



## **Privacy Impact Assessment**

For

Office of Non-Public Education (ONPE) and Military Affairs Team (MAT) <sup>1</sup>

### **Constituent Inquiry Log (CIL) and Database**

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**U.S. Department of Education**

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<sup>1</sup> Note that the MAT CIL and databases perform the same functions and meet the same requirements as those for the ONPE CIL and database. The primary difference is that the MAT serves military-connected stakeholders and ONPE serves a nonpublic school constituency.



- 1. System Information.** Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions. Indicate whether the system is new or existing, and whether or not the PIA is new or being updated from a previous version; specify whether the system is 'agency' or 'contractor'.

### **ONPE CIL**

ED's Office of Non-Public Education (ONPE) is updating its Constituent Inquiry Log (CIL) in Microsoft Access for team (only) use. The CIL serves as a searchable information repository of inquiries and their responses for staff knowledge management, a tool for staff to track their own individual progress on inquiry closeout, and a source to inform staff on inquiry trends that require technical assistance.

The current CIL catalogs the following categories: Contact type, assigned to, category, subcategory, inquiry subject, initial notes, affiliation, interested party, date of receipt, date of final resolution, city/county, states/territories, and response.

The updated CIL enables staff to add attachments—including inquiries, responses, and associated documents—as searchable resources as well as track employee progress on inquiry closeouts. Also, staff can enter organization name, point of contact, email, and telephone number to manage inquiry closeout. Staff accesses this information in the CIL by doing a search for organizations or outstanding inquiries and reviewing such entries. In addition, staff may run reports to inform technical assistance efforts.

### **ONPE Database**

ONPE maintains a contact list in Microsoft Access for team (only) use to efficiently and effectively contact stakeholders and distribute information regarding ED grants, programs, initiatives, policies, and events such as the annual Private School Leadership Conference to ONPE constituents. ONPE adds contacts as new relationships develop or when personnel change at organizations listed in the database.

In general stakeholders provide contact information (business cards, for example) at meetings/events or by email or their contact information is in the public domain. Constituents include, but are not limited to, associations, government agencies, leaders of organizations, school personnel, and parents. The current database includes the following categories: Name, job title, other role, telephone number, email, organization, organization website, organization acronym, pertinent notes and address.



- 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?

#### **ONPE CIL**

The Congress declared that the establishment of a Department of Education is in the public interest to encourage increased involvement of the public, parents, and students in federal education programs per 20 U.S.C. 3402 (3). Communication and outreach are essential to encouraging involvement in federal education programs. ONPE's data collection informs its communication and outreach efforts. ED has authority through 20 U.S.C. Section 3412(e) (2) to perform public information functions and disseminate useful information about education issues and related opportunities to students, parents, and communities through the use of the latest technologies. This is an inherently governmental function. According to the OMB Circular number A-130 Revised government information is seen as a "national resource."

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- 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?

#### **ONPE CIL**

Staff may enter the following personally identifiable information, to the extent provided, in the CIL: Organization name, point of contact, email, and telephone number. Staff collects this information from constituents' emails and telephone voicemails. Constituents include, but are not limited to, associations, government agencies, leaders



of organizations, school personnel, and parents. The information is not used to link or cross-reference multiple databases.

### **ONPE Database**

The database includes the following personally identifiable information: Organization, name, telephone number, email, and address. ONPE adds contacts as new relationships develop or when personnel change at organizations listed in the database. In general stakeholders provide contact information (business cards, for example) at meetings/events or by email or their contact information is in the public domain.

Constituents include, but are not limited to associations, government agencies, leaders of organizations, school personnel, and parents. The information is not 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 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.

### **ONPE CIL**

ONPE requires a tool to inform current and new staff of responses to inquiries for the purpose of knowledge management, to help staff manage their individual progress on inquiry closeout, and to track trends to inform technical assistance. This information allows ONPE to build internal knowledge and capacity to address inquiries, help make the inquiry response process more efficient, and guide the outreach activities so that ONPE can serve its customers effectively. Although there is a small privacy risk in collecting this data compared to not collecting it, this risk has been properly mitigated with security and data handling measures as discussed below.

### **ONPE Database**

As the Department's liaison to the nonpublic school community, ONPE requires a contact list to contact stakeholders and distribute information regarding ED grants, programs, initiatives, or policies to constituents efficiently and effectively. This is part of ONPE's overall communications strategy that includes email messages and pertinent announcements to serve its customers. Although there is a small privacy risk in collecting this data compared to not collecting it, this risk has been properly mitigated with security and data handling measures as discussed below and individuals can ask to be removed from the list at any time.

- 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. If no SSN is collected, no signature is required.

**ONPE CIL**

No Social Security Numbers are collected.

**ONPE Database**

No Social Security Numbers are collected.

- 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.

**ONPE CIL**

The purpose for the ONPE CIL is to provide a knowledge management tool to inform current and new staff of responses to inquiries, to help staff manage their individual progress on inquiry closeout, and to track trends to inform technical assistance. Staff collects this personally identifiable information from constituents' emails as well as telephone calls and voicemails. The information is used by ONPE staff only to build internal knowledge and capacity to address inquiries, to help make the inquiry response process more efficient, and to guide the outreach activities so that ONPE can serve its customers.

**ONPE Database**

The purpose for the ONPE Database is to collect and maintain a contact list to communicate with stakeholders and distribute information regarding ED grants, programs, initiatives, policies, and events to constituents efficiently and effectively. The information is used by ONPE staff only as part of ONPE's overall communications strategy. The only publically available information that this system may utilize is contact information for stakeholders from associations, government, and schools documented on organizational websites. These contacts are treated like any other contact within the database. Overall the database enables ONPE to reach a broad audience that it would be unable to reach any other way and provides opportunities for interactive communication.

- 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?



### **ONPE CIL**

While the CIL is an internal tool for the ONPE team, ONPE may share CIL information/reports with ED staff to help serve its stakeholders more efficiently and effectively. Generally, ONPE has no need to share personally identifiable information from the CIL.

### **ONPE Database**

ONPE may share database information within ED and its logistics contractor for the purposes of disseminating information to these constituents. Personally identifiable information shared may include organization, address, email, and telephone number. This information is shared internally on a need-to-know basis.

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?

### **ONPE CIL**

Data from the ONPE CIL is not distributed outside of the Department.

### **ONPE Database**

Constituent contact information from the ONPE Database is shared with the public only with the approval of the individual whose personal information ONPE has collected. For example, if a national private school organization leader contacts ONPE to request contact information for a stakeholder, ONPE will only provide the contact information with permission from the stakeholder.

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?

### **ONPE CIL**



ONPE does not provide notification to constituents submitting an inquiry that their inquiry, response, and personally identifiable information may be collected.

**ONPE Database**

ONPE adds constituents to the contact list if they provide contact information or if they are leaders in the field and their information is in the public domain. ONPE does not provide notification to constituents that their personally identifiable information may be collected.

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

**ONPE CIL**

Not Applicable

**ONPE Database**

Not Applicable. ONPE enters a new stakeholder into the database at its discretion.

- 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?

**ONPE CIL**

The CIL is stored on the ONPE K drive, to which only ONPE staff has access. ED has established the following controls for protecting personally identifiable information. All physical access to Department sites is controlled and monitored at all times by security personnel who ensure that anyone entering the building has a badge. 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 information that could help ED identify someone attempting to tamper with the website. All ED computers require a username and password to log in. Because the CIL is stored on ED computers, the firewalls and safeguards that protect ED data will protect the CIL's content.

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- 12. Privacy Act System of Records.** Is the information within the system retrieved by personal identifier? 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 collected in the ONPE CIL and Database is not retrieved by name or personal identifier. Therefore, a Privacy Act System of Records Notice is not necessary.

- 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:

#### **ONPE CIL**

These records are destroyed when no longer needed for reference consistent with GRS Schedule 3.1, Item 020. Disposition Authority: DAA-GRS-2013-0005-0004. Destroy 3 years after agreement, control measures, procedures, project, activity, or transaction is obsolete, completed, terminated or superseded, but longer retention is authorized if required for business use.

#### **ONPE Database**

These records are destroyed when no longer needed for reference consistent with GRS Schedule 3.1, Item 051. Disposition Authority: DAA-GRS-2013-0005-0003. Destroy 5 years after the project/activity/transaction is completed or superseded, or the associated system is terminated, or the associated data is migrated to a successor system, but longer retention is authorized if required for business use.