



## **Privacy Impact Assessment**

For:

**The LINCS Technology Project**

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Office of Vocational and Adult Education

U.S. Department of Education



- 1. System Information.** Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

The LINCS Technology Project system supports the Office of Vocational and Adult Education (OVAE) Division of Adult Education and Literacy's mission to provide high-quality evidence-based resources for adult educators at the state and local level to enable them to design and deliver high-quality learning opportunities for adults so they can successfully transition to and complete college career pathways leading to 21st Century jobs. OVAE will continue the work of the National Institute for Literacy's LINCS project. LINCS was transitioned over to OVAE in 2010, when the Institute closed.

The LINCS Technology Project is a comprehensive resource for leadership on literacy issues, including the improvement of reading instruction for children, youth, and adults. It has a sophisticated search capacity for Internet-based literacy-related information and content, electronic discussion lists, and training and technical assistance in the use of technology. These services enable practitioners, learners, and others to easily find free, high quality, reliable, relevant, and up-to-date Web-based information; find and share ideas with colleagues or learners; and improve skills in using technology for adult, family and other literacy education purposes. The project also includes the LINCS Community, where users will find discussion forums, news, events, shared resources, and professional development opportunities.

- 2. Legal Authority.** Cite the legal authority to collect and use this data. What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

The proposed information collection will be conducted as part of the Workforce Investment Act, under OVAE. It is authorized under Section 242 and 243 of the Adult Education and Family Literacy Act (20 U.S.C. 5292). The National Leadership Activities establish and carry out a "program of national leadership activities to enhance the quality of adult education and literacy programs nationwide."

- 3. Characterization of the Information.** What elements of personally identifiable information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)? What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

- 1.** LINCS website – the website will not collect any information from users at this time. There are plans to incorporate a sign in process, so that users can customize features and results, but this has not yet been implemented. When this process is established, the site will collect user log-in ID, first name, last name and email address.
- 2.** LINCS Community of Practice – the communities of practice will collect from the user, log-in ID, first name, last name, and email address.

- 4. Why is the information collected?** How is this information necessary to the mission of the program, or contributes to a necessary agency activity? Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.

The information collected on the LINCS Community is for identification and authentication purposes, allowing individuals to:

- Identify themselves to the system



- Authenticate with the system to prove that they are the same person when they return
- Carry out actions that impact that individual (e.g. signing up for a mailing list subscription)
- Publish information to make it available to others (e.g. forum posting, comment on publications or learning resources, etc.)
- Access control purposes (e.g. updating notification settings, following a discussion, etc.)

- 5. Social Security Number (SSN).** If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures. Also specify any alternatives that you considered, and why the alternative was not selected. If system collects SSN, the PIA will require a signature by the Assistant Secretary or designee. If no SSN is collected, no signature is required.

No SSN information is collected by any of the LINCS systems.

- 6. Uses of the Information.** What is the intended use of the information? How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.

The information is used by the system to identify and authenticate users, to authorize decisions, and is used by the direct users of the system to identify other users.

- 7. Internal Sharing and Disclosure.** With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared?

This information is not shared with any other ED organizations.

- 8. External Sharing and Disclosure.** With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)? What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?

This information is not shared with external entities.

- 9. Notice.** Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)? What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?

The LINCS system provides users with notice on the LINCS webpage. Identification of users allows us to support content contributed by the public and to provide a more personalized experience of our web sites. Registration is not required to generate searches or for other read-only access to the site. You may opt out of the registration portion of the website simply by not registering.

- 10. Web Addresses.** List the web addresses (known or planned) that have a Privacy Notice.

<http://lincs.ed.gov>

<http://community.lincs.ed.gov>

- 11. Security.** What administrative, technical, and physical security safeguards are in place to protect the PII? Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?



A firewall system protects the network boundary of the LINCS system. This firewall logs access to the LINCS infrastructure, and the OSSEC HIDS real-time log-monitoring tool monitors those network access logs and other system logs. The OSSEC system monitors system logs for anomalies and known issues. The entire LINCS system is within an access-controls data center, and no physical access is provided to the LINCS systems without escort by the data center operations personnel, and then only to individuals that have been granted access by OVAE. All privileged users of the system receive annual information security training developed by the Department of Education.

The LINCS system has an Authority to Operate (ATO) granted by the Department of Education that has been extended through September, 2012. The LINCS system is undergoing upgrades of security and infrastructure hardware, and a renewal of the long term ATO is being sought. The system is maintained and operated in accordance with FISMA guidance (e.g. NIST SP 800-53, et al), and Department of Education policy.

- 12. Privacy Act System of Records.** Is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a? Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?

No system of records is being created or altered by the LINCS system.

- 13. Records Retention and Disposition.** Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes – provide records schedule number:

Records are covered under General Records Schedule 23 item 7 Transitory Records. These records are destroyed immediately, or when no longer needed for reference, or according to a predetermined time period or business rule (e.g., implementing the auto-delete feature on electronic mail systems). (N1-GRS-04-5, item 1).