



## **Privacy Impact Assessment**

For

**Technical Assistance for States Developing Career Pathways Systems**

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Office of Elementary and Secondary Education (OESE)**

**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.*

Literacy Information and Communication System (LINCS) is a professional learning community for adult educators that provides access to resources, professional development, and a connected network of practitioners. This document applies to a collection of web pages to be added to the existing LINCS web site and portal at <http://LINCS.ed.gov> to support the Technical Assistance for Developing Career Pathways project (ED-VAE-13-R-0033).

### **Project Purpose and Purpose of the Network (Career Pathways Exchange)**

*Moving Pathways Forward: Supporting Career Pathways Integration* is a three-year initiative to assist states in advancing career pathways systems to transition low-skilled adults to postsecondary education and employment. By building upon the successes and lessons learned from earlier federal and state investments in career pathways, the project seeks to further integrate adult education into career pathways system development at the state and local levels. *Moving Pathways Forward* provides targeted technical assistance services to states and disseminates career pathways resources and activities to all interested stakeholders. The project is funded by the U.S. Department of Education's Office of Career, Technical, and Adult Education.

Part of the project funds the creation of a career pathways affiliate network (*Career Pathways Exchange*). The *Career Pathways Exchange* is an information dissemination service that identifies and distributes relevant news, resources, online discussions, events, and tools to all individuals interested in implementing successful career pathways programs. The Exchange will provide members with a convenient and comprehensive service for receiving information on career pathways from a connected network of federal and state agencies and partner organizations. Members of the Exchange will receive emails targeted to their selected areas of interest.

These pages are used to disseminate information about the project and its resources to interested Career Pathways stakeholders and affiliates of the *Career Pathways Exchange Network*. Information disseminated will typically include information about the project and links to materials useful to Network members, event information. To match information to interested audiences and distribute that information electronically, the site will collect contact information from applying members. Names and email addresses along with member selected interest areas are collected, but not disseminated. No financial information is collected.

## **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?*

This project is authorized under Title II, the Adult Education and Family Literacy Act of the Workforce Investment Act of 1998, Public Law 105-220, Section 243, National Leadership Activities. Section 243 allows the Secretary of Education to 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.**

*The information collected will be limited to First Name, Last Name, Email, Position or Title, Organization, City, State, Career Pathways Interest Areas, Source, Partner Page Link, and Consent.*

The information collected will be limited to First Name, Last Name, Email, Position or Title, Organization, City, State, Career Pathways Interest Areas, Source, Partner Page Link, and Consent.

The information will come from each individual member who applies for membership by accepting the terms of the membership agreement which acknowledge that the sole purpose of membership is for information dissemination in the interest areas selected and based on the context of the member's position, title, organization, or location. Members may be teachers, principals, administrators, business owners, local or state or federal program representatives, elementary or secondary or postsecondary educational representatives, or even vendors providing mission essential bridge program services like transportation or child care.

The information will be collected from each individual member by online electronic form and managed by Microsoft Access database to produce Interest-Area appropriate mailing lists for Constant Contact.

This information is not used to link or cross-reference other databases.

### **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 is collected to support the dissemination of resources through direct email which has been customized to benefit the target audience in an interest area of their choosing. In this way members may opt in or opt out of emails supporting specific interest areas and topics. Without this capability, the project will not be able to meet the expectations of this desired task as approved by OCTAR. Interest area selection will customize communications received through the Network so that individuals will not be forced to either accept or reject all communications regardless of topic or interest area.

The privacy risks for this information are nominal as this information is ordinary business contact information frequently available through public or professional correspondence means. No information is shared, cross-referenced, or made accessible to any other system.

## **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.*

The system does not collect SSNs.

## **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.*

All information is used by the Technical Assistance for Career Pathways project staff to plan, design, develop, distribute, and support technical assistance communications and activities for members of the Career Pathways Exchange Network. The project will not use information from any other Federal agency databases.

The data will be broken into subsets so that targeted communications go to interested audiences based on members' personally-selected interest areas. Counts of interest area memberships may be used to influence the focus of future activities or communications.

## **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?*

The information is shared with OCTAE and OESE for project performance reporting purposes. Information shared includes number of registered members and counts of members subscribing to each interest area.

## **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?*

There is no sharing of this information outside of the sponsoring agencies.

## **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?*

Prospective members will be notified that by selecting the Consent Checkbox, they are acknowledging the fact that they have subscribed to a communications service and that they are authorizing the dissemination of communications regarding the interest areas to which they have subscribed to the email address that they have provided. Users electing not to select the Consent Checkbox will not be added to the member list as subscribers and will not receive any email. Members selecting the Consent Checkbox may begin to receive emails about the interest areas to which they are subscribed.

## **10. Web Addresses.**

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

The website [www.lincs.ed.gov](http://www.lincs.ed.gov) employs a link to the Department of Education's Privacy Policy.

## **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?*

The C&A for the LINCS.ed.gov has already been completed and the ATO has been granted.

Data collection will be accomplished through Google Docs and Google Drive technologies which require user authentication to get to the reposed information.

Information will be downloaded from Google to Kratos' internal secure networks for management of email subscriber lists in MS Access. Only project members with a need to know will have access to the database.

Emails and the subscriber recipient lists will be managed through Constant Contact. This online application also requires user authentication for access and only select project staff has access to the account.

## **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 this system under the provisions of Privacy Act, 5 U.S.C. 552a.

## **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:*

GRS 13 - Printing, Binding, Duplication, and Distribution Records, Item 4a:

4. Mailing Lists.

a. Correspondence, request forms, and other records relating to changes in mailing lists.

Destroy after appropriate revision of mailing list or after 3 months, whichever is sooner. (GRS 13, 1952, item 5a).