators on a case-by-case basis in consultation with the Director and/or Deputy Director of the U.S. Speaker Program.

(d) How is access to data in the system determined for each role identified above?

System functional administrators: Access is determined by the ECA/EX/IT Division Chief. The level of access needed is based on user role specified in the system access request form.

Division Chief, Resource Manager, Program Officer, Program Coordinator, and Read-only users: Access is determined by the application/system owner. Users must submit an access request to the Customer Support Help Desk via email with a cc: to the system owner. The system owner must approve the request and specify what role the new user should have. The level of access and capabilities permitted is restricted by the role assigned to each individual user. Users with no need to update system records are granted read-only access.

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

Authorized user login identifiers are appended to any system records created or updated, along with the date and time of the record creation or change. This allows administrators to identify the source of any incorrect or incomplete data recorded in the system.

Access control lists, which define who can access the system, and at what privilege level, are regularly reviewed, and inactive accounts are promptly terminated. Additionally, the system audit trails that are automatically generated are analyzed quarterly and reviewed to deter and detect unauthorized uses. (An audit trail provides a record of which particular functions a user performed--or attempted to perform--on an information system.)

(f) Are procedures, controls, or responsibilities regarding access to data in the system documented?

Yes No

(g) Explain the privacy training provided to each role identified in 8(b) that has access to PII other than their own.

The Bureau of Diplomatic Security conducts annual security training, PS800, Cyber Security Awareness, which is required of all Department personnel to retain access to the Department's network. This annual security training has a privacy component. Additionally, all Department employees must take PA318, Protecting Personally Identifiable Information, biennially.