Privacy Impact Assessment

For

TEACH Supplemental Data Collection

Date:

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Point of Contact:

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System Owner:

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1. <u>System Information.</u> **Describe the system** - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

The system is a web-based interface where financial aid administrators will log in to provide CIP Codes and Cost of Education information for TEACH recipients. The scope of the collection is one year with the possibility of a second year if the option is exercised on the contract. After that the collection will become a regular part of the data collection that is done. The purpose and major function are to collect these two pieces of data for TEACH recipients which is currently not being done. The data is needed as an integral part of a report that will go to Congress.

2. **<u>Legal Authority.</u> Cite the legal authority to collect and use this data.** What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

Mandated in Section 420P of the Higher Education Act, as amended by the Higher Education Opportunity Act of 2008.

3. **<u>Characterization of the Information</u>. What elements of 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?

The system stores date of birth information. The source of the information will be the financial aid administrators at each institution. The information will be collected through a log in based website. The data will not cross-reference multiple databases.

4. **<u>Why is the information collected?</u> 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 Office of Postsecondary Education (OPE) is requesting institutions, that administered the TEACH Grant Program during the 2008-09 Award Year, to provide student level data to aid in the Department's requirement to submit an annual progress report to Congress.

5. **<u>Social Security Numbers</u> - 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.**

SSN will NOT be used in this collection

6. **<u>Uses of the Information</u>. 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? If the system uses commercial information, publicly

available information, or information from other Federal agency databases, explain how it is used.

The information is being used to provide student level data to aid in the Department's requirement to submit an annual progress report to Congress.

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 financial aid administrators' will only have access to their grant information , OPE staff, and the contractor (CBMI) which designed and maintains the TEACH SDC system.

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 wit another agency?

The information will be shared with the contractor (CBMI) which designed and maintains the TEACH SDC system.

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?

A system of record notice is not needed because the information collected from SecurityTouch is not retrieve 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.

10. **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 system compliance office (Information Assurance) is in the process of validating federal security requirements that apply.

11. **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 is not needed because the information collected from TEACH SDC is not retrieve 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.

12. **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:

The records will be handed over to Department of ED staff and will be stored with ED staff. The collection is only for this year with an option for a second year and after that the collection will end since it will become part of a regular collection with the Dept of ED. The information will be retained her at the Department of Education and will become part of the data that will be collected going forward.