

## **Privacy Impact Assessment** for the

### **Education's Central Automated Processing System (EDCAPS)**

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

EDCAPS is the System that maintains financial and management records associated with the operation of the Department of Education. EDCAPS consists of three major components: Contracts and Purchasing Support Software (CPSS), Financial Management System Software (FMSS), and Grants Administration and Payment System (GAPS/G5). The records found within these subsystems are used to prepare financial statements and reconcile general balances with subsystems maintained in program areas and Treasury, manage funds, process grants and contracts, manage receivables, costs, and recipients, and perform administrative processes (e.g., purchasing, travel, and miscellaneous payments).

The CPSS and FMSS Subsystems do not collect any Personally Identifiable Information (PII). GAPS/G5 application collects the names, addresses, telephone numbers, Social Security Numbers, e-mail addresses, and bank account numbers of individuals receiving fellowship grants. The GAPS application component, e-Grants, collects names, addresses, telephone numbers and email addresses for user registration purposes.

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

The GAPS/G5 information is collected to facilitate grants administration and payments on behalf of the entity or individual submitting the information related to the Department of Education grants administration and payments.

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

GAPS/G5 supports grant planning pre-award, award management, and post-award of Department programs including discretionary, formula, and fellowship grants. GAPS/G5 also interfaces with other program office systems, referred to as program feeder systems, to process obligation and payment data. The program feeder systems typically support the planning, scheduling, and award processes performed by the program office to manage their programs (e.g., Campus-Based and Pell). GAPS/G5 also serves as a customer database for EDCAPS and the central repository of recipients having a relationship with the Department (e.g., receiving grants). GAPS/G5 also maintains core information about a recipient and tracks reference data to support information recipients (e.g., countries, states, and congressional districts). GAPS/G5 controls payments for the Department's programs, including payments for grants and direct loans, and other program-related obligations. GAPS/G5 interfaces with the FMSS general ledger for program-related obligations, payments, and expenditures. GAPS/G5 interfaces with FMSS at the summary level for funds control and general ledger postings.

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

Information, such as addresses and telephone numbers, is disclosed internally to Department of Education staff for peer reviews. However, it is not shared externally, except as required by law, or under the routine uses listed in the Privacy Act System of Records notice. Such disclosures may include: for litigation purposes, to the Department of Justice for FOIA advice, to contractors conducting Department business, for law enforcement, to a member of Congress at the request of the data subject, or to a consumer reporting agency regarding a valid and overdue claim.

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)

When we collect information from individuals, we provide the following notice to users regarding what information is collected and how that information is shared. This notice is found at: <a href="http://e-grants.ed.gov">http://e-grants.ed.gov</a>

You must read the statement below, and click "Continue" to access the Department of Education's e-Grants website. Some users may need to scroll to the bottom of the screen to see the "Continue" button.

This is a United States Department of Education computer system, which may be accessed and used only for official Government business by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action.

This system contains personal information protected under the provisions of the Privacy Act of 1974, 5 U.S.C. § 552a -- as amended. Violations of the provisions of the Act may subject the offender to criminal penalties.

Furthermore, the following Privacy policy statement is posted on-line:

Thank you for visiting <a href="http://e-grants.ed.gov/">http://e-grants.ed.gov/</a> portal web site and reviewing our privacy policy. Our policy is simple: We collect no personal information about you unless you choose to provide that information to us. We do not give, share, sell, or transfer any personal information to a third party.

Our web pages (such as e-Reader, e-Payments, e-Reports & e-Application) let you voluntarily submit personal information. In those cases, we will provide a specific notice before you begin submitting any personal information, explaining how your information will be safeguarded. You are not required to submit any personal information to browse our website.

If you want to know more about how we record non-personal information about your visit or how we use information that you voluntarily submit, read on.

#### Non-personal Information We Record

If you do nothing during your visit but browse through the Web site, read pages, or download information, our Web site's operating system will automatically record some general information about your visit.

During your visit, our Web operating system will record:

- 1. The date and time you visit our site
- 2. The Internet domain for your Internet service, such as "xcompany.com" or "xcompany.net" if you use a private Internet access account, or "yourschool.edu" if you connect from a college or university domain.
- 3. The login name that you used to access our site.
- 4. The address of the server that you accessed.
- 5. The action that you were trying to perform (i.e. Get a page to view, etc.)
- 6. The resource that was accessed (usually this is a web page)
- 7. The query, if any, that you were trying to perform.
- 8. If you were able to access the resource that you were trying to get too.
- 9. The number of keystrokes sent by the server
- 10. The number of keystrokes received by the server
- 11. How long it took the server to process your request
- 12. How your computer communicated with the server (usually this is going to be HTTP)
- 13. The content of the host header
- 14. The type of browser that you used
- 15. The content of the cookie that was sent or received (Note: Cookie is described below).
- 16. The address of the previous Web site you were visiting, if you linked to us from another Web site.

We use this information for statistical analysis, to help us make our site more useful to visitors and for security monitoring purposes. This tracking system does not record information about individuals.

#### Cookies

On certain <a href="http://e-grants.ed.gov/">http://e-grants.ed.gov/</a> portal web pages, we use "cookies" to help you use our web sites interactively. A cookie is a small file that a Web site transfers to your computer's hard disk, usually to keep track of you while you are connected to that site. The cookies on ED Web pages do not collect information about you, but only about your browser "session." The cookie makes it easier for you to use the dynamic features of these Web pages, without having to provide the same information again as you move from one page to another.

To protect your privacy, be sure to close your browser completely after you have finished conducting business with a web site that uses cookies. If you are concerned about the potential use of information gathered from your computer by cookies, you can set your browser to prompt you before it accepts a cookie. Most Internet browsers have settings that let you identify and/or reject cookies.

#### Information from E-mail You Send to Us

E-mail is not secure. Therefore, we suggest that you do not send personal information to us via e-mail. If you decide to send us an electronic mail message (e-mail), the message will usually contain your return e-mail address. If you include any personal information in your e-mail because you want us to address issues specific to your situation, we may use that information in responding

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to your request. In other limited circumstances, including requests from Congress or limited other parties, we may be required by law to disclose information that you submit. Also, e-mail is not necessarily secure against interception. Please send only information necessary to help us process your request.

#### **Information Collected from Interactive Forms**

On some of our Web pages we offer interactive forms that let you voluntarily submit personal information (such as your e-mail address, name, or organization). This occurs when you are registering, requesting user IDs or updating your user profile. In those cases, all submitted information is used only for the expressed purposes for which it is intended and is not made available to any third party.

#### **Privacy Act**

The Privacy Act of 1974, as amended at 5 U.S.C. 552a, protects records that can be retrieved from a system of records by personal identifiers such as a name, social security number, or other identifying number or symbol. (A system of records is any grouping of information about an individual under the control of a Federal agency from which information is retrievable by personal identifiers).

An individual is entitled to access to his or her records and to request correction of these records by stating the reasons for such actions with supporting justification showing how the record is untimely, incomplete, inaccurate or irrelevant. The Privacy Act prohibits disclosure of these records without written individual consent unless one of the twelve disclosure exceptions enumerated in the Act applies. These records are held in Privacy Act systems of records. A notice of any such system is published in the Federal Register. These notices identify the legal authority for collecting and storing the records, individuals about whom records will be collected, what kinds of information will be collected, and how the records will be used.

#### **Links to Other Sites**

Our policy discloses the privacy practices for this web site (<a href="http://e-grants.ed.gov/">http://e-grants.ed.gov/</a>); however, we do provide links to other Department of Education web sites as well as a limited number of non-Department of Education web sites. When you leave this web site (<a href="http://e-grants.ed.gov/">http://e-grants.ed.gov/</a>), you will be going to sites that are beyond our control. We try to ensure that links that leave our site are clearly labeled. These other sites may send their own cookies to users, collect data, or solicit personal information. The privacy policies and procedures described here for this web site do not apply to any external links. We encourage you to read the privacy policies of any site you link to from ours, especially if you share any personal information. Be informed. You are the person best qualified to protect your own privacy.

This is a United States Department of Education computer system, which may be accessed and used only for official Government business by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action. For site security purposes and to ensure that this service remains available to all users, this Government computer system employs automated software programs and manual analysis of computer system logs to identify unauthorized attempts to upload or change information and programs or otherwise cause harm.

Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits. Computer system logs are used for no other purposes. Unauthorized attempts to upload information or change information on this service are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act. This system contains personal information

protected under the provisions of the Privacy Act of 1974, 5 U.S.C. § 552a -- as amended. Violations of the provisions of the Act may subject the offender to criminal penalties. If you have any questions or comments about the information presented here, please forward them to us: <a href="mailto:edcaps.user@ed.gov">edcaps.user@ed.gov</a>

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

The information is secured following the guidance of OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," NIST 800-53 "Recommended Security Controls for Federal Information Systems" and Public Law 100-235, "Computer Security Act of 1987." The Grants Administration and Payment System (and subsystems) is a component of the Education Central Automated Processing System (EDCAPS), which is a major application requiring a system security plan (system security plans are required by OMB Circular A-130 Appendix III and Public Law 100-235, "Computer Security Act of 1987." The system security plan details the security requirements and describes the security controls that are in place to meet those requirements. Furthermore, the security controls are validated by a certification and accreditation process in accordance with the National Institute of Standards & Technology "Guide for the Security Certification and Accreditation of Federal Information Systems."

A brief summary of the security controls in place is listed below:

- Access to the EDCAPS system (and subsystems) is only available to authenticated users who have a valid system user ID and password.
- The logical boundaries of the EDCAPS system are protected by a combination of firewalls, intrusion detection systems, and event monitoring systems.
- Every EDCAPS System user is provided a copy of the Rules of Behavior prior to accessing the system.
- Passwords comply with the Department's password complexity policy.
- EDCAPS system servers are housed in environmentally controlled server rooms.

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

No, the authority for the Department to maintain these records is an existing system of records entitled EDCAPS - # 18-03-02.