



**Privacy Impact Assessment  
for the  
Data Analytic System (ODAS)**

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Contact Point

System Owner: Office of the Inspector General

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U.S. Department of Education

**1. What information will be collected for the system (e.g., name, Social Security number, annual income, etc)?**

The Office of Inspector General Data Analytic System (ODAS) will contain personally identifiable information from a variety of individuals who have applied for and/or received grants, contracts, loans, and salary from the U.S. Department of Education (Department). Such individuals include: employees of the Department, consultants, contractors, grantees, advisory committee members, and others who receive funds from the Department for performing services; students applying for Federal student financial assistance; Pell Grant recipients; borrowers of William D. Ford Federal Direct Loans, Federal Family Education loans, Federal Insured Student loans and Federal Perkins loans; owners, board members, officials, and authorized agents of postsecondary institutions; and individuals applying for a Department personal identification number. The information maintained in the system includes: names, addresses, social security numbers, telephone numbers, e-mail addresses, bank account numbers, and dates of birth.

This system will contain records taken from other Department systems of records as follows:

- Education's Central Automated Processing System (EDCAPS) (18-03-02)
- Federal Student Aid Application Files (18-11-01);
- Recipient Financial Management System (the Department soon expects to amend this system and rename it as the Common Origination and Disbursement System) (COD) (18-11-02)
- National Student Loan Data System (NSLDS)(18-11-06)
- Student Financial Assistance Collection Files (18-11-07)
- Postsecondary Educational Participants System (PEPS) (System Number 18-11-09)
- The Department of Education (ED) PIN (Personal Identification Number) (18-11-12)
- Student Authentication Network Audit File (18-11-13)

**2. Why is this information being collected?**

This information is being collected so that OIG will have access to a single repository of data for purposes of conducting data modeling and predictive analysis.

**3. How will the Department of Education use this information?**

OIG will use this information to identify internal control weaknesses and system issues, and to improve methods of data analysis and annual audit planning. OIG will conduct data modeling on this information, using statistical and mathematical techniques, in order to predict anomalies indicating fraudulent activity. Under the Inspector General Act of

1978, as amended, 5 U.S.C. Appendix, Inspectors General, including OIG, are responsible for conducting, supervising, and coordinating audits and investigations, relating to programs and operations of the Federal agency for which their office is established. This system facilitates OIG's performance of this statutory duty.

**4. Will this information be shared with any other entity? If so, with whom?**

OIG may share this information with other entities. OIG may disclose information in this system under the routine uses listed in the System of Record notice for ODAS without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Specific disclosures may include the following:

- Federal, state, local or foreign agencies or law enforcement agencies
- Public or private entities when necessary to obtain other information
- Institutions, accrediting agencies, and guaranty agencies
- Litigation and alternative dispute resolution
- Contractors and consultants
- Debarment and suspension
- Department of Justice advice
- Congressional member
- Benefit program
- Collection of debts and overpayments
- President's Council on Integrity and Efficiency.

**5. Describe the notice or opportunities for consent that would be/or are provided to individuals about what information is collected and how that information is shared with others organizations. (e.g., posted Privacy Notice)**

There will be a Privacy Act System of Records notice for ODAS. For this system, information is not being collected directly from the data subjects, and the system will be accessible to only internal users within the OIG's Information Technology Audits and Computer Crimes Investigations unit. In addition, there are System of Records notices covering each system from which OIG will obtain information to include in ODAS.

**6. How will the information be secured?**

The information is secured in accordance with OMB M-03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, September 26, 2003, the E-Government Act, Section 208, Attachment A, and NIST 800-53, Revision 1, *Recommended Security Controls for Federal Information Systems*, December 2006.

- A. All information stored in this system is secured by utilizing database encryption technology and is resistant to tampering and circumvention by unauthorized users. Access to data by all users will be monitored using both automated and manual

- controls. The information is accessed by OIG staff on a “need-to-know” basis and intended systems usage basis.
- B. ODAS is developed and maintained by the OIG and is housed within a secure and controlled facility. Access to the computer lab is by authorized OIG personnel only. The general public does not have access to ODAS.
  - C. Interfacing systems from which data will be extracted and maintained are listed under paragraph 1. Individual certification and accreditation packages are required for each of the interfacing systems.
  - D. System administrators provide comparable security controls to protect the system and the information contained therein.

**7. Is a system of records being created or updated with the collection of this information?**

A system of records notification will be submitted in accordance with the Privacy Act, 5 U.S.C. 552a.