



Privacy Impact Assessment

For

Voluntary Student Engagement Form (V-SEF)

Date:

October 31, 2014

Point of Contact, System Owner, and Author:

Samuel Ryan

Sam.Ryan@ed.gov

**Office of Communications and Outreach
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.

ED's Office of Communications and Outreach (OCO), to better serve both communications efforts and recognize the voice of constituents served by grant programs, is developing a new tool to solicit information. The Voluntary Student Engagement Form, or V-SEF, would be used to gather data from students with whom Secretary Duncan or other high-level officials interact.

At this time, there is no process or method to solicit information from students who interact with high-level officials in the Department of Education. This lack of process is a barrier to the public better understanding how ED programs and policies are affecting youth and by amplifying the student experiences through various communications and outreach means we can better inform the public. It will also ensure that stakeholders who share their stories will receive a more apt response.

The overall objective of this form and corresponding database would be to collect the personal narrative and contact information of individual students, strengthening the 'megaphone' component of our Department by providing a youthful voice to bureaucratic policy operations.

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 U.S. Department of Education has legal authority through 20 U.S.C. Section 3412(e) (2) to perform public information functions, including the provision, through the use of the latest technologies, of useful information about education issues and related opportunities to students, parents, and communities. This is an inherently governmental function; according to the OMB Circular number A-130 Revised government information is seen as a "national resource."

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?

ED collects basic identifying and contact information including the student's name, home address (including city and state), school, and a contact person for the school and their position. If the student is eighteen years of age or older, they will be asked to provide their personal email address and phone number. If the student is seventeen years of age or younger, they will be asked to provide their parent's name, parent's email address and parent's phone number. The document will also collect a personal narrative or experience from the student.

The sources of information are students and/or guardians or school officials. Data will be collected electronically and paper-form and stored in an electronic format on the internal network of ED. The



information collected is not used to link or cross-reference multiple databases, but information can be shared amongst internal individuals in the Office of Communications and Outreach when conducting outreach efforts on behalf of the U.S. Department of Education.

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 will allow OCO to enhance the effectiveness of their communication and outreach plans and strengthen out communications development efforts.

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 Social Security Numbers (SSN) are collected by the Voluntary Student Engagement Form.

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 will be used within the Office of Communication and Outreach to provide resource materials for authors writing talking points, commencement speeches, or other published materials for senior-officials. Students will also be added to the ED Youth Voices Newsletter and possibly be contacted by OCO staff for future engagement opportunities.

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 database of records will be restricted to access by ED employees and contractors with a business need to see the information. Uses include entering forms into the spreadsheet, sending relevant newsletters, and retrieving information by location or ED priority; the file will be shared on a need-to-know basis and will be hosted on an internal shared server space.



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?

Selected information will be shared with the general public and other government agencies through the form of press releases, commencement speeches, talking points, or other productions of the Office of Communications and Outreach. This information will be used only with the consent of the students (or guardian/school official, in coordination with the student) that completed the form. In no way or form will the entirety of the database be available for public consumption.

A request could be made, however, for access to a specific narrative by another government agency on the basis that it would fit with the message of the U.S. Department of Education. In this instance, access will still be restricted to an ED employee or contractor and the singular record would be provided to a secondary government agency.

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?

Students (or guardian/school official, in coordination with the student) completing the Voluntary Student Engagement Form receive multiple opportunities when completing V-SEF to decline to participate. Participation is entirely voluntary, and this is made clear in the title of the document 'Voluntary Student Engagement Form.' It has a connotation that the document in itself is non-obligatory and the student has the right to decline participation.

The form, states that "this information will be cataloged by location and possibly used in the future for speechwriting or youth engagement purposes." This privacy notice at the beginning of the document, following the title that is labeled voluntary, notifies individuals what their collected information will be used for.

The form contains information that will be collected if the student is 18 years of age or older. This section is voluntary and would be completed by students that only fall within this age bracket.

The form contains information that will be collected if the student is 17 years of age or younger. This section is voluntary and would be completed by students that only fall within this age bracket.

On the form, it requests that the student check a box if contact is permissible. If the student checks said box, may follow up with them to further engage on this and other education issues and provide subscription to ED Youth Voices newsletter. If this box is not checked, ED still has consent to use the narrative they provide on the latter portion of the form.



10. Web Addresses.

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

Neither this document, nor electronic storage of this document will be maintained outside the local intranet.

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 U.S. Department of Education, like other federal agencies, has various controls and security measures in place to protect personally identifiable information. All physical access to ED sites is controlled and monitored 24/7 by contracted security personnel who ensure that all persons entering the building are properly authenticated and badged to enter the building.

Once a user passes multiple stages of physical security checks, U.S. Department of Education workstations employ a high degree of resistance to tampering and circumvention. ED passwords must have at least 8 characters, upper and lower case characters, at least 1 punctuation mark(s), at least 1 letter(s), at least 1 digit(s), not be an old password, and contain characters that can be typed on a standard English (US) keyboard. Beyond this level of protection for the workstation, users also comply with the Homeland Security Presidential Directive HSPD-12 and Office of Management and budget (OMB) Memoranda 06-16 and 07-16 by using a personal identity verification card to enhance access to the ED network and protection of sensitive computing resources.

The next level of protection is the Department's special software programs for monitoring network traffic to identify unauthorized attempts to upload or change information, or otherwise to cause damage to this government computer system.

Internally we will also have a locked folder where only authorized staff with a work justification to access the folder will be permitted.

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?

A system of record notice (SORN) is not needed because the information collected is not retrieved by any personal identifiers. Therefore, a system of record as defined by the Privacy Act is not being created, and the reporting requirements of OMB Circular A-130 do not apply.



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 ED 144.a. These records are destroyed when no longer needed for reference purposes, or according to a predetermined time period.