



## **Privacy Impact Assessment**

For  
**Rehabilitation Services Administration Management Information System  
(RSA-MIS)**

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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 Rehabilitation Services Administration (RSA) within the Office of Special Education and Rehabilitative Services (OSERS) operates the RSA Management Information System (RSA-MIS). This system collects information from RSA grantees regarding performance and expenditures under RSA grants to support a wide array of the almost two dozen programs supported by RSA. The RSA-MIS consists of three components:

1. A web-based component which collects and disseminates performance and financial reports for over a dozen RSA programs. No PII is collected by the web-based component.
2. A web-accessible component to allow Basic Vocational Rehabilitation (VR) grantees to upload sensitive data on the RSA-911 Case Service Report.
3. A database server accessed by Department employees to process, query, aggregate, and store the above-mentioned PII data, as well as housing other PII data to support the Long-Term Training program.

## 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 Rehabilitation Services Administration (RSA) was established by Congress as the principal federal agency authorized to carry out Titles I, III, VI and VII, as well as specified portions of Title V of the Rehabilitation Act of 1973, as amended. RSA provides national leadership for, and administration of,

- basic state and formula grant programs,
- independent living centers,
- service projects,
- rehabilitation training discretionary grant programs,
- Randolph-Sheppard vending facilities and
- Helen Keller National Center programs

These programs develop and implement comprehensive and coordinated programs of vocational rehabilitation, supported employment and independent living for individuals with disabilities, through services, training and economic opportunities, in order to maximize their employability, independence and integration into the workplace and the community.

RSA is responsible for the formulation, development and implementation of regulations, policies, and guidelines. RSA serves as a resource and clearinghouse of information for service providers at national, state and local levels in the development of national programs to reduce or eliminate social and environmental barriers experienced by persons with disabilities.



### 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 first component (the web portal) contains no PII. Certification and Accreditation was conducted in March 2008.

The second component (the RSA-911 Data Collection) contains the following personally identifiable information (PII).

- SSN
- Dates of Birth (DOB)
- Gender
- Race
- Ethnicity
- Zip Code
- Veteran Status
- County Name at Application
- Source of Referral
- Involvement with Other Agencies and Service at Application
- Level of Education at Application and Closure
- Whether they are a student with a 504 accommodation plan or IEP
- Living Arrangement at Application
- Type of impairment and cause of impairment
- Significance of disability
- Employment Status at Application and Closure
- Weekly earnings at application and closure
- Hours worked in a week at application and closure
- Monthly support amounts at application and closure
- Primary source of support at application and closure

For the second component, our grantees are the source of the information (SSNs for the second component are self-provided by people in the program; however, this is optional and about 4% opt out). These data are provided to RSA in a text file uploaded to a secure SFTP server, then off-loaded and validated, moved into a SQL Server database. A Privacy Impact Assessment was written for this component which was previously called "Case Service Report" and is dated April 14, 2008. It is now being consolidated with the RSA-MIS.

The third component (the PAYBACK supporting data) contains the following PII

- SSN
- Employment status
- Home address
- Bank account information

For the third component, our grantees are the source of the information. The processing of the Annual Report on the web-portal identified students who are late paying back their Long-Term Training Grants



(payback can be made by public service). Our grantees provide the PII in order that the Training Unit can forward the information to OCFO for collection. The data are provided via email, usually in PDF format.

#### **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.*

For the first component, there is no PII collected.

For the second component, the RSA / SMPID / Data Unit then uses MS Access to perform queries on the data, data are aggregated (removing PII) and aggregate data are uploaded into the website and made available to the public. The database is used to perform sundry queries and for research into Rehab Statistics and performance.

For the third component, SSNs are collected only in instances where a scholar must repay a debt that he/she did not repay through meeting the service obligation.

#### **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.*

The first component of the system contains no SSNs.

For the second component, the SSN is needed to share data with the Social Security Administration which merges SSI (Social Security Insurance) and SSDI (Social Security Disability Insurance) information based on the SSN and provides this to RSA and the National Institute on Disability and Rehabilitation Research (NIDRR) for research purposes.

For the third component, the SSN is necessary for confirming the identity of the individual and for verifying the debt.

The SSN is collected for a necessary business purpose and there are no reasonable alternatives. The collection is to ensure that participants repay funds in the event service payback cannot be completed. Participants who cannot complete a service payback are required by law to provide a cash payback. The U.S. Department of Treasury requires social security numbers to confirm identity and to provide to the Internal Revenue Service for collection purposes should a participant default on cash payback.

#### **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.*

For the first component, there is no PII collected.

For the second component, the information will be used in order to compute agency performance on standards and indicators mandated by section 106 of the Act as well as to assess their performance on



other evaluative performance measures used in monitoring of Vocational Rehabilitation (VR) grantees and for other program and research purposes. For example, the RSA-911 database is used by individuals for research on services provided as well as disability groups served. Because the VR program is the significantly largest program of the Act, the RSA-911 is almost always used in research projects funded in accordance of section 14 of the Act. The RSA-911 has been used by doctoral candidates using the information from the RSA-911 for their dissertations. In addition, the Department of Education will submit a disposition request, authorizing a three (3) year retention of the data file, to the National Archives and Records Administration (NARA). Pending NARA approval of the request for disposition authority, these records will not be destroyed.

For the third component, the SSN is necessary for confirming the identity of the individual and to forward to the U.S. Department of the Treasury to pursue collection if the individual fails to payback the scholarship with the agreed time in service for a qualifying employer.

### **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?*

For the second component, data are aggregated for posting on the RSA Web Portal. By aggregating the data, PII is removed. Data are also use to perform cross-agency and cross-year queries about individual progress performance.

For the third component, SSNs are shared with Office of the Chief Financial Officer (OCFO) for the purpose of processing the repayment of debt in the event that the debt is not paid back.

### **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?*

For the second component, the Data Unit routinely receives requests from researchers. In these cases if the request is approved the dataset will be scrubbed of SSNs and DOB before we release it. Also, the information is shared with the Social Security Administration annually in accordance with the Memorandum of Agreement (MOA) in order to merge with SSI (Social Security Insurance) and SSDI (Social Security Disability Insurance) information based on the SSN. This information is provided back to RSA and NIDRR for research purposes.

For the third component, if the individual does not repay the debt, the SSN, along with other relevant information, is provided to the U.S. Department of the Treasury to pursue collection if the individual fails to payback the scholarship within the agreed time in service for a qualifying employer.



## 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?*

For the second component, individuals have the opportunity to decline providing their SSN to the state agencies who collect the data. In these cases, the state agencies will invent a dummy SSN to use in the text file which is provided to RSA. Privacy data in the system will be accessible only to employees of OSERS. Aggregate and other non-privacy data is available to external researchers. A full description of opportunities for consent can be found at the URL listed in Question 10 below.

A full description of opportunities for consent and how information is shared with other organizations is provided in the System of Records Notice (18-16-02) was published in the Federal Register April 8, 2004. <http://www.ed.gov/notices/pai/pai-18-16-02.pdf>.

For the third component, the scholar provides SSN and other PII is provided to the universities or schools (who are the grantees) as a condition of receiving the scholarship. Notice is provided to individuals at the time of scholarship application. Scholarships are contingent on the provision of this PII.

## 10. Web Addresses.

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

The PII is not collected via a web application, so there are no web addresses (known or planned) that have a Privacy Notice.

## 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?*

For the first component, PII is not collected.

For the second component, this System Security Plan details the security requirements and describes the security controls that are in place to meet those requirements. Printed reports containing sensitive data produced from this system are maintained within the locked filing cabinets within the access-restricted State Monitoring and Improvement Division within Office of Special Education and Rehabilitative Services Headquarters. Additional storage and safeguards information is contained in the applicable System of Records Notice referenced below in Item 12.

For the third component, when we need to send or receive a PDF with PII with parties internal or external, PDFs are encrypted using WINZIP and password protected. They are sent via email, with the password sent in a separate email.

The information collected is secured following the guidance contained in OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and "Computer Security Act of 1987."



Because this system resides on EDUCATE, which has its own system security plan, please refer to the RSA-MIS system security plan and the EDUCATE system security plan.

The EDUCATE system security plan includes the following controls:

- All physical access to the Department site, and the sites of the Department contractors where this system of records is maintained, is controlled and monitored by security personnel who check each individual entering the building for his or her employee or visitor badge.
- The computer system employed by the Department offers a high degree of resistance to tampering and circumvention.

Both the EDUCATE system security plan and the RSA-MIS system security plan include the following controls:

- The security system limits data access to the Department and contract staff on a “need to know” basis, and controls individual users’ ability to access and alter records within the system.
- All users of this system of records are given a unique user ID with personal identifiers.
- All interactions by individual users with the system are recorded.

## **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?*

For the second component, a System of Records Notice (18-16-02) was published in the Federal Register April 8, 2004. <http://www.ed.gov/notices/pai/pai-18-16-02.pdf>.

For the third component, a SORN will be created.

## **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:*

RSA-MIS manages records in accordance with NARA’s “Grant Administration and Management Files,” Schedule Locator 254. The NARA disposition authority is N1-441-11-001. For the PAYBACK component, the Department of Education will submit a disposition request, authorizing a three (3) year retention of the data file, to the National Archives and Records Administration (NARA). Pending NARA approval of the request for disposition authority, these records will not be destroyed.