Privacy Impact Assessment

for

OCO Regional Office Contact List

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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.

The Office of Comm unications and Outreach in all regional offices are updating its stakeholder contact lists to a hybrid of MS Outlook and MS Excel. Regional Office Contact List objectives are to efficiently and effectively distribute ED information to key constituencies via a contact list in MS Excel and/or MS Outlook. MS Outlook or MS Excel will be used to disseminate information regarding ED grants, programs, initiatives, or policies to interested parties through the Regional Office Contact List. Headquarters can also utilize this information if they need to distribute information to a key constituency. In the past, regional offices have only utilized one of these applications, but by combining the two applications, it allows for a greater utilization of the information that is collected. Currently the regional offices receives contact information in three different ways: constituents call the Regional Office requesting to be added to the distribution list, constituents sign up at events, and public or political officials may receive the distributed information.

Under the new system, this information will be collected from the different methods described above and either entered into MS Outlook, a regional office shared inbox contact list, or entered into an MS Excel workbook. All of the information obtained, will be added into the corresponding fields and a notes section will allow regional officers to place pertinent information. For instance, how this individual was added into the contact list and when this addition occurred. Each contact must provide his or her name and email address, and must indicate a category of interest. This will determine the scope of information they will receive from ED. If the contact grants permission, ED will also collect a phone number, address, and organization as well.

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?

ED has authority through 20 U.S.C. Section 3412(e) (2) to perform public information functions, including the provision, through the use of the latest technologies, of useful information about education and related opportunities to students, parents, and communities.

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 the information is collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

The information that ED is collecting is: name, organization, email address, phone number, address/zip code and city. ED will keep the contact list on MS Outlook and MS Excel.

The information is collected from individuals requesting to receive information from the regional office regarding grants, pertinent education policies, ED outreach events in their community and other information deemed pertinent by senior leadership.

The information is collected in three different ways: constituents call the Regional Office requesting to be added to the distribution list, constituents sign up at events, and public or political officials may receive the distributed information as well.

The information is not used to link or 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 information is collected so the ED regional staff can disseminate information and interact with key stakeholders. Also, this information is utilized as an assessment tool to identify where the regional offices efforts have been targeted, either in direct outreach or through the contact list, in order to maintain a productive network of contacts.

The regional offices will collect contact information such as email addresses in order to disseminate information to interested stakeholders. In order to ensure that these contacts are receiving information they desire, categories have been created. If individuals are looking for specific pieces of information, such as grants, the regional offices are able to send the desired information straight to the select group instead of emailing the whole contact list. As stated above, typically the information disseminated through the contact list is grant information, pertinent education policies, ED outreach events in a community and other information deemed pertinent by senior leadership. We are also collecting addresses in order to understand the demographics of those interested in ED's programs, so that we can better design outreach strategies. Although there is a small privacy risk in collecting this data, it has been properly mitigated with security and data handling measures as discussed below.

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.**

No Social Security Numbers are collected.

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.

As stated above, the information will be utilized for communicating to and outreaching with stakeholders in an effective and efficient manner. The information collected will also allow OCO to enhance the effectiveness of our communication and outreach plans. The only publically available information that this system may utilize is the contact information for governmental stakeholders like state superintendents and media contacts. These contacts will be treated like any other contact within the contact list.

7. **<u>Internal Sharing and Disclosure</u>. With which internal ED organizations will the information be shared?** What information is shared? For what purpose is the information shared?

The information would be shared among regional offices and OCO for the purposes of systematizing distribution methods and locating redundancies, disseminating information to these contacts and determining areas to increase communication and outreach. In terms of determining how to increase communication, the information that would be shared is the organization, address, category, and notes the regional staff compile. This will be shared internally on a need to know basis.

Periodically the regional offices will export its contact list to MS Excel where it will be stored so headquarters can compile them from each region and use the information to increase the effectiveness of our communication and outreach plans. This data would be used to enhance the effectiveness of our communication and outreach plans by allowing us to geographically identify who our message is reaching and what type of interactions have occurred within the respective regions.

8. **<u>External Sharing and Disclosure</u>. 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?

This information will not be shared externally with individuals or organizations.

9. **<u>Notice</u>. 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?

Individuals will only be added to the contact list if they request it. Participation is entirely voluntary. At the initial sign up, individuals providing information are notified that they are being added to the contact list, and will be receiving emailed information. This is true no matter where they sign up: in-person sign-in at an event, a contact made through the internet, or by phone. All emails sent from the contact list contain a prominent "unsubscribe" option.

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 following controls have been implemented for protecting system sensitive data and resources. All physical access to Department sites are controlled and monitored 24/7 by security personnel who ensure that all persons entering the building are properly badged to enter the building. The computer systems employed by ED offer a high degree of resistance to tampering and circumvention. The Department uses special software programs for monitoring network traffic to identify unauthorized attempts to upload or change information, or otherwise to cause damage to this government computer system. These programs collect no information that would directly identify individuals, but they do collect information that could help ED identify someone attempting to tamper with the Web site. Additionally, there number of individuals who can access the contact list is limited. The folder where the Regional Office Contact List's are stored is locked, so only regional office members will have access. All ED computers require a username and password to log in.

In disseminating information through email, the contacts will be placed in the BCC field so no external individual has access to the information when they open or reply to the message. This information will be stored on a regional email system; there will be ten individual email addresses to correspond with each regional office. Each regional office has an office leader; they will determine which regional staff members in their regional office receive access to the email system and at what level of control. The data will be periodically saved as a MS Excel document on a regional shared drive where only regional staff members will have access, this is to ensure as a back-up. Because these documents are to be stored on ED computers the firewalls and safeguards that protect ED data will protect these contact lists.

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 being collected 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:

Records are covered under General Records Schedule 23 item 7 Transitory Records. These records are Destroy immediately, or when no longer needed for reference, or according to a predetermined time period or business rule (e.g., implementing the auto-delete feature of electronic mail systems). (N1-GRS-04-5, item 1).