



Privacy Impact Assessment For
Promise Neighborhoods Website

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Point of Contact

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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 Promise Neighborhoods Website is a training and technical assistance tool for timely public information about the Promise Neighborhoods Program, current and future funding opportunities, and other cradle-to-career resources.

The public pages offer general information about the Department of Education (ED) and the Office of Innovation and Improvement (OII), the Promise Neighborhoods Program, and cradle-to-career initiatives that support 10 major results areas. Resources include original promising practice guides, other publications, toolkits, multimedia, and links to other publicly available and reliable websites or resources meeting the needs of grantees. The Website will host regular webinar conferences to disseminate information in a live setting to large groups of interested parties, and these webinars will be compiled into a searchable archive. The public pages also provide basic information on the Promise Neighborhoods Grant Program, including program history, current awardees, and upcoming opportunities. A calendar of public events and periodical newsletters will offer interested parties a direct source of information on Program news and key funding dates. Public users will also have the option to register their email address to receive periodic news alerts and announcements from the Promise Neighborhoods Team.

A separate password-protected group of private pages provides the Promise Neighborhoods Team and Grantees a secure location to share ideas, information, and form a virtual community of practice. The Promise Neighborhoods Team and Grantees have the opportunity to register for Website accounts pending approval. The accounts allow access to the private suite of pages, where registered users can find avenues of support about grant administration and links to other resources of interest to the Grantee population. Through the private pages, Grantees also access archives of Project Directors Meetings materials and resources to build communities of practice.

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 Promise Neighborhoods Program, which is a project grant program funded through CFDA 84.215 by ED. It is authorized under Title V, Part D, Subpart 1, sections 5411 through 5413 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended.

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?

A public user (and non-grantee) may browse most of the Website without registering. However, a public user may register for periodic email announcements by voluntarily submitting their email address, along with optional pieces of information such as name, home state, position, and professional interests, through an online form.

Users affiliated with a Promise Neighborhoods Grantee may register for a secure account on the site by completing an online form that collects:

- Name
- Email address
- Grantee-affiliated organization
- Position at organization
- Secure, personal password

Registered grantees will use their approved account to enable access to the private pages on the Website. Online forms collect all information and no information is used to link or cross-reference multiple databases.

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 Website will serve as a timely tool to disseminate information about the Promise Neighborhoods Program to interested parties in the educational and policy fields across the nation. As the most efficient method of mass communication, the Website will send major announcements through email, necessitating the collection of email address. No other PII is required to receive email communications, and any other information submitted voluntarily is used solely to inform content development and customer satisfaction processes.

The registration form for a grantee account collects only the information required to verify that the user is affiliated with a current Promise Neighborhoods Grantee organization. This process ensures that the private area of the Website is a secure location for the Promise Neighborhoods Team and Grantees to interact and collaborate. There will be interactive features which promote collaboration with grantees but the information about the grantees is limited to what they share on the site. The impact and risks will be minimal as the information collected is minimal as the information collected for the website is only for the purpose of authentication of the logged in users and tracking of users by the site administrators. In order to mitigate the risks, the access logs are monitored on a regular basis for unauthorized access. The system is configured in compliance with NIST standards for access and security.

The PN 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 PN 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 Website does not collect SSNs.

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 for a public user to receive voluntary email announcements of general interest to the field or for a user affiliated with a grantee organization to register for a secure account and access private materials of interest solely to the Promise Neighborhoods Team and Grantees.

Public users' email addresses and any optional information provided voluntarily will be stored in a single database from which a mailing list will be developed. Basic analyses (e.g., frequency counts) may be conducted on the optional information to inform usage trends and customer service procedures.

The information provided in the grantee registration form will be entered into a database and compared to a list of ED-funded grantee organizations to verify the account and will not be analyzed further. The user will then use their unique account to access private materials of relevance to Promise Neighborhood grantees.

The system does not use commercial information, publicly available information, or information from other Federal agency databases

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?

Information is not shared with other internal ED organizations.

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 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?

Users will have the option to view most of the Promise Neighborhoods Website content without completing any online information collection forms. Registration is required only to receive email announcements and/or to access private materials intended solely for the Promise

Neighborhoods Team and Grantees. A notice is posted on the Website next to the online forms, explaining the collection process and use of submitted information and advising the user that any information is submitted voluntarily and will not be shared with external parties.

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 the Promise Neighborhoods Website 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.