



Privacy Impact Assessment

For

Impact Evaluation of Mandatory-Random Student Drug Testing

Date

March 30, 2007

System Owner:

Dr. Ricky Takai

Office of Institute of Education Sciences
U.S. Department of Education

1. What information will be collected for the system?

The system will contain information about two cohorts of approximately 200 high school students each of (i) 26 high schools operating the mandatory-random drug testing program, and (ii) 26 high schools that will not operate the program but that will serve as control high schools for this evaluation. The total number of high school students included in this system of records will be approximately 10,400 for each of school years 2006-07 and 2007-08. The 52 participating high schools will be from school districts that are recipients of the grants for School-Based Student Drug-Testing Programs that were announced in September, 2006 by OSDFS. The system of records will include information about the high school students participating in the evaluation, including the students' names; addresses; demographic information such as race/ethnicity, gender, age, educational background; and attitudes and beliefs concerning substance use, and substance use itself.

2. Why is this information being collected?

The information in this system is used for the following purposes: To study the impact of mandatory-random drug testing policies in high schools and to determine if mandatory-random drug testing policies result in less reported use of tobacco, alcohol, and illicit substances among a group of students in participating high schools compared to a comparable group of students in high schools that do not operate a mandatory-random drug testing program.

3. How will the information be used?

The system will contain information about two cohorts of approximately 200 high school students each of (i) 26 high schools operating the mandatory-random drug testing program, and (ii) 26 high schools that will not operate the program but that will serve as control high schools for this evaluation. The total number of high school students included in this system of records will be approximately 10,400 for each of school years 2006-07 and 2007-08. The 52 participating high schools will be from school districts that are recipients of the grants for School-Based Student Drug-Testing Programs that were announced in September, 2006 by OSDFS. The system of records will include information about the high school students participating in the evaluation, including the students' names; addresses; demographic information such as race/ethnicity, gender, age, educational background; and attitudes and beliefs concerning substance use, and substance use itself.

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

Information is disclosed internally to administer the program. 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. These disclosures may be made on a case-by-case basis, or if the Department has complied with the computer matching requirements of the Act, under a computer matching agreement. 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 other organizations.

There is not notice or opportunities for consent since information is provided voluntarily.

6. How will the information be secured?

All physical access to the Department's site and to the sites of the Department's contractor and subcontractor, where this system of records is maintained, is controlled and monitored by security personnel. The computer system employed by the Department offers a high degree of resistance to tampering and circumvention. This security system limits data access to department and contract staff on a "need to know" basis, and controls individual users' ability to access and alter records within the system. The contractor and subcontractor will establish similar sets of procedures at their sites to ensure confidentiality of data. Their systems are required to ensure that information identifying individuals is in files physically separated from other research data. The contractor and subcontractor will maintain security of the complete set of all master data files and documentation. Access to individually identifiable data will be strictly controlled. At each site all data will be kept in locked file cabinets during nonworking hours, and work on hardcopy data will take place in a single room, except for data entry. Physical security of electronic data will also be maintained. Security features that protect project data include: password-protected accounts that authorize users to use the contractor's and subcontractor's systems but to access only specific network directories and network software; user rights and directory and file attributes that limit those who can use particular directories and files and determine how they can use them; e-mail passwords that authorize the user to access mail services; and additional security features that the network administrators will establish for projects as needed. The contractor and subcontractor employees who "maintain" (collect, maintain, use, or disseminate) data in this system shall comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).

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

The system is covered under the system of records notice Impact Evaluation of Mandatory-Random Student Drug Testing, dated March 30, 2007, (72 FR 15129-15131)