



Privacy Impact Assessment (PIA) for the

Impact Study of Feedback for Teachers Based on Classroom Videos

May 3, 2017

This PIA was approved on Oct 3, 2017 and reviewed on Sep 27, 2017 by the system owner certifying the information contained here is current and up to date.

Contact Point

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System Owner

Name/Title: Mathematica Policy Research

Program Office: Institute of Education Sciences (IES)

Reviewing Official
Kathleen Styles
Chief Privacy Officer
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Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at privacysafeguards@ed.gov.

Please complete this **Privacy Impact Assessment (PIA)** on how personally identifiable information (PII) is collected, stored, protected, shared, and managed electronically by your system. You may wish to consult with your ISSO in completing this document. **If a question does not apply to your system, please answer with N/A.**

All text responses are limited to 2,000 characters. If you require more space, please contact the Privacy Safeguards Team.

1. Introduction

1.1 N/A Describe the system including the system name, system acronym, and a brief description of the major functions.

The system, “Impact Study of Feedback for Teachers based on Classroom Videos,” is an application hosted in the IES Data Center. The system will be used to conduct a rigorous study of the effectiveness of support to teachers based on their teaching practices within their classroom. The system will include personally identifying information of teachers who voluntarily participate in the evaluation and will include the following information about the teachers: background characteristics, teaching experience, teacher preparation experiences, knowledge of teaching practice, and experience with professional development and feedback to support their teaching practice. The system will also include personally identifying information of the students in the participating teacher classrooms, including demographic information such as race, ethnicity, gender, age, eligibility for free- or reduced-price lunch, English language learner status, and test scores on standardized English/Language Arts and mathematics achievement tests. Teacher survey responses will be collected electronically in order to improve the efficiency of the data collection effort and for the convenience of teachers.

1.2 N/A Describe the purpose for which the personally identifiable information (PII)¹ is collected, used, maintained or shared.

Data will be used to describe the support provided to the teachers participating in the study and the impact of providing the study’s provided coaching on teachers’ classroom practice and the achievement of their students. Teacher survey responses will be collected electronically in order to improve the efficiency of the data collection effort and for the convenience of teachers. Data from district records will also be collected through a secure electronic transfer. Ultimately the findings from this evaluation will be used to inform improvements to teacher preparation and professional development. The findings from the study will be presented in a written report and will be shared with the Congress and relevant Department of Education offices. The data from the evaluation with personally identifiable information will not be shared, either internally or externally.

Data analyses will be conducted using data that have been stripped of all individual identifiers (e.g., names), other than encrypted identifiers. Data and results that are reported or released will contain no individually identifying information. Any disclosures will be made only to the extent that they are compatible with the statutory and program purposes for which the records were collected or are otherwise authorized by the Privacy Act.

¹ The term “personally identifiable information” refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

<https://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-16.pdf>

1.3 N/A Is this a new system, or one that is currently in operation?

New System

1.4 N/A Is this PIA new, or is it updating a previous version? If this is an update, please include the publication date of the original.

New PIA

Original Publication Date:

1.5 N/A Is the system operated by the agency or by a contractor?

Contractor

2. Legal Authorities and Other Requirements

If you are unsure of your legal authority, please contact your program attorney.

2.1 N/A What specific legal authorities and/or agreements permit and regulate the collection and use of data by the system?

The study is authorized under sections 171(b) and 173 of the Education Sciences Reform Act of 2002 (ESRA)(20 U.S.C. 9561(b) and 9563) and section 8601 of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA).

¹ The term “personally identifiable information” refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

<https://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-16.pdf>

SORN

- 2.2 N/A Is the information in this system retrieved by an individual's name or personal identifier such as a Social Security Number or other identification? Please answer **YES** or **NO**.

Yes

- 2.2.1 N/A If the above answer is **YES** this system will need to be covered by a Privacy Act System of Records Notice(s) (SORN(s)).² Please provide the SORN name and number, or indicate that a SORN is in progress.

A system of records notice, "Impact Study of Feedback for Teachers based on Classroom Videos," 18-13-40, is currently under review in preparation for publication.

Records Management

If you do not know your records schedule, please consult with your records liaison or send an email to RMHelp@ed.gov.

- 2.3 N/A Does a records retention schedule, approved by the National Archives and Records Administration (NARA), exist for the records contained in this system? If yes, please provide the NARA schedule number.

Records are maintained and disposed of in accordance with the Department's Records Disposition Schedules (ED/RDS, Part 3, Item 2b and Part 3, Item 5a).

- 2.4 N/A Is the PII contained in this system disposed of appropriately, and in accordance with the timelines in the records disposition schedule? Please answer **YES** or **NO**.

Yes

3. Characterization and Use of Information

Collection

- 3.1 N/A List the specific personal information data elements (e.g., name, email, address, phone number, date of birth, Social Security Number, etc.) that the system collects, uses, disseminates, or maintains.

The system will collect PII about the students in the participating classrooms, including demographic information such as race, ethnicity, gender, age, eligibility for free- or reduced-price lunch, English language learner status, and test scores on standardized English/Language Arts and mathematics achievement tests. It will also collect PII about the teachers participating in the evaluation, including demographic information, such as race, ethnicity, gender; certifications, degrees, years of teaching experience, teacher preparation experiences, knowledge of teaching practice, and experience with professional development and feedback to support their teaching practice. Finally, the PII will include contact information such as name, home address, and home phone number to facilitate follow-up data collection.

² A System of Records Notice (SORN) is a formal notice to the public that identifies the purpose for which PII is collected, from whom and what type of PII is collected, how the PII is shared externally (routine uses), and how to access and correct any PII maintained by ED. <https://connected.ed.gov/om/Documents/SORN-Process.pdf>

3.2 N/A Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2? Please answer **YES** or **NO**.

Yes

3.3 N/A What are the sources of information collected (e.g., individual, school, another agency, commercial sources, etc.)?

The study includes data from individuals (teachers) who teachers who voluntarily participate in the evaluation. The system will also include personally identifying information of the students in the participating teacher classrooms, including demographic information such as race, ethnicity, gender, age, eligibility for free- or reduced-price lunch, English language learner status, and test scores on standardized English/Language Arts and mathematics achievement tests, collected from their district's administrative records. The districts have volunteered to participate in the evaluation.

² A System of Records Notice (SORN) is a formal notice to the public that identifies the purpose for which PII is collected, from whom and what type of PII is collected, how the PII is shared externally (routine uses), and how to access and correct any PII maintained by ED. <https://connected.ed.gov/om/Documents/SORN-Process.pdf>

3.4 N/A How is the information collected from stated sources (paper form, web page, database, etc.)?

Teacher survey responses will be collected electronically in order to improve the efficiency of the data collection effort and for the convenience of teachers.

3.5 N/A How is this information validated or confirmed?³

All data undergo consistency and quality control checks.

Use

3.6 N/A Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above.

The information collected will be used to describe the support provided to the teachers participating in the study and the impact of providing the study's provided coaching on teachers' classroom practice and the achievement of their students. The study will address the following research questions: What is the impact on teaching practices and student achievement of providing novice teachers with feedback on their teaching using multiple videos of their classroom practices? What is the impact on teaching practices and student achievement of providing early career teachers (those in their second, third, or fourth year of teaching) with feedback on their teaching using multiple videos of their classroom practices? Secondary research questions for the study are: Is intensive feedback more effective for certain types of teachers or students? Which teaching practices should feedback interventions focus on?

3.7 N/A Is the project using information for testing a system or for training/research purposes? Please answer YES or NO.

No

3.7.1 N/A If the above answer is **YES**, what controls are in place to minimize the risk and protect the data?

Enter text here.

3.8 N/A Does the system use "live" PII for the development or testing of another system? Please answer YES or NO.

No

3.8.1 N/A If the above answer is **YES**, please explain.

Enter text here.

³ Examples include form filling, account verification, etc.

Social Security Numbers

It is the Department's Policy that, in order to collect Social Security Numbers, the System Owner must state the collection is: 1) authorized by law, 2) necessary for an agency purpose, and 3) there is no reasonable alternative.

3.9 N/A Does the system collect Social Security Numbers? Please answer **YES** or **NO**.

No

³ Examples include form filling, account verification, etc.

- 3.9.1 N/A If the above answer is **YES**, explain the purpose for its collection, and how the SSN will be used. *Please note if the system collects SSNs, the PIA will require a signature by the Assistant Secretary or equivalent.*

Enter text here.

- 3.10 N/A Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

Enter text here.

4. Notice

- 4.1 N/A How does the system provide individuals notice about the collection of PII prior to the collection of information (i.e. written Privacy Act notice, link to a privacy policy, etc.)? If notice is not provided, explain why not.

The teacher surveys will contain the following language: According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The time required to complete this information collection is estimated to average 30 minutes. Your answers will be completely confidential; no information that identifies you, your school, or your students will be reported. Your responses are protected from disclosure per the policies and procedures required by the Education Sciences Reform Act of 2002, Title I, Part E, Section 183. Mathematica Policy Research will present the information collected as part of this study in an aggregate form, and will not associate responses to any of the individuals who participate. We will not provide information that identifies you, your school or district to anyone outside the study team, except as required by law. Your responses will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district, school or individual. Any willful disclosure of such information for nonstatistical purposes, without the informed consent of the respondent, is a class E felony.

- 4.2 N/A Provide the text of the notice, or the link to the webpage where the notice is posted.

The notice is currently undergoing internal ED review.

- 4.3 N/A What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Participation in the study is voluntary at the district and teacher level.

5. Information Sharing

Internal

5.1 N/A Will information be shared internally with other ED organizations? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.4.

Yes

5.2 N/A What information will be shared and with whom?

Findings from the study will be provided in a written report in aggregated form and available publicly. All from the “Impact Study of Feedback for Teachers based on Classroom Videos” evaluation that are reported or released will contain no individually identifying information.

5.3 N/A What is the purpose for sharing the specified information with the specified internal organizations? Does this purpose align with the stated purpose in Question 1.2 above?

Findings from the study will be provided in a written report in aggregated form and available publicly. The data from the evaluation with personally identifiable information will not be shared, either internally or externally. Data will be used to describe the support provided to the teachers participating in the study and the impact of providing the study’s provided coaching on teachers’ classroom practice and the achievement of their students. Ultimately the findings from this evaluation will be used to inform improvements to teacher preparation and professional development. This purpose aligns with the stated purpose of question 1.2 above.

External

5.4 N/A Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.8.

Yes

5.5 N/A What information will be shared and with whom? Note: If you are sharing Social Security Numbers, externally, please specify to whom and for what purpose.

Findings from the study will be provided in a written report in aggregated form and available publicly, including Congress and relevant Department of Education offices.

As required by the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563), a restricted use data file with study created identifiers will be available to researchers who are approved license holders and are in compliance with NCES data security procedures.

5.6 N/A What is the purpose for sharing the specified information with the specified internal organizations? Does this purpose align with the stated purpose in Question 1.2 above?

Data will be used to describe the support provided to the teachers participating in the study and the impact of providing the study's provided coaching on teachers' classroom practice and the achievement of their students. Ultimately the findings from this evaluation will be used to inform improvements to teacher preparation and professional development. This purpose aligns with the stated purpose of question 1.2 above.

As required by the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563), a restricted use data file with study created identifiers will be available to researchers who are approved license holders and are in compliance with NCES data security procedures.

5.7 N/A How is the information shared and used by the external entity?

Findings from the study will be provided in a written report in aggregated form and available publicly on the IES website. Data will be used to describe the support provided to the teachers participating in the study and the impact of providing the study's provided coaching on teachers' classroom practice and the achievement of their students. Ultimately the findings from this evaluation will be used to inform improvements to teacher preparation and professional development.

As required by the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563), a restricted use data file with study created identifiers will be available to researchers who are approved license holders and are in compliance with NCES data security procedures. Access to these data are for replication of the IES report and for further research purposes.

5.8 N/A Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU) or other type of approved sharing agreement with another agency? Please answer **YES** or **NO**.

No

5.9 N/A Does the project place limitation on re-disclosure? Please answer **YES** or **NO**.

Yes

6. Redress⁴

6.1 N/A What are the procedures that allow individuals to access their own information?

A system of records notice will be published and procedures according to the SORN will be followed. The notice is currently undergoing review.

6.2 N/A What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

A system of records notice will be published and procedures according to the SORN will be followed. The notice is currently undergoing review.

6.3 N/A How does the project notify individuals about the procedures for correcting their information?

A system of records notice will be published and procedures according to the SORN will be followed. The notice is currently undergoing review.

7. Safeguards

If you are unsure which safeguards will apply, please consult with your [ISSO](#).

7.1 N/A Does the principal office work with their CSO/ISSO to build privacy & security into the system and build privacy extensions to the extent feasible? Please answer **YES** or **NO**.

Yes

7.2 N/A What procedures or access controls are in place to determine which users may access the information and how does the project determine who has access?

All physical access to the IES Data Center, where this system of records is maintained, is controlled and monitored by security personnel. The IES Data Center offers a high degree of resistance to tampering and circumvention. The contractor limits data access to the IES Data Center to contract staff on a need-to-know basis, and controls individual users' ability to access and alter records within the system and other procedures to ensure confidentiality of data. By hosting this system in the IES Data Center the contractor is in compliance with the IT security requirements of the Department. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this system shall comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).

7.3 N/A What administrative, technical, and physical safeguards are in place to protect the information?

⁴ If the system has a System of Records Notice (SORN), please provide a link to the SORN in Question 6.1 and proceed to Section 7 - Safeguards.

All physical access to the IES Data Center, where this system of records is maintained, is controlled and monitored by security personnel. The IES Data Center offers a high degree of resistance to tampering and circumvention. The contractor limits data access to the IES Data Center to contract staff on a need-to-know basis, and controls individual users' ability to access and alter records within the system and other procedures to ensure confidentiality of data. By hosting this system in the IES Data Center the contractor is in compliance with the IT security requirements of the Department. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this system shall comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).

7.4 N/A Is an Authority to Operate (ATO) required? Please answer **YES** or **NO**.

Yes

7.5 N/A Is the system able to provide account of any disclosures made? Please answer **YES** or **NO**.

Yes

⁴ If the system has a System of Records Notice (SORN), please provide a link to the SORN in Question 6.1 and proceed to Section 7 - Safeguards.

7.6 N/A Is the information in the system appropriately secured in accordance with the IT security requirements and procedures as required by federal law and policy? Please answer YES or NO.

Yes

7.7 N/A Has a risk assessment been conducted where appropriate security controls to protect against that risk been identified and implemented? Please answer YES or NO.

Yes

7.8 N/A Please describe any monitoring, testing or evaluation conducted on a regular basis to ensure the controls continue to work properly at safeguarding the information.

All data undergo consistency and quality control checks.

8. Auditing and Accountability

8.1 N/A How does the system owner ensure that the information is used in accordance with stated practices in this PIA?

All physical access to the IES Data Center, where this system of records is maintained, is controlled and monitored by security personnel. The IES Data Center offers a high degree of resistance to tampering and circumvention. The contractor limits data access to the IES Data Center to contract staff on a need-to-know basis, and controls individual users' ability to access and alter records within the system and other procedures to ensure confidentiality of data. By hosting this system in the IES Data Center the contractor is in compliance with the IT security requirements of the Department. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this system shall comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).

8.2 N/A What are the privacy risks associated with this system and how are those risks mitigated?

All physical access to the IES Data Center, where this system of records is maintained, is controlled and monitored by security personnel. The IES Data Center offers a high degree of resistance to tampering and circumvention. The contractor limits data access to the IES Data Center to contract staff on a need-to-know basis, and controls individual users' ability to access and alter records within the system and other procedures to ensure confidentiality of data. By hosting this system in the IES Data Center the contractor is in compliance with the IT security requirements of the Department. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this system shall comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).