



**USAID**  
FROM THE AMERICAN PEOPLE

## Training Results and Information Network - Visa Compliance System (TraiNet-VCS) Privacy Impact Assessment (PIA)

### UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

---

Office of the Chief Information Officer (M/CIO)

Information Assurance Division

Training Results and Information Network - Visa Compliance System (TraiNet-VCS)

Approved Date: December 13, 2016

#### Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

#### Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

## Table of Contents

<i>1</i>	<i>Introduction</i> .....	<i>1</i>
<i>2</i>	<i>Information</i> .....	<i>1</i>
2.1	Program and System Information.....	1
2.2	Information Collection, Use, Maintenance, and Dissemination.....	5
<i>3</i>	<i>Privacy Risks and Controls</i> .....	<i>7</i>
3.1	Authority and Purpose (AP).....	7
3.2	Accountability, Audit, and Risk Management (AR).....	9
3.3	Data Quality and Integrity (DI).....	9
3.4	Data Minimization and Retention (DM).....	10
3.5	Individual Participation and Redress (IP).....	11
3.7	Transparency (TR).....	12
3.8	Use Limitation (UL).....	13
3.9	Third-Party Web Sites and Applications.....	13

## 1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

## 2 Information

### 2.1 Program and System Information

#### 2.1.1 Describe the PROGRAM and its PURPOSE.

USAID operates the TraiNet/Visa Compliance System (VCS) under the authority of the Mutual Educational and Cultural Exchange Act of 1961 (P.L. 87-256), as amended (22 U.S.C. 2460 (f) and (g)), the Act's implementing "Exchange Visitor Program" regulations (CFR Title 22, Part 62), and Executive Order 13055 ("Coordination of United States Government International Exchanges and Training Programs"). The purpose the Act is to increase mutual understanding between the people of the U.S. and the people of other countries by means of educational and cultural exchanges. International educational and cultural exchanges are one of the most effective means of developing lasting and meaningful relationships. At present, the U.S. Department of State (DOS) has fifteen categories of exchange. Foreign national participating in Exchange Visitor (EV) programs may only engage in activities authorized for their program.

USAID functions as one of the founding, statutory members of the Interagency Working Group (IAWG) on U.S. Government-Sponsored International Exchanges and Training. In addition, USAID establishes and administers policy and procedures (see ADS 252 and ADS 253).

#### 2.1.2 Describe the SYSTEM and its PURPOSE.

TraiNet-VCS is a major application/database used by USAID to capture and store data from Agency exchanges, training, and educational activities of foreign nationals. The database tool, which has been designated by USAID Senior Leadership as an Enterprise System, is also used for maintaining compliance with U.S. Government Visa requirements. TraiNet-VCS enables the Agency to meet its requirement to report to Congress and DOS on all Agency training activities. TraiNet-VCS is also used by the Agency's Washington, DC area operations and its field missions to capture and report on their training numbers, costs and various fields of training, whether in the U.S., the foreign national's home country, or a third country. TraiNet is a web-based application, and there is no single "form" used to collect data.

Initially, the following data is provided by the in-country USAID mission:

- Participant Name (for long-term programs) - names and personal data, other than gender, are not entered for 95% of USAID training programs because this training takes place in the home country in large groups, accounting for over 2 million individuals each year
- Participant Country of Residence
- Subject Matter Area
- Program Name
- Start and End Dates

### 2.1.2 Describe the SYSTEM and its PURPOSE.

- Total number of Participants per Participant group, with gender breakdown
- Total cost of each Participant Training program

U.S.-based training requires additional individual files because of the process to secure the appropriate form for a J-1 visa application. Sponsoring Units, which are operating units that fund these programs, must update the estimated Participant Training costs that were developed during the planning phase. Actual Participant Training costs incurred are reported in TraiNet within 30 calendar days (90 calendar days for long-term programs) of the completion of each program (see ADS 253.3.3).

The following Exchange Visitor (EV) information is entered into the system by authorized users:

- Last Name (first and last name must match the first and last name as they appear on the passport)
- Gender
- Birth Date
- Birth City
- Birth Country
- Residence Country
- Citizenship Country
- Funding Information
- Budgeted Funding amount

The following End of Program data is entered by authorized USAID contractor/grantee personnel for participants attending U.S. programs:

- Participant Status – Update EV status to “In Training” when the EV has arrived at the program site and then “Achieved” or other applicable status at end of the program.

TraiNet-VCS captures worldwide data used for various reports as well as for missions and Washington, DC offices to manage individual programs and reports to Mission or Office Directors. Data that involves individuals who will be trained in the U.S. encounters a series of security checks conducted through USAID’s Security Risk and Fraud Inquiry (SRFI) (see ADS 252). Once an individual clears the security assessment, four Office of Education officers can approve the files, and the information is electronically submitted to the U.S. Department of Homeland Security (DHS) through a file batch process (not a direct data transfer). DHS then sends USAID a PDF file that is printed, signed, and then used for the U.S. Visa application. Using the data that is entered into TraiNet, the system generates a USAID J Visa DS-2019 Form.

TraiNet enables USAID to constantly manage individual program information, and particularly the U.S. programs, to ensure compliance with the Exchange Visitor Act and Homeland Security monitoring requirements. TraiNet also allows authorized users to maintain information about a participant up-to-date throughout the life of his or her program. The system has appropriate hosting at two sites as required by a recent FISMA audit.

In approximately 2018, TraiNet will be re-designed in order to enhance system security to comply with FISMA requirements.

**2.1.3 What is the SYSTEM STATUS?**

- New System Development or Procurement
- Pilot Project for New System Development or Procurement
- Existing System Being Updated
- Existing Information Collection Form or Survey  
OMB Control Number:
- New Information Collection Form or Survey
- Request for Dataset to be Published on an External Website
- Other:

**2.1.4 What types of INFORMATION FORMATS are involved with the program?**

- Physical only
- Electronic only
- Physical and electronic combined - Information for an individual's file is collected from USAID forms. Foreign National Personally Identifiable Information (PII) is uploaded into TraiNet from the VCS Passport Face Page; other information comes from USAID paper forms, which are saved/scanned and uploaded in various formats (e.g., .doc, .pdf, .xls).

**2.1.5 Does your program participate in PUBLIC ENGAGEMENT?**

- No.
- Yes:
  - Information Collection Forms or Surveys
  - Third Party Web Site or Application
  - Collaboration Tool

**2.1.6 What type of system and/or TECHNOLOGY is involved?**

- Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
- Network
- Database
- Software
- Hardware
- Mobile Application or Platform
- Mobile Device Hardware (cameras, microphones, etc.)
- Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)

<b>2.1.6 What type of system and/or TECHNOLOGY is involved?</b>
<input type="checkbox"/> Wireless Network
<input type="checkbox"/> Social Media
<input type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input checked="" type="checkbox"/> Website or Webserver
<input checked="" type="checkbox"/> Web Application
<input type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

<b>2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?</b>
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input type="checkbox"/> USAID employees and personal services contractors
<input type="checkbox"/> Employees of USAID contractors and/or services providers
<input checked="" type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input type="checkbox"/> Others:
<input type="checkbox"/> None

## 2.2 Information Collection, Use, Maintenance, and Dissemination

<b>2.2.1 What types of personal information do you collect, use, maintain, or disseminate?</b>
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input checked="" type="checkbox"/> Date of Birth
<input checked="" type="checkbox"/> Place of Birth
<input checked="" type="checkbox"/> Home Address – country of residence only
<input checked="" type="checkbox"/> Home Phone Number
<input checked="" type="checkbox"/> Personal Cell Phone Number
<input checked="" type="checkbox"/> Personal E-Mail Address
<input checked="" type="checkbox"/> Work Phone Number – voluntarily provided
<input type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input checked="" type="checkbox"/> Passport Number or Green Card Number – entered from the passport face page, as the passport is a required document
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input checked="" type="checkbox"/> Tax Identification Number
<input checked="" type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input type="checkbox"/> Employment or Salary Record
<input checked="" type="checkbox"/> Medical Record
<input checked="" type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input checked="" type="checkbox"/> Financial Record
<input checked="" type="checkbox"/> Education Record
<input checked="" type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input checked="" type="checkbox"/> Sex or Gender

### 2.2.1 What types of personal information do you collect, use, maintain, or disseminate?

- Age
- Other Physical Characteristic (eye color, hair color, height, tattoo)
- Sexual Orientation
- Marital status or Family Information – required only if dependent(s) accompanies Exchange Visitor
- Race or Ethnicity
- Religion
- Citizenship
- Other: SEVIS ID/EV ID
- No PII is collected, used, maintained, or disseminated

### 2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

- Log Data (IP address, time, date, referrer site, browser type)
- Tracking Data (single- or multi-session cookies, beacons)
- Form Data – all program forms are on the USAID data base and identified in ADS 252 and 253
- User Names – provided to individuals with approved access to the system; participants have no access
- Passwords – computer generated and sent to individuals with approved access to the system
- Unique Device Identifier
- Location or GPS Data
- Camera Controls (photo, video, videoconference)
- Microphone Controls
- Other Hardware or Software Controls
- Photo Data
- Audio or Sound Data
- Other Device Sensor Controls or Data
- On/Off Status and Controls
- Cell Tower Records (logs, user location, time, date)
- Data Collected by Apps (itemize)
- Contact List and Directories



### 2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

- Biometric Data or Related Data
- SD Card or Other Stored Data
- Network Status
- Network Communications Data
- Device Settings or Preferences (security, sharing, status)
- Other:
- None

### 2.2.4 Who owns and/or controls the system involved?

- USAID Office: E3/ED/HEWT
- Another Federal Agency:
- Contractor: Rivera Group (system management)
- Cloud Computing Services Provider:
- Third-Party Website or Application Services Provider: Peak 10 (vendor to Rivera Group for both primary and remote redundant servers)
- Mobile Services Provider:
- Digital Collaboration Tools or Services Provider:
- Other:

## 3 Privacy Risks and Controls

### 3.1 Authority and Purpose (AP)

#### 3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?

Under authority of Section 621 of the Foreign Assistance Act of 1961, as amended, USAID provides training of host country nationals to assist countries in developing the managerial, technical and policy leadership skills required to create and implement their own development plans.

USAID is required by Executive Order 13055, issued on July 15, 1997, to deliver to DOS annually through the Inter-Agency Working Group for Exchanges and Training (IAWG) as well as to ensure that Federal guidelines related to participant trainees and Exchange Visitors (EVs) are managed correctly and include the data collection for an additional 2.5 million files for individuals trained in their home country or in a third country.

### **3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?**

USAID must address DHS reporting issues which are handled through the data base through the SEVIS reporting of U.S.-based participants as we track and monitor, and adequately secure visas for the approximate 3,000 U.S.-based participants. The Agency must also monitor and report on all participants and EVs as directed in the Mutual Educational and Cultural Exchange Act of 1961, as amended (22 USC 2460 (g), 22 CFR, Part 62), regulations and ensure that IRS tax regulations related to the filing of the 1040NR are monitored.

For USAID, the database is the primary method of managing compliance of ADS 252 on Visa Compliance and ADS 253 on Participant Training and Exchanges, which also helps individuals' offices and missions track mission and USAID Washington, DC sector strategies. The system is also responsible for insuring compliance with M/CIO FISMA requirements.

Reports are broad based and provide missions and USAID Washington, DC offices with overall pictures of their programs, both the number of individuals as well as the training costs.

### **3.1.2 Why is the PII collected and how do you use it?**

Approved users, who are employees of USAID, access the system to enter the PII provided by the data subject. Prior to entering the PII, the approved user validates the PII by contacting the data subject's employers. Validation relies on information derived from the data subject's passport. There is also a security review at post by the Regional Security Officer (RSO), mission or Consular Official.

Most reports are broad-based and are designed to provide overall data (see examples below). Participant names are rarely used unless a report is specific to that person/sector/training program, with the report being generated for a specific reason, i.e., by a USAID Sponsoring Unit or Operating Unit. The new Exchange Visitor (EV) file shown below is what is compiled from the passport face page, along with routine data entry to capture program information. Other reports are provided below to illustrate how general the reports are in nature without needing to show foreign national PII.

### **3.1.3 How will you identify and evaluate any possible new uses of the PII?**

The collection and use of foreign national PII is limited to fulfill the legally defined purpose for this program. The foreign national PII is not used for any other purpose. (Reference: Executive Order 13055 of July 15, 1997, Coordination of United States Government International Exchanges and Training Programs; Omnibus Consolidated and Emergency Supplemental Appropriations Act of 1999, as amended, Public Law 105-277, section 101(b) amended the Mutual Educational and Cultural Exchange Act of 1961 (P.L. 87-256), as amended, (22 USC 2460 (f) and (g)); Mutual Educational and Cultural Exchange Act of 1961, as amended, Public Law 87-256, 22 U.S.C. 2451, et seq. (1988); Immigration and Nationality Act, as amended, 8 U.S.C. 1101(a)(15)(J); 22 CFR 62, Exchange Visitor Program.)

## 3.2 Accountability, Audit, and Risk Management (AR)

### 3.2.1 Do you use any data collection forms or surveys?

No:

Yes:

Form or Survey (Please attach) - As required by ADS 252.3.3, AID 1380-1 "Bio Data," ADS 252-1 "Conditions of Sponsorship," and AID 1380-5 "Dependent Certification" (only applicable if dependents accompany the visitor). All AID forms have been approved by M/MS/IRD. The face page of the visitor's passport is also required, in addition to these forms.

OMB Number, if applicable:

Privacy Act Statement (Please provide link or attach PA Statement)

### 3.2.3 Who owns and/or controls the personal information?

USAID Office: E3/ED/HEWT

Another Federal Agency:

Contractor: Rivera Group has administrative rights to the system and information.

Cloud Computing Services Provider:

Third-Party Web Services Provider: Peak 10 (vendor to Rivera Group for both primary and remote redundant servers)

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

### 3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?

No.

Yes:

## 3.3 Data Quality and Integrity (DI)

### 3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

Sponsoring Units collect foreign national PII from an individual trainee and complete an AID 1380-1 form. The form data is entered into the system via an approved user of the system after the data has been vetted and verified multiple times by Rivera staff, USAID program and mission staff, and DHS ICE staff in the SIS system. Vetting can include checking with employers, using passport information, or a security review at post by the RSO, mission or Consular Official.

**3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?**

Data is vetted before being entered into the system through the process documented in ADS 252. According to this process, all data entered into the system by a class of users defined as the R1-Initiator is next verified as part of the system workflow by a class of users defined as R2-Verifier (using the same hard-copy documents used for data entry). R2-Verifiers must be within the same organization as the R1-Initiator and the R2-Verifier must have supervisory control over the R1-Initiator. Changes to the data are generally minimal, and include updating a passport number, adding a new training site address, or changing the training dates or estimated training budget.

**3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?**

System users are the Sponsor Units or Implementers of EV programs. ADS 252.3.8, which is applicable to system users, emphasizes the vital importance to the U.S. Government of monitoring international students and other EVs enrolled in USAID activities. USAID policies and supporting procedures and systems for monitoring USAID-sponsored EVs reflect SEVIS requirements. System users are responsible for monitoring the whereabouts and program particulars of EVs and dependents at all times while they are engaged in a USAID program. During the course of an EV's program, ADS 252.3.8.3 stipulates that Sponsoring Units or Implementers must immediately update in TraiNet/VCS any inaccuracies or changes in relevant EV data, including foreign national personal information.

**3.4 Data Minimization and Retention (DM)**

**3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?**

Minimal foreign national PII necessary is what is required to produce a DS 2019 form for the submission of a visa to the U.S.

**3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?**

No.

Yes:

**3.4.4 What types of reports about individuals can you produce from the system?**

Aggregated statistical reports are frequently generated from the system. Reports can be generated about a specific person or group at the direction of the COR under specific circumstances as outlined in ADS 252 and ADS 253.

**3.4.6 Does the system monitor or track individuals?**

*(If you choose Yes, please explain the monitoring capability.)*

No.

Yes:

**3.5 Individual Participation and Redress (IP)****3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?**

No. Foreign national PII in the TraiNet/VCS system is not collected directly from individuals. EV foreign national PII is collected from participating visitors by USAID AORs or CORs, or, more likely, from Program Implementers, in accordance with their awards. At the time of selection to a USAID program by the AOR or COR or Program Implementer in accordance with their award, each foreign national will be asked to provide only the PII specified in the privacy notices in the system or on uploaded forms. This information is needed by USAID in order to meet external statutory requirements for reporting and U.S. visa compliance (see 2.1.1 – Program Purpose).

These selected foreign nationals either voluntarily provide their PII or have the opportunity to opt-out of USAID's request for their PII by either participating in the program application process or refusing their selection in a given program. Foreign national EV selection and processing procedures are specified in each contract or agreement, and in ADS 252, Exchange Visitor Visa Compliance and ADS 253, Participant Training for Capacity Development. Agency AORs and CORs ensure oversight of these EV selection and processing requirements as they pertain to the foreign nationals' consent to collect and share their PII. Lastly, as a vital oversight redundancy, ADS 252.3.11, Compliance Monitoring and Verification requires all Agency AOR or CORs, contractors, agreement recipients, or grantees in accordance with the terms of their awards, to allow periodic monitoring and verification activities by the Agency Responsible Officer or Alternate Responsible Officers, including records reviews and site-visits, in part to conduct a review of EV selection and process procedures, including each foreign national's consent to collect and share his or her PII or to opt-out. Those foreign nationals who opt-out of providing their PII are not eligible for USAID-sponsorship.

**3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?**

The Agency complies with statutory requirements to submit foreign national EV PII updates in timely manner to DHS and DOS. Agency policies for updating EV PII are established in ADS 252.3.8.3, Exchange Visitor Biographical Data Updates and 252.3.8.4, Dependent Biographical Data and Status Updates.

Exchange Visitors provide any changes, including updates to their PII, to AORs or CORs, or, more likely, to Program Implementers in accordance with their awards, to update their records in both hardcopy and TraiNet-VCS. Access to an individual's records in the system is limited to only those authorized individuals tied to the Exchange Visitor's sponsored-activity. Agency Responsible Officer or Alternate Responsible Officers respond individually to requests from foreign national EVs to gain access to their PII maintained by the Agency; however, access to TraiNet-VCS is strictly limited to authorized users, and roles are limited by the "need to know." The need to know is established in the following manner in accordance with the provisions of ADS 252: R4-Submitters are nominated by the Agency Responsible Officer (System Owner) and the Department of State; R3-Approvers are nominated by USAID Mission or Washington-Office Directors; R2-Verifiers are nominated by R3-Approvers; and R1-Initiators are verified by Agency Agreement or Contracting Officer's Representatives (AOR or COR).

**3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?**

N/A

**3.7 Transparency (TR)****3.7.1 Do you retrieve information by personal identifiers, such as name or number?***(If you choose Yes, please provide the types of personal identifiers that are used.)*

- No.
- Yes: Individual files can be accessed by name or SEVIS ID number.

**3.7.2 How do you provide notice to individuals regarding?**

1) The authority to collect PII: Section 621 of the Foreign Assistance Act of 1961, as amended; Executive Order 13055; Mutual Educational and Cultural Exchange Act of 1961, as amended (22 USC 2460 (g)); and 22 CFR, Part 62 regulations.

2) The principal purposes for which the PII will be used: To track, monitor, and report on foreign nationals engaged in Participant Training (see ADS 253) or Exchange Visitor (see ADS 252) activities funded by USAID.

3) The routine uses of the PII: The PII requested will be used by USAID employees and implementers (i.e., contractors, recipients or grantees) to arrange, oversee, and report the sponsorship. USAID will share this information only with government agencies that have the statutory and lawful authority to maintain such information.

4) The effects on the individual, if any, of not providing all or any part of the PII: Disclosure of PII is voluntary, but failure to do so may preclude the individual from engaging in Participant Training or Exchange Visitor activities funded by USAID.

Sponsoring Units must not enter any information related to a U.S. citizen in the TraiNet/VCS system. Exchange Visitor participants are Aliens (foreign nationals) and are not subject to Privacy Act requirements. Nevertheless, as an extra precaution, Privacy Notices have been provided on all TraiNet forms. The Program Manager and System Owner are aware that legal changes are forthcoming which may extend Privacy Act protections to non-U.S. citizens. The Program Manager and System Owner will work with the Privacy Office to ensure compliance with new requirements and to update the necessary privacy documentation.

**3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?**

- No
- Yes:

**3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?**

N/A

### 3.8 Use Limitation (UL)

**3.8.1 Who has access to the PII at USAID?**

USAID Sponsoring Unit and Program Implementer staff (in accordance with their awards) and the Agency Responsible Officer and Alternate Responsible Officers for Visa Compliance have access to the specific set of data required by their position. Only the Program Manager, the ISSO, and select USAID staff, along with the contractor, Rivera Group, have administrative rights to the system database.

**3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?**

EV information in TraiNet/VCS can only be accessed outside of USAID by authorized implementing partners, such as training locations, who are limited to accessing data for only their specific EV training participants.

This system is not used to engage with the public, and the names of EVs are not made publicly available.

**3.8.4 Do you share PII outside of USAID? If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?**

No.

Yes: EV information is submitted to the DHS SEVIS system for visa issuance and verification. An SSL Certificate is used with the SEVIS Batch processes to connect to the DHS SEVIS system. See SEVIS SSL Certs for details.

Authorized users within an implementing partner (i.e., contractor, recipient or grantee) are granted appropriate user access to the records of assigned EVs. Web services connection to TraiNet/VCS requires SSL/TLS sessions which are enforced by trusted certificates from recognized root certificate authorities. Data in transit is encrypted via the TraiNet-VCS website and SEVIS SSL connections, which use AES 128, TLS 1.2.

### 3.9 Third-Party Web Sites and Applications

**3.9.1 What PII could be made available (even though not requested) to USAID or its contractors and service providers when engaging with the public?**

N/A

## Appendix A. Links and Artifacts

### A.1 Privacy Compliance Documents or Links

- |   |
|---|
| <input type="checkbox"/> None. There are no documents or links that I need to provide.                    |
| <input type="checkbox"/> Privacy Threshold Analysis (PTA)   |
| <input type="checkbox"/> Privacy Impact Assessment (PIA)  |
| <input type="checkbox"/> System of Records Notice (SORN)  |
| <input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)             |
| <input type="checkbox"/> Data Collection Forms or Surveys   |
| <input checked="" type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices                      |
| <input type="checkbox"/> USAID Web Site Privacy Policy  |
| <input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application                            |
| <input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents |