Privacy Impact Assessment

for

Grant Electronic Monitoring System (GEMS)

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1. System Information.

OPE's Grant Electronic Monitoring System (GEMS) is used by 150 staff to monitor approximately 6,000 grants. It has been in use since 2007. GEMS was the result of a redesign of an older system called e-Monitoring.

There is no public access for GEMS. It is an internal system for OPE staff. The system is being enhanced/extended to include electronic grant records ("e-folder"). The difference between the current system, which has no Personally Identifiable Information (PII) and the enhanced system, which has some limited PII is explained below.

Current

GEMS is currently hosted in the EDUCATE environment. GEMS accesses Grant Administration and Payment System (GAPS) information that is copied on a nightly basis to the ED Data Warehouse (EDW). This data feed includes the grant number, DUNS (institution) number, financial data, performance dates, and information on key personnel. The Program Oversight Staff, a team within OPE, adds in information on the accreditation of institutions and their A-133 audit information. Program Officers use that information to monitor grants and add in additional information documenting their monitoring, such as emails, goals and objectives, notes, and documents.

Upgrade

GEMS will be upgraded soon (after Perot provides a server and we go through Certification and Accreditation) to incorporate an e-folder component. The e-folder will contain the six mandatory folder components stipulated in the Department's *Handbook for the Discretionary Grant Process*. It will include documents such as the grant application, technical review forms, performance reports, grant award notifications, emails, and other required documents. The documents will be used to monitor grantee progress in fulfilling the purpose of their grants; justify the continuation of grants; satisfy GPRA and PART reporting requirements; measure performance outcomes; and respond to information requests from members of Congress, FOIA, OIA, and GAO. GEMS will be integrated with a new application: HP TRIM Context 6.2.2, a commercial-off-the-shelf records management application that will store all of these electronic grant documents.

2. Legal Authority.

The legal authority for GEMS is 44 U.S.C. 301.

3. Characterization of the Information.

Some grant applications, which will be copied from GAPS to GEMS, have SSNs and/or financial information. This applies to only a few of OPE's more than 60 grant programs. A few of those programs collect financial aid information from applicants, including their FAFSA, along with their names. Another one collects passport numbers and names, because the applicants travel abroad as part of the award.

The source of the information is the applicant, which can be either an institution or an individual. This information is collected in the application, which is submitted via the web through Grants.gov or e-Application uploads, and infrequently by mail.

The SSNs and financial information are not used to link or cross-reference multiple databases. The unique identifiers for the system include the grant award number and the DUNS number (which identifies the institution). Records are not based on individual information, but rather information about an institution. Users can search by a project director's name or contact information, but this includes the work contact information submitted as part of the application process, not any personal information.

4. Why is the information collected?

GEMS is not actually collecting the SSNs, financial information, or passport numbers. These are being collected through the grant application process by Grants.gov or e-Application. This information is then stored in GAPS. We are then copying it over to GEMS so that we have an electronic record. This will save the cost and time of printing up the applications and archiving them in paper form.

The information that is being stored in GEMS is necessary for these few programs to determine eligibility for their grant programs and also to implement the programs. The social security numbers and financial information are necessary for identifying individuals who can receive fellowships. The passport numbers are necessary for making travel arrangements.

Any applications with this data in GEMS will be restricted so that the only user that can view those documents is the program officer and team leader assigned to the grant. All other users will be blocked from accessing the documents.

The system that stores the documents, TRIM, has been certified according to DOD 5015.2-STD *Design Criteria Standard for Electronic Management Software Applications*. It also meets the ACS Directive on Records and Information Management (OM: 6:103) and the ED Records Retention Schedule for Grants (OM:6-106-G79, currently being revised). The system will also go through Certification and Accreditation (C&A) once it is tested and ready for implementation.

5. Social Security Numbers

GEMS is not actually collecting the SSNs, financial information, or passport numbers. These are being collected through the grant application process by Grants.gov or e-Application. This information is then stored in GAPS. We are then copying it over to GEMS so that we have an electronic record. This will save the cost and time of printing up the applications and archiving the in paper form.

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6. Uses of the Information

As described in #4 and #5, the information is used to determine an applicant's eligibility for the grant. The application then serves as an official part of the grant record, as required by the Department's *Handbook for the Discretionary Grant Process*. It is an official record that then has to be archived for five years after the performance end date.

The data is only used internally, not externally. It will not be shared with any other agencies, or any other principal offices within the Department. The documents containing SSNs, financial information, or passport numbers will be restricted to the program officer and team leader assigned to that grant. So other users within OPE cannot access the information.

7. Internal Sharing and Disclosure.

The data is only used internally, not externally. It will not be shared with any other agencies, or any other principal offices within the Department. Only a few contractor staff have access to the system and they have the appropriate security clearances. The documents containing SSNs, financial information, or passport numbers will be restricted to the program officer and team leader assigned to that grant. So other users within OPE cannot access the information.

For the few programs that have this information in their applications, their applications will be flagged in GEMS as being restricted. This is done by categorizing all records uploaded as a specific document type. One document type is application. For these particular CFDAs, their application will be designated as restricted. No other users can open the documents. Additionally, if a program officer uploads any record into the system, they are given the opportunity to designate it as having PII, which will then restrict access as well.

8. External Sharing and Disclosure.

The data is only used internally, not externally. It will not be shared with any other agencies, or any other principal offices within the Department. The documents containing SSNs, financial information, or passport numbers will be restricted to the program officer and team leader assigned to that grant. So other users within OPE cannot access the information.

9. Notice.

The privacy notice can be located at http://e-grants.ed.gov/

10. Security.

Mandatory annual self-assessment is performed. The GEMS system was certified and accredited on October 26, 2007.

The system that stores the documents, TRIM (which serves as the backend for GEMS), has been certified according to DOD 5012.2-STD *Design Criteria Standard for Electronic Management Software Applications*. It also meets the ACS Directive on Records and Information Management (OM: 6:103) and the ED Records Retention Schedule for Grants (OM:6-106-G79, currently being revised).

TRIM has monitoring and auditing capabilities. GEMS is hosted by EDUCATE, so it is within the Department's firewall and has all the associated security protections. The system will also go through Certification and Accreditation (C&A) once it is tested and ready for implementation.

11. Privacy Act System of Records.

The information in GEMS is collected from GAPS which is covered under Education's Central Automated Processing System (EDCAPS), System of Record # 18-03-02, dated 4 June 1999 (64 30114-30116).

12. Records Retention and Disposition.

Yes. It is currently ED/RDS, Part 10 Item 3a (NC-12-75-1, Item 20a). The records retention schedule being revised by RIMS, but not yet approved is OM:6-106-G79. Discretionary grant records are required to be archived for five years after the performance end date. GEMS will comply with this requirement.