

## 1. Contact Information

**Department of State Privacy Coordinator**

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## 2. System Information

- (a) Date PIA was completed: March 26, 2010
- (b) Name of system: Educational and Cultural Affairs Program Management and Outreach System
- (c) System acronym: ECA-PMOS
- (d) IT Asset Baseline (ITAB) number: 2599
- (e) System description (Briefly describe scope, purpose, and major functions):

The ECA-PMOS is a business umbrella 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 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 Department of State 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.

ECA-PMOS includes the following systems:

**Academic Exchanges Information System II (ITAB # 4515)** tracks grantees and their activities for Fulbright and other academic programs. It maintains information on participants, organizations and location (US or overseas), and supports inquiries and generates reports for management, Congress and the Public.

**Access Microscholarship Program (ITAB # 5098)** supports the same-named program with the purpose to improve English language skills for bright, disadvantaged 14 - 18 year old students worldwide. The specific functions are:

- Manage Access Microscholarship Program proposals from start to finish by providing workflow management for the proposal submission, review and approval process.
- Provide Access Program performance reporting.
- Record Access Program funding expenditures.
- Track activities in support of the Access Program by Posts.

**Alumni Archive (ITAB # 665)** is a central repository for ECA Alumni data, housing information on alumni of the Exchange programs partially or fully funded by the ECA programs from 1970 forward. This consolidated data is used to:

- Re-engage the alumni and offering them new program opportunities
- Determine updated contact information for alumni
- Determine the value of their exchange on the ECA program

The Alumni Archive application is used to:

- Identify and acquire new sources of Alumni archival records from the 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.

**Alumni Affairs Management System (ITAB # 5097)** assists the Office of Alumni Affairs to manage, track, and report 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 will collect information related to the annual project proposal competition, store historical documents, capture the rank order of the proposals after panel, and record other relevant program management information. Additionally, the system will provide data for program status reporting, including Mission-specific alumni programs and funding history, as well as country-specific alumni coordination profiles.

**COINS (ITAB # 4247)** provides an automated web-based enrollment system for the Department of State's 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 internet.

**E-Teacher (ITAB # 5045)** supports the E-Teacher Scholarship Program in its enrollment of teachers of English and teacher trainers from over 60 countries in on-line courses that explore five major areas of the academic specialty of Teaching English as a Foreign Language (TEFL). It supports the E-Teacher Program in nominee submission, review, approval and reporting. E-Teacher automates and secures the following functions:

- Allow Post users to create, update and submit nominees for review to the E-Teacher PMO.
- Allow E-Teacher PMO staff to review nominees made by RELOs and Post users.
- Provide the capability to create and print reports via a web interface and generate nominee lists.
- Allow E-Teacher access for PMO staff, RELOs and Post users at anytime via the Department's OpenNet.

**English Language Fellows (ITAB # 844)** automates Fellow program requests from posts and documents the review and selection of English Language Fellow programs. Post submits proposals for a Fellow Program via the ELF system. The ELF officers in DC and the regional English language officers at Posts review the program proposals and select the best qualified programs. The system notifies the designated Grantee

organization of the status of the programs. That Grantee organization logs into system and reviews the selected proposals in order to find candidates to fulfill the program requirements (latter is outside scope of this system.)

**English Language Specialists (ITAB # 625)** tracks the itinerary and per diem of speakers that are selected by English Language Programs Office. The speakers are paid to travel to other nations in order to foster the teaching of American Language and Civilization at foreign universities and other overseas institutions. The ELS application also collects contact and payment information from each artist via email and a web form.

**Eureka (ITAB # 1020)** captures funding, participant, and organization information on all Citizen Exchanges projects. It tracks exchange projects, itineraries and participants, and enables the program office to generate ad hoc reports. Eureka collects data on participants and support services (such as entry of DS-2019 data) that are critical to the Citizen Exchanges Office. Office staff enters data on program projects. Participant data can also be entered directly -- as part of DHS' SEVIS database -- or captured from other sources such as health-insurance enrollments and direct transfers from grantee institutions.

**Exchange Visitors Database-Enhanced (ITAB # 1017)** was developed to support ECA's International Visitor Program that is administered by the Office of International Visitors. The emphasis of the IV Program is to increase the mutual understanding between nations through communication at the personal and professional levels. The Office develops and coordinates programs for individual visitors or groups of visitors to visit the United States. It tracks all IV projects and participants, program costs by project and participant and program itineraries. It supports visitor nomination, assignments to program agencies and collaboration with program agencies on project design and production of program books. The type of International Visitor Program being administered determines the way in which the various users interact with EVDB-E. A SEVIS module is also included in EVDB-E. Privileged users who are qualified as Responsible Officers by the Department of Homeland Security (DHS) are provided with the capability to batch and transfer (via FTP) participant data to DHS's SEVIS database.

**Exchange Visitor Information System (ITAB # 900)** allows the Office of Exchange Coordination and Designation to track and provide statistical data on past exchange programs and participants in response to inquiries from Congress and under the Freedom of Information Act. The Exchange Visitor Information System provides historical information about the Exchange Visitor J-1 visa program, their sponsor, and the Participant visits to the United States under these programs. In 2004, current information was entered into SEVIS and EVIS was retained for its historical account of exchanges. This is a static system and with no updates to the data.

**Executive Office Suite (ITAB # 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.
- Full lifecycle initiation, funding, and management of ECA grants through PM, budget, and Grants offices with automatic assignment of users and activities tied to specific grant lifecycle phases.
- Integration with grants.gov

**Federal Exchanges Data System (ITAB # 819)** enables the Interagency Working Group on U.S. Government Sponsored International Exchanges and Training (IAWG) that is housed in the Bureau of Educational and Cultural Affairs, to collect, manage, and report data on international exchange programs sponsored throughout the federal government. The system enables the IAWG to meet its Congressional mandates to act as an information clearinghouse and provide an annual inventory of all federally-sponsored international exchange and training activities.

**FSA Eurasia Database (ITAB # 609)** was used to track Newly Independent States academic exchange projects and participants that were funded by the Freedom Support Act, rather than the Fulbright-Hays Act. This is a static system and will shortly be retired.

**IV Upcoming Projects (ITAB # 673)** processes and reports on International Visitor projects and participants. National Program Agencies and Centers for International Visitors use the site as a source of information on future ECA/PE/V programs and to download project, participant, itinerary, travel and program-request data for projects to which they have been assigned. Other State Department offices and selected NGOs and private-sector contacts use the site for purposes of planning and requesting meetings with incoming visitors. Department of State officers can download final itineraries, program schedules and results data for purposes of debriefing returning visitors and for follow-up.

**NPA-CIV (ITAB # 619)** supports communication among the Department of State's Office of International Visitors and the private-sector members of the International Visitor network: Centers for International Visitor, National Program Agencies and the National Council of International Visitors. National Program Agencies use the system to: (a) download project and participant data; (b) search for institutional program contacts (resources) throughout the U.S. and create a national itinerary for each project; (c) edit and upload the results to the Office of International Visitors for review; (d) transfer the data from the Office of International Visitors to participating Centers for International Visitors; and (e) download the final master file from the Office of International Visitors and print national program books. Centers for International Visitors use the same system (configured somewhat differently at installation) to: (a) formulate and transfer proposals to NPAs for participation in upcoming IV projects; (b) download project, participant, itinerary, travel and other data; and other similar tasks including generating reports; (c) create a local appointment schedule for each project; and (d) produce a variety of reports needed for local programming (intake sheets, appointment confirmation letters, hotel reservations, biographic sheets on visitors, the local program book, etc).

**Online Resource Directory (ITAB # 627)** includes searchable profiles of private-sector partner organizations (program agencies, Centers for International Visitors, etc) and a staff directory that can be accessed selectively by program officers and the general public and updated online by program organizations with the login credentials. It provides business contact information for the Centers for International Visitors, National Program Agencies, and Department of State users among the staffs of these organizations. **RDIV Website (ITAB # 5159)** provides a central point-of-access for the Online Resource Directory and the IV Upcoming Projects.

**Post EVDB Web (ITAB # 1021)** provides the capability for Posts to create Contacts, Nominees and Projects for the International Visitors Program. The data is hosted in a central database repository. The goal of the IV Program is to increase the mutual understanding between nations through communication at the personal and professional levels. The IV Program Office develops and coordinates programs for individual visitors and groups to visit the United States. The Post EVDB Web application allows the Posts to nominate visitors to participate on these programs.

**Sevis Lite (ITAB #1016)** allows users to enter/update SEVIS-related data (see below for information about SEVIS), send it via batch transaction to the Department of Homeland Security's SEVIS database, download results to update status and print DS-2019s. Sevis-Lite contains data on "beneficiaries", participants and support services (such as entry of DS-2019 data) that are critical to ECA/PE/C. ECA/PE/C staff enters data on program projects. Participant data can be entered directly - as part of SEVIS - or captured from other sources such as health-insurance enrollments and direct transfers from grantee institutions. Sevis-Lite is a static system and will shortly be retired. The functionality is now incorporated into AEIS II.

**State Alumni (ITAB #617)** supports an online community of alumni of U.S. government-sponsored exchange programs. It provides opportunities for alumni to network with each other, develop their careers, and stay in touch with the Bureau of Educational and Cultural Affairs, thus helping to extend their exchange experience.

In addition, ECA-PMOS references the Department of Homeland Security's SEVIS system though that system is not part of the ECA-PMOS umbrella and there is no persistent link to that system that is described as follows:

The Department of Homeland Security's Student and Exchange Visitor Information System (SEVIS) tracks and monitors schools and programs, students, exchange visitors and their dependents throughout the duration of approved participation within the U.S. education system. SEVIS collects, maintains and provides the information so that only legitimate foreign students or exchange visitors gain entry to the United States. The result is an easily accessible information system that provides timely information to the Department of State, U.S. Customs and Border Protection, U.S. Citizenship and Immigration Services and U. S. Immigration and Customs Enforcement.

(f) Reason for performing PIA:

- New system
- Significant modification to an existing system

To update existing PIA for a triennial security reauthorization

(g) Explanation of modification (if applicable): Not applicable – not a significant modification.

(h) Date of previous PIA (if applicable): June 2007

### 3. Characterization of the Information

The system:

does NOT contain PII. If this is the case, you must only complete Section 13.

does contain PII. If this is the case, you must complete the entire template.

**a. What elements of PII are collected and maintained by the system? What are the sources of the information?**

There are three distinct levels of PII data for systems within 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. Systems included in this level are listed in the table immediately below.

| Sub-system  | PII data element   |
|---|--|
| <b>Academic Information Exchanges System II (AEIS II)</b> | Individual's Name<br>(Last, First, Second Last, Middle Names; Suffix)<br>Title<br>Position/Occupation Type<br>Gender<br>Race<br>Ethnicity<br>Date of Birth<br>Birth City<br>Birth Country<br>Citizenship Country (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> )<br>Date of Naturalization<br>Marital Status<br>Spouse's Citizenship Country<br>Home Street Address<br>Home City Address<br>Home Country<br>Home State, Zip Code and Congressional District<br>Home Email Address |

| Sub-system                   | PII data element  |
|------------------------------|---|
|                              | <p>Home Phone Number<br/> Home Fax Number<br/> Home Cellular Number<br/> Visa Type<br/> SEVIS Number<br/> Home Institution Name<br/> Home Institution Country<br/> Host. Street Address<br/> Host City Address<br/> Host Country Address<br/> Host State, Zip code and Congressional District<br/> Host Email Address<br/> Host Phone Number<br/> Host Fax Number<br/> Host Cellular Number<br/> Major Field of Study<br/> Specializations<br/> Program Start Date<br/> Program End Date</p>  |
| <p><b>Alumni Archive</b></p> | <p>Individual's Name<br/> (Prefix; Last, First, Second Last, Middle Names; Suffix)<br/> Suffix<br/> Sex / gender<br/> Date of Birth<br/> Deceased<br/> Disabled<br/> Country of Citizenship<br/> Second Citizenship Country<br/> Home Street Address<br/> Home City Address<br/> Home State, or Province and Country Address<br/> Home Congressional District<br/> Business Street Address<br/> Business City Address<br/> Business State, or Province and Country Address<br/> Business Country Address<br/> Preferred Address</p> |

| Sub-system                                | PII data element   |
|---|--|
|   | <p>Home Phone<br/> Business Phone<br/> Mobile Phone<br/> Other Phone<br/> Preferred Phone<br/> Fax Number<br/> Email 1<br/> Email 2<br/> Preferred Email<br/> Business Name<br/> Field of Study</p>  |
| <b>COINS</b>                              | <p>Individual's Name<br/> (Last, First, Second Last, Middle Names; Suffix)<br/> Gender<br/> Birth Date<br/> Phone Number<br/> Email Address<br/> Citizenship<br/> Home Street Address<br/> Home City Address<br/> Home State and Zip Code, or<br/> Province and Country Address<br/> Host Organization<br/> Host Organization Address<br/> Medical Notes (If any...)<br/> Accident and Sickness Program coverage inception</p> |
| <b>English Language Specialists (ELS)</b> | <p>Individual's Name<br/> (Last, First, Second Last, Middle Names; Suffix)<br/> Alias<br/> Home Street Address<br/> Home City Address<br/> Home State, or Province and Country Address<br/> Home Email address<br/> Home Fax<br/> Home Phone Numbers<br/> Home Homepage (URL)<br/> Title<br/> Position</p>   |

| Sub-system    | PII data element   |
|---------------|--|
|               | Institution<br>Business Address<br>Business Email<br>Business City<br>Business State<br>Business Country<br>Business Email<br>Business Homepage<br>Gender<br>Fluent Languages<br>Expertise<br>Passport Name<br>Passport Number<br>Passport Issue Date<br>Passport Expiration date<br>Citizen Type<br>Social Security Number<br>Date of Birth<br>Birth City and Country<br>Medical problems<br>Resume<br>Publications<br>References |
| <b>Eureka</b> | Individual's Name<br>(Last, First, Middle Names; Suffix)<br>Nickname<br>Birth Date<br>Birth Country<br>Birth City<br>Birth State<br>Birth Province<br>Citizenship Country<br>Residence Country<br>Naturalization Date<br>Professional Title<br>Organization Affiliations<br>Passport Number<br>Passport Expiration   |

| Sub-system   | PII data element  |
|--|---|
|  | <p>Sex<br/> Marital Status<br/> Disabled / Disabilities<br/> Home Street Address<br/> Home City Address<br/> Home State and Zip Code, or<br/> Province and Country Address<br/> Phone<br/> Email<br/> Visa Type<br/> Subject/Field of Study<br/> Language Capabilities (Reading, Writing, Speaking)<br/> Social Security Number<br/> Occupation<br/> Comments<br/> Travel Itineraries<br/> Expertise Types and Levels (1-5)</p> |
| <p><b>Exchange Visitors Database – Enhanced (EVDB-E)</b></p> | <p>Individual’s Name<br/> Organization / Institution Name<br/> Business Street Address<br/> Business City Address<br/> Business State and Zip Code, or Province and Country<br/> Business Phone<br/> Business Email<br/> Gender</p>   |
| <p><b>Executive Office Suite - EOS</b></p>                   | <p>Individual’s Name<br/> (Last, First, Second Last, Middle Names; Suffix)<br/> Familiar Name<br/> Phone Number<br/> Email Address<br/> Home Street Address<br/> Home City Address<br/> Home State, or Province and Country Address<br/> Organization (employer) Name<br/> Organization Address<br/> Organization Position</p>  |

| Sub-system  | PII data element   |
|---|--|
|   | Organization Contact Individual's Name   |
| <b>IV Upcoming Projects,<br/>Online Resource Directory,<br/>ORDIV</b> | Individual's Name<br>(Prefix; Last, First)<br>Title<br>Work Phone Number<br>Work Email<br>Organization Name<br>Organization Street Address (Lines 1,2,3)<br>Organization City Address<br>Organization State Address<br>Organization Zip Code Address<br>Organization Country Address<br>Organization Phone<br>Organization Email<br>Organization Website |
| <b>NPA-CIV</b>  | Individual's Name<br>Organization / Institution Name<br>Organization Phone<br>Organization Email<br>Business Phone<br>Business Email<br>Bio  |
| <b>State Alumni Website</b>   | Email Addresses<br>Citizenship Country<br>Date of Birth<br>Prefix<br>Individual's Name<br>(Prefix; Last, First, Second Last, Middle Names; Suffix)<br>Second Last/Family Name<br>Maiden Name<br>Where do you live?<br>Gender<br>Program Name<br>Program Start and End Dates<br>Field of Study<br>Photo<br>Phone  |

| Sub-system | PII data element   |
|------------|--|
|            | Mobile Phone<br>ICQ<br>AIM ID<br>Yahoo ID<br>MSN ID<br>User generated bio<br>Hobbies<br>Professional/Academic interests<br>Primary Website<br>Address, Current<br>Address, Permanent |

The second level of PII data on U.S. citizens is **solely official contact information of U.S. federal employees**. The ECA-PMOS child systems that fall within this category are listed in the table immediately below. Of the systems in this table, all but English Language Fellows and Federal Exchanges Data System also contain PII data on non-US citizens.

| Sub-system                              | PII data element   |
|---|--|
| <b>Access Microscholarship Program</b>  | Individual's Name<br>Business Address<br>Business Phone Number<br>Business Email |
| <b>Alumni Affairs Management System</b> | Individual's Name<br>Business Address<br>Business Phone Number<br>Business Email |
| <b>E-Teacher</b>                        | Individual's Name<br>Business Address<br>Business Phone Number<br>Business Email |
| <b>English Language Fellows (ELF)</b>   | Individual's Name<br>Phone Number<br>Email Address                               |
| <b>Exchange Visitor Information</b>     | Individual's Name  |

|   |   |
|---|---|
| <b>System (EVIS)</b>                        | (First, Last)<br>Business Name<br>Business Address<br>Business Phone Number   |
| <b>Federal Exchanges Data System (FEDS)</b> | Individual's Name<br>(Prefix; Last, First)<br>Organization Name<br>Organization Street Address (Lines 1,2,3)<br>Organization City Address<br>Organization State Address<br>Organization Zip Code Address<br>Organization Country Address<br>Organization Phone<br>Organization Fax Number<br>Organization Cell Phone Number<br>Organization Email<br>Organization Website |

The third level of PII data is solely collected on non-U.S. citizens. The ECA-PMOS systems that falls within this category is:

- FSA Eurasia;
- Post EVDB Web; and
- Sevis-Lite.

The PII data has several sources, including individuals, depending on the Exchange Program. All involve either direct collection of information or use of data already collected by or for the U.S. Department of State.

- Data is provided by Public Diplomacy staff at the Embassy, after prior collection from the individuals.
- Data is collected from individuals by NGO's acting under contract to Department of State. NGOs then provide that data to Department of State.
- Data is entered directly by individuals into a form on a Department of State website.
- Data is copied from one of the component information systems to another component information system for a use related to the original reason for the data collection.

**b. How is the information collected?**

**AEIS II** collects data as direct online input by Department of State ECA Academics Exchange Specialists or by email sent from Grantee Organizations managing the Exchange Program. There is no direct access into the system other than via the Department's intranet network.

**Alumni Archive** has data automatically loaded from other Department Academic Exchange systems (ie, EVDB-E, AEIS II, Eureka). Also Posts and Program Agencies (under contact with the Department) email or mail the information to the Alumni Archive system manager to upload into Alumni Archive. The information is sent upon request by the system manager or as a condition of the grant.

**COINS** collects ASPE enrollment information directly from Program Agencies who email the information or who manually enter the data online. The information is also collected automatically from other Department authorized systems. Exchanges Participants and Grantees do NOT access COINS directly.

**English Language Fellows** collects the Department employees official contact information by entering the data online directly into the system. The Grantee Organization cannot update any data but it can view the data.

**English Language Specialists** collects information on speakers directly from each candidate via a web form or indirectly when the information is emailed by the candidate to the English Language Programs Office that manages the Program.

**Eureka** collects information from Department Program staff via online manual input, automatically from other Department systems and automatically from the Department of Homeland Security's SEVIS system.

**EVDB –E** collects business contact information of US Citizens who are contracted with Program Agencies / Grantee Organizations or employed by the Department of state via online manual input by the contacts themselves or by staff in the supporting Program office.

**EVIS** has not collected any new information since 2004 when it was retained in read-only mode for its historical account of Exchanges.

**EOS** collects information via manual online entry by Department of State's ECA Budget and Grants Offices.

**FSA Eurasia** has not collected any new information since 2008 when it was retained in read-only mode for its historical account of Exchanges. It's Participant data will be migrated into AEIS II after which time it will be retired as a system.

**IV Upcoming Projects, Online Resource Directory, ORDIV, NPA-CIV** collect data as direct input by the individuals in the respective organizations reported or by staff in those organizations.

**State Alumni** collects information directly from public individuals (alumni of Exchange programs, U.S. host families, Department of State personnel) at the time they create their accounts to access the system. On some occasions, the Alumni Affairs office staff use existing lists of Program participants to create user accounts in bulk, but individuals must still activate their account or their data is deleted from the system after two months. Until accounts are activated and verified by the subject individual, the corresponding account information is only visible to administrators (ECA Alumni Affairs Office and the ECA front office). Registering Alumni must indicate if they choose to have authorized Department of State staff contact them regarding their Program participation, and they must also indicate if they choose to have their profile marked as "public" versus "private". A "public" option allows authorized Department of State staff to view the Participant's profile. Users have full control over the privacy of their account information.

**For ECA-PMOS systems covered in this document that collect contact information on the federal workforce**, that contact data is either entered in the systems by the

subjects themselves or is entered by Department of State staff supporting the respective program and office from the global address list.

**c. Why is the information collected and maintained?**

The information is collected and maintained to provide contracted Program Agencies or Grantee Organizations with sufficient data to contact and evaluate an Exchange nominee or participant, and to provide the public with contact information at Grantee organizations regarding programs of interest.

**d. How will the information be checked for accuracy?**

Information collected directly from the record subject is presumed to be accurate. The contact information about an individual is collected from Department of State records and interviews with the subject individual.

**e. What specific legal authorities, arrangements, and/or agreements define the collection of information?**

- 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. Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

Information collected and maintained by ECA-PMOS systems is the minimum amount of information necessary to identify potential and awarded Grantees and Participants for Exchange Programs. Basic contact information is necessary to contact the subject individual or submitter if needed.

Because Personally Identifiable Information is collected and maintained by ECA-PMOS, appropriate management, technical and operation security controls are in place to ensure the confidentiality and integrity of the data. Access is available only to authorized Department of State employees performing sanctioned duties. Users must pass a government background check prior to having system access. Annual, recurring security training is practiced and conducted through Diplomatic Security. Access to computerized files is password-protected. The computerized files are available only on the Department of State intranet or on the internet but hosted internally at the Department of State or an authorized, contracted off-site hosting facility.

**4. Uses of the Information**

**a. Describe all uses of the information.** The information is used to:

- evaluate and award nominees / candidates of Department of State Exchange programs,

- process the Participant through the subject Exchange program,
- provide official contact information to the public for Exchange programs
- generate reports used by Department of State managers and staff in the management of an Exchange program
- allow Department of State and contacted Grantee organizations to contact current Exchange participants and alumni of Exchange programs
- fulfill requirements of the Department of Homeland Security.

There is no placement of Personally Identifiable Information on portable computers. Authorized system users who telecommute can only access the system through the Department of State's secure access using the ONE system with two-factor authentication where one of the factors is provided by a fob with a use-once password.

**b. What types of methods are used to analyze the data? What new information may be produced?**

The data in ECA-PMOS is not used for analytical purposes. No new information may be produced, except high-level statistics for program reporting purposes sent to the White House and Congress as required or published on the Federal Exchanges Data System website.

**c. If the system uses commercial information, publicly available information, or information from other Federal agency databases, explain how it is used.**

ECA-PMOS does not use commercial information, publically available information, or information from other Federal agency database when processing information on U.S. citizens.

**d. Are contractors involved in the uses of the PII?**

Contractors are involved with the operational maintenance of the system. Contractors use the data in ECA-PMOS consistent with the statutory purposes, and do not produce any additional data. Privacy Act contract clauses are inserted in their contracts and other regulatory measures are addressed. Rules of Behavior have been established and training regarding the handling of PII information under the Privacy Act of 1974, as amended.

Contractors are employed by the U.S. Department of State within the Bureau of Educational and Cultural Affairs as members of staff to support Bureau programs. All contractors, whether technical or direct program support, must pass a government background check prior to having system access. Annual, recurring security training is practiced and conducted through Diplomatic Security.

**e. Privacy Impact Analysis: Describe the types of controls that may be in place to ensure that information is handled in accordance with the above uses.**

Data collected and maintained by the ECA-PMOS is only used for purposes of managing the respective Exchange program, for fulfilling the program requirements and for ECA internal task assignments. The information is not analyzed or disseminated for

any other purpose. ECA-PMOS does not provide flexibility of features that might initiate a functional vulnerability creep or threat.

Authorized employees are assigned level-of-access roles based on their job functions. Rose limit the update and printing capabilities to those deemed necessary for specified job functions.

## 5. Retention

### a. How long is information retained?

These records will be maintained until they become inactive, at which time they will be destroyed or retired in accordance with published record schedules of the Department of State and as approved by the National Archives and Records Administration. For detailed descriptions of the appropriate record disposition schedules, see Domestic Records Disposition Schedules Chapter 36: Bureau of Educational and Cultural Affairs Office of Academic Exchange Programs (ECA/A/E).

### e. Privacy Impact Analysis: Discuss the risks associated with the duration that data is retained and how those risks are mitigated.

A potential risk may occur when an Alumni has out-dated information in State Alumni. This risk is mitigated through the requirement that the Alumni update their own profile in the system for correctness and completeness.

## 6. Internal Sharing and Disclosure

### a. With which internal organizations is the information shared? What information is shared? For what purpose is the information shared?

For Participants on Programs where their Grant provides health benefits through the Department's self-insured Accident and Sickness Program for Exchanges (ASPE), the Participants data is automatically fed into the COINS system. Where the automated data feed is not established, responsible Program offices can manually enroll online their Program Participants into ASPE. With the exception of the ASPE Administrators, staff managing a particular Program is restricted to access data on individuals participating in their particular Program. The Participants no do have access to COINS. Data shared is the Participants name, contact information (home and mailing addresses, email), gender, birth date, citizenship and ASPE coverage dates.

All ECA Exchange offices provide (electronic feeds or manual input) Participant bio, contact and Program data to the Exchanges Statistical Management System (ESMS) administered by the ECA Executive Office. ESMS aggregates the Participant data into high-level program data for reporting to Congress and the public. It does not report any individual's information,. ESMS does not store any Participant personal data fed into the system; it merely categorizes and summarizes the data to report at the Program level.

The Offices of Citizen Exchanges, International Visitors and Academic Exchanges provide Participant data to the Alumni Affairs office for inclusion in the Alumni Archive database. The data is available to authorized Department employees on the Department's intranet and used to re-engage with alumni and maintain up-to-date

records to facilitate public diplomacy outreach. Bureau staff access the database for statistical data on participants to be used in Congressional testimony or results reporting.

**b. How is the information transmitted or disclosed? What safeguards are in place for each sharing arrangement?**

All information is transmitted via automated electronic feeds or via manual online input.

**c. Privacy Impact Analysis: Describe risks to privacy from internal sharing and disclosure and describe how the risks are mitigated.**

When shared within the Department, all information is still used in accordance with ECA-PMOS stated authority and purpose. Risks to privacy are mitigated by granting access only to authorized persons.

All employees of the Department of State have undergone a thorough personnel security background investigation. Access to Department of State facilities is controlled by security guards and admission is limited to those individuals possessing a valid identification card or individuals under proper escort. All records containing personal information are maintained in secured-file cabinets or in restricted areas, access to which is limited to authorized personnel. Access to computerized files is password-protected and under the direct supervision of the system manager. The system manager has the capability of printing audit trails of access from the computer media, thereby permitting regular ad hoc monitoring of computer usage.

## **7. External Sharing and Disclosure**

**a. With which external organizations is the information shared? What information is shared? For what purpose is the information shared?**

Privacy Data on non-US Citizens is sent to the SEVIS system at the Department of Homeland Security from the following systems: AEIS II, Eureka, EVDB and EVDB-E. The Department of Homeland Security requires electronic submission of Visa and J1 Visa applications. This data is provided to Homeland Security by the ECA-PMOS system to aid that agency in processing these individuals at their point-of-entry into the U.S.

Data is also shared with Grantee organizations under the terms of their Grant. They are restricted to access data on individuals that are applicants, candidates or participants on their Program. Information is shared to confirm ASPE enrollments, re-engage alumni and abide by federal regulations involving visits by non-US citizens. Data is also shared to provide Program contact information.

**b. How is the information shared outside the Department? What safeguards are in place for each sharing arrangement?**

Systems sending data to and from Homeland Security do so through a web service using HTTPS protocol that enforces encryption.

Grantee organizations are required to authenticate their credentials to access ECA-PMOS systems through a unique login ID and encrypted password. Each organization can only access data on participants enrolled in their respective grant programs.

Where individual participants are authorized to access their own participant records via the internet, as in the case of State Alumni, the participants have exclusive control as to who can view their personal and program information. Participants must also grant Department of State employees permission to contact them regarding past and potential upcoming programs.

There is no anonymous access to ECA-PMOS systems containing personal information outside the Department.

**c. Privacy Impact Analysis: Describe risks to privacy from external sharing and disclosure and describe how the risks are mitigated.**

Risks to privacy are mitigated by limited access to and release of personal information on a need-to-know basis or as in the case of State Alumni, as authorized explicitly by the individual alumni.

## 8. Notice

The system:

- contains information covered by the Privacy Act.  
Provide number and name of each applicable systems of records.  
(visit [www.state.gov/m/a/ips/c25533.htm](http://www.state.gov/m/a/ips/c25533.htm) for list of all published systems):  
[Educational and Cultural Exchange Program Records. STATE-08](#)  
[Overseas Records. STATE-25](#)
- does NOT contain information covered by the Privacy Act.

**a. Is notice provided to the individual prior to collection of their information?**

A Privacy Act Statement is available for those individuals that provide this information by form and notice is given through

**b. Do individuals have the opportunity and/or right to decline to provide information?**

The individual may decline to provide the required information; however, such actions may prevent them from participating in Exchanges programs.

**c. Do individuals have the right to consent to limited, special, and/or specific uses of the information? If so, how does the individual exercise the right?**

Conditional consent is not applicable to the official purpose of ECA-PMOS except in the case of State Alumni where individuals control if they allow Department staff to contact them and if they want their program participation accessed by the public.

**d. Privacy Impact Analysis: Describe how notice is provided to individuals and how the risks associated with individuals being unaware of the collection are mitigated.**

Notification is provided to the Public via System of Records Notices STATE-08 and STATE-25.

## 9. Notification and Redress

### a. What are the procedures to allow individuals to gain access to their information and to amend information they believe to be incorrect?

Individuals who wish to gain access to or amend records pertaining to themselves should write to the Director, Office of Information Programs and Services; Department of State; SA-2; 515 22nd Street NW; Washington, DC 20522-6001. The individual must specify that they wish the Cultural Property Advisory Committee Records to be checked. At a minimum, the individual should include: Name; date and place of birth; social security number; current mailing address and zip code; signature; a brief description of the circumstances that caused the creation of the record, and the approximate dates which give the individual cause to believe that the Office of International Information Programs has records pertaining to them.

### b. Privacy Impact Analysis: Discuss the privacy risks associated with notification and redress and how those risks are mitigated.

Procedures are available for individuals to access or amend records they believe are incorrect. The notice is reasonable and adequate in relationship to the system's purpose and use.

## 10. Controls on Access

### a. What procedures are in place to determine which users may access the system and the extent of their access? What monitoring, recording, and auditing safeguards are in place to prevent misuse of data?

The level of access and capabilities permitted is restricted by the role assigned to each individual user. Some users are granted read-only access if they have no need to update system records. The separation of roles with different access privileges is in accordance with NIST Special Publication 800-53.

All authorized staff using the system 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 the Privacy Act (subsection e[9] ) and OMB Circular A-130, Appendix III.

The security controls in the system are reviewed when significant modifications are made to the system, but at least every three years.

Access to ECA-PMOS is restricted to Department of State personnel, Grantee organizations under contractual terms of their Grant and to the public where publication of their personal information, as in the case of State Alumni, is determined by the individual.

Department of State system users must pass a government background check prior to having system access. At a minimum, they must possess a security clearance level of

confidential, with secret preferred. Annual, recurring security training is practiced and conducted through Diplomatic Security.

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 as recorded in the system.

Contractors authorized to access the system are governed by contracts identifying rules of behavior for Department of State systems and security. Contracts are reviewed upon renewal by management and contract personnel expert in such matters.

**b. What privacy orientation or training for the system is provided authorized users?**

Annual, recurring security training is practiced and conducted through the Bureau of Diplomatic Security

**c. Privacy Impact Analysis: Given the sensitivity of PII in the system, manner of use, and established access safeguards, describe the expected residual risk related to access.**

Several steps are taken to reduce residual risk related to system and information access. 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 regularly analyzed and reviewed to deter and detect unauthorized uses. (An audit trail provides a record of which particular functions a particular user performed--or attempted to perform--on an information system.)

The certification and accreditation process independently verifies and validates the application system security controls. Administrative procedures, including independent security investigations of Department applicants and assignment of unique system access rights to individuals, limit access to the system.

There is little residual risk related to access, in particular because the system is available only on a Department of State intranet and there is minimal and controlled direct electronic transfer of data between IIP-PMOS and hosts accessible to external organizations or individuals.

## **11. Technologies**

**a. What technologies are used in the system that involve privacy risk?**

All hardware, software, middleware and firmware are vulnerable to risk. There are numerous management, operational and technical controls in place to mitigate these risks. Applying security patches and hot-fixes, continuous monitoring, checking the national vulnerability database, following and implementing sound federal, state, local, department and agency policies and procedures are only a few of safeguards implemented to mitigate the risks to any information technology.

**b. Privacy Impact Analysis: Describe how any technologies used may cause privacy risk, and describe the safeguards implemented to mitigate the risk.**

Information is transmitted via email quite frequently. A potential risk includes an email containing personally identifiable information inadvertently sent to an unauthorized recipient.

To mitigate this risk, Department of State staff receives training and notifications warning of phishing scams to obtain personal data.

## **12. Security**

**What is the security certification and accreditation (C&A) status of the system?**

As a component system to the Educational and Cultural Affairs Program Management and Outreach System, ECA-PMOS was granted Full Accreditation at the Sensitive-But-Unclassified (SBU) level in May 2007. The authorization is valid for up to 36 months. This Accreditation expires on May 31, 2010, or upon significant change to the system, application, or environment.