



## **Privacy Impact Assessment**

For  
**IES Data Center (IESDC)**

Date:  
October 30, 2014

Point of Contact:  
**Ed Vaden**

Ed.Vaden@ed.gov

System Owner:  
**Brian Taylor**  
Brian.Taylor@ed.gov

Author:  
**Ed Vaden and Marilyn Seastrom**  
Marilyn.Seastrom@ed.gov

**Office of Institute of Education Sciences (IES)**  
**U.S. Department of Education**



## 1. System Information.

*Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.”*

The IES Data Center (IESDC) hosts IES survey collection and data dissemination websites. Applications hosted in this cloud hosted data center support the four Centers in IES:

- National Center for Education Evaluation and Regional Assistance - NCEE
- National Center for Education Research - NCER
- National Center for Education Statistics - NCES
- National Center for Special Education Research –NCSER

The IESDC also hosts survey collections and data dissemination websites for the Office of Postsecondary Education (OPE). These OPE websites are related to Integrated Postsecondary Education Data System (IPEDS) websites. IPEDS is part of NCES.

The data hosted in IESDC are covered by existing PIAs and OMB Clearance Packages.

## 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?*

IES is authorized in law under Title 20 – EDUCATION, CHAPTER 76 - Education Research, Statistics, Evaluation, Information, and Dissemination, Subchapter I – Education Sciences Reform Act of 2002.

## 3. Characterization of the Information.

*What elements of personally identifiable information (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 various data collections include information on educational outcomes, student assessments, education program offerings and program participation, staffing, qualifications of staff, individual characteristics (e.g., age, race/ethnicity, gender), salaries, SSN's in longitudinal studies for tracking and record linkages to administrative data. Data are collected on students in grades Pre-K through 20 or beyond, parents of students, teachers, school administrators, and childcare providers.

## 4. Why is the information collected?

*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 Institute of Education Science is expected to provide national leadership in expanding fundamental knowledge and understanding of education from early childhood through postsecondary study, in order to provide parents, educators, students, researchers, policymakers, and the general public with reliable information about— the condition and progress of education in the United States, including early childhood education and special education; educational practices that support learning and improve academic achievement and access to educational opportunities for all students; and the effectiveness of Federal and other education programs. All public access data have been approved for release by IES senior management, based upon the analysis and recommendations from the IES Disclosure Review



Board. Each data license with an approved qualified researcher includes a description of the planned research and a statement explaining why publicly available data are not sufficient for the proposed analysis. In addition, in those instances in which data are made available for analysis through the use of an on-line analysis tool, internal controls are programmed into the analysis tool to avoid potential disclosure of any identifying information (e.g., the suppression of small cells, limitations on the specific types of analyses available, constraints on the publication of unrounded, unweighted N's, and electronic protections of the underlying data).

The use of direct identifiers is minimized to the fullest extent possible. In national student assessments, the student names are removed before the data collection instruments leave the school. IES has a well-established Disclosure Review Board that reviews disclosure avoidance analysis plans for each data set before any data are cleared for release as public use data or as data with access restricted to qualified researchers. All direct identifiers are removed from each data file, data are coarsened, sensitive variables are removed from public releases, the data are perturbed to insure that no individual respondent can be identified in a data file with certainty. The restricted access data are only loaned to qualified researchers who agree to the terms of a data license with IES. The license process includes the use of a legally binding agreement with each licensee's institution or organization, affidavits of nondisclosure from each authorized data user on an individual data license, a detailed security plan that specifies the physical and electronic conditions under which data use is permitted, participation in unannounced security/compliance inspections, and the submission of all work products to IES for disclosure review prior to release to anyone not permitted access to the data through the researcher's license agreement..

## 5. Social Security Number (SSN).

*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's are collected with OMB concurrence for the express purpose of record linkage with Department records systems and in some cases, for sample surveys, state or local student records. In the case of longitudinal studies, the SSN's may also be used for tracking study respondents as they change schools and/or geographic locations over the course of the study (e.g., to be able to follow study respondents as they complete high school and transition to the work force or postsecondary education or to follow study respondents as they transition from the completion of a baccalaureate program into the work force or additional higher education.

NCES keeps abreast of studies that focus on the use of names for such linkages and follow-up studies, but the return rate on matches based only on name are substantially lower than that obtained through the use of SSN's.

## 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? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.*

The IESDC hosts publicly available data on publicly accessible websites. It also hosts IES survey collection websites. Restricted access is provided by a data licensing program, not through the IES Data Center. Restricted access data are shared for the educational research and analysis that is



consistent with the intended use of the specific data file. The IES data licensing program is extended only to qualified researchers at institutions in the United States. The license is between IES and the qualified researcher and their institution. IES does not license individuals not affiliated with an established research firm or educational institution.

## **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?*

Public access data include disclosure avoidance protections and may be shared with the general public, including other Offices in ED. Restricted access data are shared with staff in ED and other federal agencies through a Memorandum of Understanding that mirrors the requirements described above for the data licensing program.. This program is not part of the IES Data Center.

## **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?*

All public access data have been approved for release by IES senior management, based upon the analysis and recommendations from the IES Disclosure Review Board. Each Memorandum of Understanding (MOU) with another federal program and each license with a qualified external researcher includes a description of the planned research and a statement explaining why publicly available data are not sufficient for the proposed analysis. The MOU/License process includes the use of a legally binding agreement with the other federal office, agency or institution; affidavits of nondisclosure from each authorized data user on the MOU/License; verification that the computer system on which the data will be used has a full certification and accreditation in the case of a federal agency, alternatively verification that the data will only be used on a standalone computer in the case of a license; participation in unannounced security/compliance inspections; compliance with IES reporting standards for the specific data file; and the submission of all work products to IES for disclosure review prior to release to anyone not permitted access to the data through the researcher's MOU/license agreement.

## **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?*

Every IES data collection has a System of Records Notice. In the case of surveys conducted in educational institutions advance letters are sent to the administrator for the institution, describing the study, explaining the voluntary nature of the study, and describing the pledge of data confidentiality. In addition, every IES data collection that includes individually identifiable information includes a description of the voluntary nature of the data collection and a pledge of confidentiality, per OMB standards and NCES Statistical Standard 4.2. The text of the confidentiality pledge includes the



following: Your answers may be used only for statistical or research purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law.

Furthermore, the routine statistical purposes for which the data may be used must be explained. If an individual educational institution requires informed consent from parents or adult students, that is included in the data collection procedures, otherwise each respondent is informed of the voluntary nature of their participation as it applies to both the entire data collection and to individual questions within the data collection. All respondents are informed of the voluntary nature of each data collection. In the event of legally mandated participation in a data collection, the data provider (usually a representative of an institution) is provided a description of the legal requirement and any data protections that are afforded are provided. (at the present time all IES data collections that are mandated in law involve the collection of data for a specific institution, rather than data for individuals), if the institutional data include data that are potentially disclosive of individual characteristics IES uses professional best practices to protect the identity of individuals in an institution when publishing data from the collection. Uses permitted for the data from a specific data collection are limited to the uses described in the System of Record Notice and provided to the respondent at the time of data collection, the respondent has the right of refusal on any or all of the questions used in the data collection. IES does not include provisions that allow a user to provide the information to IES but prohibit its use by other qualified researchers.

## 10. Web Addresses.

*List the web addresses (known or planned) that have a Privacy Notice.*

**Surveys.nces.ed.gov**

**Surveys.ope.ed.gov**

**Ies.ed.gov**

**Nces.ed.gov**

## 11. 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 IESDC has undergone FISMA Moderate Certification and received an ATO on March 12 2014. There are multiple layers of firewalls, an Intrusion Detection System, Einstein Monitoring, and monthly security scanning. IESDC is hosted in Amazon GovCloud which is FEDRAMP certified.

## 12. 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?*

The information in the IESDC includes the following SORNs:

*National Center for Education Statistics Longitudinal Studies and the School and Staffing Surveys*

Federal Register Date                      June 4, 1999

SORN Number                                    [18-13-01](#)



*National Center for Education Statistics Affidavits of Nondisclosure*

Federal Register Date June 4, 1999

SORN Number [18-13-02](#)

*National Center for Education Statistics National Assessment of Educational Progress*

Federal Register Date June 4, 1999

SORN Number [18-13-03](#)

*Education Publications Center*

Federal Register Date December 27, 1999

SORN Number [18-13-05](#)

*What Works Clearinghouse Database*

Federal Register Date March 1, 2004

SORN Number [18-13-06](#)

*DC Choice Program Evaluation*

Federal Register Date April 23, 2004

SORN Number [18-13-07](#)

*Even Start Classroom Literacy Interventions and Outcomes Study*

Federal Register Date December 6, 2006

SORN Number [18-13-09](#)

*Evaluation of the Impact of Supplemental Literacy Interventions in Freshman Academies (The Adolescent Literacy Project)*

Federal Register Date June 24, 2005

SORN Number [18-13-12](#)

*Impact Evaluation of a School-based Violence Prevention Program*

Federal Register Date October 2, 2006

SORN Number [18-13-15](#)

*Evaluation of Conversion Magnet Schools*

Federal Register Date August 31, 2007

SORN Number [18-13-18](#)

*Adult English as a Second Language (ESL) Literacy Impact Study*

Federal Register Date April 25, 2008

SORN Number [18-13-19](#)

*Impact Evaluation of Title I Supplemental Educational Services*

Federal Register Date January 16, 2009

SORN Number [18-13-20](#)

*Evaluation of Moving High-Performing Teachers to Low-Performing Schools*

Federal Register Date March 24, 2009



SORN Number [18-13-21](#)  
*Teacher Survey Response Incentive*  
Federal Register Date April 28, 2009  
SORN Number [18-13-22](#)  
*National Longitudinal Transition Study-2 (NLTS2)*  
Federal Register Date November 3, 2009  
SORN Number [18-13-23](#)  
*Evaluation of Teacher Residency Programs*  
Federal Register Date April 5, 2011  
SORN Number [18-13-24](#)  
*Predoctoral Survey, Postdoctoral Survey, Special Education Postdoctoral Survey*  
Federal Register Date October 24, 2011  
SORN Number [18-13-25](#)  
*Records-Principal Investigator/Application File and Associated Records*  
Federal Register Date October 12, 2012  
SORN Number [18-13-26](#)  
*National Longitudinal Transitions Study 2012*  
Federal Register Date April 27, 2012  
SORN Number [18-13-27](#)  
*Study of Promising Features of Teacher Preparation Program*  
Federal Register Date June 28, 2012  
SORN Number [18-13-29](#)  
*Evaluation of Response to Intervention Practices for Elementary School Reading*  
Federal Register Date May 9, 2013  
SORN Number [18-13-30](#)  
*Evaluation of the Pell Grant Experiments Under the Experimental Sites Initiative – 2012*  
Federal Register Date January 8, 2013  
SORN Number [18-13-31](#)  
*Impact Evaluation of Race to the Top and School Improvement Grants*  
Federal Register Date October 12, 2012  
SORN Number [18-13-32](#)  
*Free Application for Federal Student Aid (FAFSA) Completion Study*  
Federal Register Date March 15, 2013  
SORN Number [18-13-34](#)



*Impact Evaluation of Math Professional Development*

Federal Register Date July 12, 2013

SORN Number [18-13-35](#)

**13. 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:*

Records retention and disposition is documented in the individual SORNs; see question 12.