

# Privacy Impact Assessment for the Endowment Financial Report System

Version 1.0

July 1, 2008

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U.S. Department of Education



### 1. What information will be collected for the system?

The U.S. Department of Education, Office of Postsecondary Education, Institutional Development and Undergraduate Education Service (IDUES), administers programs funded under Title III and Title V, and the Robert C. Byrd Honors Scholarship Program. Title III Aid for Institutional Development programs support improvements in educational quality, management and financial stability at postsecondary institutions that enroll large proportions of minority and financially disadvantaged students with low per-student expenditures. Title III Part A and Part B and Title V programs allow institutions receiving grant awards to use a portion of funds from those awards to build endowments. Institutions that use such funds to build endowments are required to submit annual financial status reports. The Title III Part C Endowment Challenge Grant Program is closed but still has a financial status reporting obligation for its outstanding grants. IDUES developed OMB Form 1840-0564 to collect the required financial reports. The IDUES Endowment Financial Report system provides grantee institutions that have relevant financial reporting obligations with an online method to submit form OMB 1840-0564 for the required financial reports. The information on the report includes contact information for the institutional representative who is submitting the report and the amount and type of investments, the amount of investment income and the amount and type of expenditures.

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

The legislation that authorizes the endowment activities of the above named programs requires grantee institutions to submit these financial reports that document how endowment monies are used (using form OMB 1840-0564). To date, the reports have been collected on paper. This format had very limited capacity for checking data, tracking submissions, and preparing management reports. This Endowment Financial Reports website, when used by grantee institutions, allows institutions to improve the quality of the data before submitting the reports, provides IDUES Program Officers with tracking information, and captures the data in a format to support IDUES or OPE management reporting.

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

IDUES will use this information to improve the tracking of whether grantees have complied with financial reporting requirements, and to obtain measurements of

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the ways in which grantees are accomplishing program goals with the endowment grant monies.

4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities?

The Endowment Financial Report application does not share information with any other agency or entity.

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 other organizations.

The information collected is that on OMB Form 1840-0564 which is intended to fulfill the financial reporting obligation that is part of the federal regulations for the endowment activities of the above named programs. Grantees are informed of this reporting obligation as part of the process of receiving grant monies.

No information except that on OMB Form 1840-0564 is collected.

No Privacy Act information is collected.

No privacy, confidentiality, or similar concerns affect the information on OMB Form 1840-0564 – it could be made available to the public

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

The system and its data will be accessible only to a small number of authorized users of the system. These include IDUES program officers, IDUES management, and the contractors who support the system. IDUES and contractor staff have the appropriate security clearances, complete security awareness training, and sign confidentiality and non-disclosure agreements.

A system security plan for this system has been developed in alignment with OMB and legal requirements. This plan details the security requirements and describes the security controls that are in place to meet those requirements.

Certification and Accreditation (C&A) is used to ensure that information systems have adequate security commensurate with the level of risk. The certification is a comprehensive evaluation of the technical and non-technical security features of

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an IT system and other safeguards (e.g., physical, personnel, procedural, and environmental) to establish the extent to which a particular design and implementation meet a set of specified security requirements. The accreditation is a formal declaration by a Designated Approving Authority (DAA) that an IT system is approved to operate in a particular security mode using a prescribed set of safeguards at an acceptable level of risk. The Endowment Financial Report complies with the Department's C&A policy.

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

No.

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