

Privacy Impact Assessment For

**You for Youth
Professional Development Web Portal**

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Point of Contact

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21st Century Community Learning Centers

Office of Elementary and Secondary Education

U.S. Department of Education

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

You for Youth (Y4Y) is a website designed to provide high-quality professional development learning modules for more than 100,000 afterschool professionals in the U.S. Department of Education's (ED's) 21st Century Community Learning Centers (21st CCLCs). The website will be an ed.gov public website that will not require users to register in order to access the professional development learning modules.

The function of Y4Y is to provide online professional development learning modules and coaching materials, as well as technical assistance, to support the goals of 21st CCLCs. The learning modules will be self-contained, sequential learning experiences; each will be approximately 30 minutes long. Modules are designed to provide in-depth understanding of what each of the module topics are and why they are important. Y4Y will consist of five modules offered to users (Project-Based Learning, Aligning with the School Day, Strengthening Partnerships, STEM Curriculum, and Parental Involvement). They will include text and multimedia content, including interactive activities, to support the learning objectives. In addition, users will have a notebook space for taking notes and can access links to a "Learn More Library" of additional resources for the module they are in. Users will also have the opportunity to explore how to implement what they have learned at their own project sites, and download helpful materials to facilitate implementation through the Coaching and Design Studio features of the website. In the Exchange area of the website, Y4Y will promote exchange, interaction and idea sharing among 21st CCLC staff members nationwide as part of their professional development.

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

The proposed information collection will be conducted as part of the 21st CCLC program, which is a formula grant program funded through CFDA 84.287 by ED. It is authorized under Title IV, Part B, of the Elementary and Secondary Education Act of 1965 (ESEA), as amended. 21st CCLC programs serve children from preschool through grade 12.

3. Characterization of the Information. 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, online form)? Is the information used to link or cross-reference multiple databases?

The system collects name, user name, password, e-mail, home state, position, program affiliation (21st CCLC or other), profile photo and interests. A user always has the option of browsing most of the Y4Y site without ever having to register. However, unregistered users will not have access to areas of the website in which information is collected or shared among users. Listed below are the areas on the Y4Y site that will collect information from users, as well as areas that allow the option of collecting data from nonregistered users if they choose to enter their information. Information provided is done so voluntarily.

Initial Site Registration is for users who wish to register. Limited types of personally identifiable information (PII) will be collected throughout the registration process. Although certain types of PII are optional, user name, e-mail and password are not. Users will need to create a user name and password that will be used to identify them throughout the website. Passwords will consist of 15 characters and will need to be changed every 30 days.

The Exchange section of the website, which is shared by the Coaching Module and the Design Studio, will have the interactive features described below:

The Live Moderated Discussion Panels will utilize the webinar functionality provided by ED.

User Discussion Boards/Forums will allow users to create, respond to, and search posts.

The Gallery will allow users to submit, receive feedback on, and search user-submitted content, which may include images, videos, Microsoft Word documents, Excel templates, and PowerPoint documents. It should be noted that users could potentially post images, video, or other content with likenesses of themselves or other individuals affiliated with their programs and could potentially post text identifying themselves or others, subject to the terms of use described in the privacy notice.

Program Profiles will allow users to create profiles of the 21st CCLC programs with which they are affiliated. These profiles will primarily consist of information entered in pre-established templates but may also include images or videos. Registered users can create or search profiles. Users would have the option to enter contact information for their programs, which may include the name, e-mail address, physical address, and phone number for themselves or other individuals affiliated with the program, such as the program director.

Program Spotlights will allow users to contact the program director or other program staff members to obtain additional information about the program (if that program has provided contact information in its program profile).

Activities or Challenge Scenarios will allow registered users to participate in activities or challenge scenarios that appear throughout the website and its learning modules. These may be presented in a variety of forms, but will be associated with the registered user's chosen user name and will not collect any further PII. Users can write responses to the activities and challenge scenarios that may be shared in the Gallery.

The Notebook feature will provide users with a space for an ongoing written log in which they may take notes. Users will be able to save the notes, return to them at any time, and print the notes as needed. Each notebook will be specific to each module and will not collect any additional PII.

The Comments/Suggestions option will allow users to provide feedback and suggestions for any of the Y4Y content. Comments may be left without any PII, though users have the option of leaving a name and e-mail address in order to receive a response to their feedback.

The Page Ratings feature will allow for anonymous rating of the page, using either a “Like it” button or a numerical rating scale. No PII will be collected for pages to be rated.

4. **Why is the information collected?** How is this information necessary to the mission of the program, or contribute 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 information collected on the Y4Y site is collected as follows: (1) to identify users by their selected user names and to authenticate users during login, and (2) to provide contact information for those users who create program profiles and who choose to share their contact information within those profiles. This information is necessary to Y4Y’s mission to promote exchange, interaction, and idea sharing among 21st CCLC staff members nationwide as part of their professional development. PII will be collected from users at the time of their initial site registration. Some interactive features and the impact they have on database security is not known at this time but should have minimal impact on data structure and design, given that all PII should be collected prior to site use. At the time of registration, a unique identifier will be generated for each user to allow for anonymous tracking of users throughout the training/site usage process; however, such database interaction will be monitored at the time of module creation to minimize the security impact. The Y4Y website will not share any data with other applications. The “privacy page” will dictate what type of information is not allowed to be posted on the Y4Y site, such as images with people who did not provide consent, images of homes, images of license plates and so forth.

5. **Social Security Numbers.** 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.

The Y4Y website will not collect Social Security numbers.

6. **Uses of the Information.** 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 collected is the minimum amount of information necessary in order for a user to engage in the social networking (professional interaction) aspects within the Y4Y website. Users will be identified in the Y4Y website by their user names only unless a user specifically chooses to post contact information as part of his or her program profile. There will be no uses or analysis of the information beyond the Y4Y website and its features. Information provided is done so voluntarily.

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?

This information is not shared with other internal divisions within ED.

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 with another agency?

Information collected is not shared with external entities.

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 privacy notice will be posted on the website, explaining the use of information and the information use and collection practices for Y4Y. However, users will have the option to view most of the Y4Y content without ever having to provide any information whatsoever. Although it is optional, registration on the Y4Y site is the primary means by which PII will be collected. Registration is required for participation in any of the interactive elements, including user profiles/registration, discussion boards, program profiles, activities/challenge scenarios, discussion panels/webinars, module notebooks (that can be saved and returned to, as these rely on the user logging in), and the sharing of responses to activities in the Gallery. Users will have no access to these interactive elements without logging in as a registered user.

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?

C&A has not been done on this system because the system does not yet exist. Synergy Enterprises, Inc. (SEI), the developer of the site, will be scheduled for the C&A process following the Privacy Impact Assessment, and will meet all specifications for security safeguards required for ed.gov websites. Previously, SEI has received a C&A for a site developed for the Nuclear Regulatory Commission, which included physical security certification for SEI headquarters. SEI will include data watch monitored access, systems monitoring, and a CISCO 2901 firewall and separate subnets to isolate systems. Host-based intrusion prevention (HIPS) protection will be instituted through both the physical CISCO 2901 and through software using Trend Micro. System, administration, and security audit logs will be reviewed monthly, or more frequently should it be warranted, and adverse reporting will be submitted to the agency ISSO and security teams. Upon completion of the C&A process, the security description for this Privacy Impact Assessment will be updated and amended.

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 (SORN) is not needed because the information collected from Y4Y is not retrieved 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.

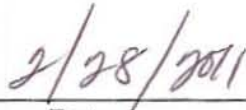
12. **Records Retention and Disposition.** Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes provide records schedule number:

ED schedule number 086/GRS 20, Item 2, Information Systems Supporting Materials: Computer files or records containing uncalibrated and unvalidated digital or analog data collected during observation or measurement activities or research and development programs and used as input for a digital master file or database. Temporary files will be deleted after necessary data have been incorporated into a master file.

Certifying Officials' Signatures:



Senior Program Official



Date



**Computer Security Officer/Information System
Security Officer**



Date

For systems that collect, maintain and/or transfer SSNs:

Assistant Secretary or Designee

Date

Privacy Advocate

Date