



## **Privacy Impact Assessment**

For

### **National Clearinghouse of Rehabilitation Training Materials (NCRTM) Repository System**

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**Office of Special Education and Rehabilitative Services (OSERS)**

**Rehabilitation Services Administration (RSA)**

**U.S. Department of Education**



## 1. System Information.

*Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.*

RSA's central repository of technical assistance and training materials (National Clearinghouse of Rehabilitation Training Materials or "NCRTM") is the centralized resource for the development, collection, dissemination, and utilization of training materials; as a forum for advancing knowledge through applied research and open dialog; and as a marketplace for career and staff development.

The contractor will migrate RSA's central repository of technical assistance and training materials (NCRTM) from an existing server to a new server that will be owned, operated, and maintained by the contractor. The contractor will also migrate the domain name from an ".org" to an ".ed.gov." The contractor will host the materials on the new, contractor-maintained server.

## 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 system is authorized by section 13 of the Rehabilitation Act of 1973 (the Act), as amended. Section 10 of the Act permits the Commissioner authority to administer these programs effectively and efficiently. Section 302 of the Act authorizes the Rehabilitation Training program and these program funds are being used to support this contract.

## 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?*

No sensitive PII will be collected. Elements that will be collected are: first and last name, title, organization, PR/Award number or Program name (if a grantee), and work email address. The sources of the information are community colleges, Tribal colleges, 4-year institutions of higher education, state vocational rehabilitation (VR) agencies, discretionary grantees, and other sources in the field of VR, such as scholars, national partnership groups, and academic professionals, and others.

The information will be collected online.

The information will not be 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.*

The purpose for collecting this information is to: 1) confirm the author of material. Material submitted to the central repository may be downloaded by an end-user. In the event that the user has questions regarding the material's content, the author's contact information must be available to the user. 2) confirm that discretionary grantees funded by RSA's Training and Service Programs Division fulfilled their grant requirement to submit all products developed in part or in whole with grant funds to NCRTM repository.



All information is publicly available.

## **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.*

SSNs will not be 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.*

The products and materials submitted to NCRTM will inform the field of vocational rehabilitation and may be used to identify emerging and promising practices, as well as data and information describing issues, challenges, and trends in the field. Additionally, the submissions will contain examples of training materials used to effectively train and prepare vocational rehabilitation counselors and professionals for today's marketplace.

## **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?*

The products and materials submitted to NCRTM may inform other offices within the Office of Special Education and Rehabilitative Services, Office of Vocational and Adult Education (OVAE), and the Office of Elementary and Secondary Education (OESE).

The products and materials submitted to NCRTM will inform the field of vocational rehabilitation and may be used to identify emerging and promising practices, as well as data and information describing issues, challenges, and trends in the field. Additionally, the submissions will contain examples of training materials used in order to effectively train and prepare VR counselors and professionals for today's marketplace.

## **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?*

External entities with which the data may be shared include the Department of Labor and the Department of Health and Human Services, as well as national partner groups such as the Council of State Administrators of Vocational Rehabilitation (CSAVR) for the purposes of nationally disseminating information to the field of VR regarding emerging and promising practices, as well as data and information describing issues, challenges, and trends in the field, as well as examples of training materials used to effectively train VR counselors and professionals. The data shared is not de-identified. All



material submitted to the central repository may be downloaded by any end-user within the Federal government or the public. In the event that the user has questions regarding the material's content, the author's contact information must be available to the user.

## 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?*

Notice is provided to the individual prior to the collection of their information. A Privacy Notice will be prominently posted on the departmental NCRTM website: <https://ncrtm.ed.gov> (proposed).

When logging into the NCRTM website there will be a notice to users notifying them that they are accessing a U.S. Government information system and they are consenting to the Privacy Policy Summary found below in sections a- f.

There is no notice or opportunity to decline providing information at the point of user registration, because this information is required to access the system.

All individuals submitting materials in the NCRTM must provide contact information so that the materials are appropriately attributed and the author can be contacted if a user has questions. Instructions for submitting a product will be developed and made available on the Web site. RSA grantees are required to submit their products to the NCRTM as a condition of receiving the grant award.

### a. Privacy Policy Summary

We collect no personal information about you unless you choose to provide that information to us. We do not give, share, sell, or transfer any personal information to a third party.

Some of our web pages (such as online publication order forms, conference and training registration forms, web discussion forums) let you voluntarily submit personal information. In those cases, we will provide a specific notice before you begin submitting any personal information, explaining how your information will be safeguarded.

If you want to know more about how we record non-personal information about your visit or how we use information that you voluntarily submit, read on.

### b. Non-personal Information

If you do nothing during your visit but browse through the website, read pages, or download information, our website's operating system will automatically record some general information about your visit.

During your visit, our web operating system will record:

1. The Internet domain for your Internet service, such as "xcompany.com" or "xcompany.net" if you use a private Internet access account, or "yourschool.edu" if you connect from a college or university domain.
2. The type of browser (such as "Netscape version X" or "Internet Explorer version X") that you are using.
3. The type of operating system that you use (such as Macintosh, Unix, or Windows).



4. The date and time you visit our site, and the web pages that you visit on our site.
5. The address of the previous website you were visiting, if you linked to us from another website.

We use this information for statistical analysis, to help us make our site more useful to visitors. This tracking system does not record information about individuals.

### **c. Cookies**

The Office of Management and Budget Memo M-10-22, Guidance for Online Use of Web Measurement and Customization Technologies [PDF, 106KB] allows Federal agencies to use session and persistent cookies.

When you visit any website, its server may generate a piece of text known as a “cookie” to place on your computer. Placing cookie text allows websites to “remember” visitors' preferences, surfing patterns and behavior while they are connected.

The cookie makes it easier for you to use the dynamic features of Web pages. Cookies from ED.gov Web pages only collect information about your browser's visit to the site; they do not collect any personal information about you.

There are two types of cookies, single session (temporary), and multi-session (persistent). Session cookies last only as long as your Web browser is open. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods.

**Session Cookies:** We use session cookies for technical purposes such as to enable better navigation through our site. These cookies let our server know that you are continuing a visit to our site. The OMB Memo 10-22 Guidance defines our use of session cookies as “Usage Tier 1-Single Session.” The Guidance states, “This tier encompasses any use of single session web measurement and customization technologies.”

**Persistent Cookies:** We use persistent cookies for two reasons: 1) to enable Google Analytics to differentiate between new and returning visitors to our site, and 2) to block repeated invitations to take the ACSI survey.

A Google Analytics (a third-party analytics provider) persistent cookie remains on your computer between visits to ED.gov for six months. Knowing if a user visited ED.gov within the past six months tells us the difference between visitors and “unique visitors” or those who visit our website more than once during this time period). This is an industry standard and provides high-level information on the breadth of traffic to and content usage of our given digital services. It is a powerful, invaluable metric because it's the only measure that accurately calculates how many individual users visited ED.gov website in a given time. Combined with total visits, it tells a more comprehensive story about ED.gov users and their visit patterns.

We also use persistent cookies to block repeated invitations to take the ACSI (American Customer Satisfaction Index) survey. Based on your usage pattern, you may be asked if you would like to complete a customer survey (the ACSI survey) of our website. The persistent cookie is set to block repeated survey invitations, and it expires in 90 days. Simply put, if you say you don't want to participate in the survey, the cookie will remember this, and will not allow you to be asked again. We feel it is important and respectful to our users not to ask them the same question more than once. The ACSI survey is customer satisfaction survey tool used by multiple federal agencies and organizations in the private sector. We use the ACSI survey so we can compare ED.gov results to other government agencies and top commercial websites. The ACSI enables ED.gov to: measure program performance;



identify targets of opportunity; efficiently leverage scarce resources; obtain valuable feedback from our users; focus management's attention on outcomes; and report customer satisfaction results.

The OMB Memo 10-22 Guidance defines our use of persistent cookies as “Usage Tier 2-Multi-session without Personally Identifiable Information (PII).” The Guidance states, “This tier encompasses any use of multi-session Web measurement and customization technologies when no PII is collected.”

If you do not wish to have session or persistent cookies stored on your machine, you can opt out or disable cookies in your browser. You will still have access to all information and resources at Department websites. However, turning off cookies may affect the functioning of some Department websites. Be aware that disabling cookies in your browser will affect cookie usage at all other websites you visit as well.

ED.gov uses a third-party analytics provider (Google Analytics) to analyze the data collected through the session and persistent metrics cookies. The third-party analytics provider does not receive personally identifiable information through these cookies and does not combine, match, or cross-reference ED.gov information with any other information. Please review the third-party analytics provider’s privacy policy for additional information.

Pursuant OMB Memo 10-22 Guidance Attachment III, V, these cookies collect information similar to that automatically received and stored on the servers hosting ED.gov; they do not collect personally identifiable information. ED.gov does not access or store the raw information collected through these cookies. We do view aggregate statistical analyses prepared by our third-party analytics provider, but these analyses do not include any personally identifiable information. We do not sell, rent, exchange, or otherwise disclose this information to persons or organizations.

#### **d. Information from E-mail You Send to Us**

If you decide to send us an electronic mail message (e-mail), the message will usually contain your return e-mail address. If you include personally-identifying information in your e-mail because you want us to address issues specific to your situation, we may use that information in responding to your request. In other limited circumstances, including requests from Congress or limited other parties, we may be required by law to disclose information that you submit.

Also, e-mail is not necessarily secure against interception. Please send only information necessary to help us process your request.

#### **e. Information Collected from Interactive Forms**

On some of our web pages we offer interactive forms that let you voluntarily submit personal information (such as your e-mail address, name, or organization). This occurs when you are registering for various conferences, workshops, or training sessions offered by ED, taking student aid counseling quizzes, ordering publications from ED Pubs, or submitting comments to various web discussion forums. In those cases, all submitted information is used only for the expressed purposes for which it is intended and is not made available to any third party. However, when you submit a comment to an ED web discussion forum, if you supply your name, e-mail address, or other personal information, that information is posted along with your comment.

#### **f. Links to Other Sites**

Our policy discloses the privacy practices for this website. But we may provide links to other websites. When you leave this website you will be going to sites that are beyond our control. We try to ensure that links that leave our site are clearly labeled, usually with a Disclaimer (exiting to another site) icon. These other sites may send their own cookies to users, collect data, or solicit personal information. The



privacy policies and procedures described here do not apply to any external links. We encourage you to read the privacy policies of any site you link to from ours, especially if you share any personal information. Be informed. You are the person best qualified to protect your own privacy.

## 10. Web Addresses.

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

<https://ncrtm.ed.gov> (proposed)

## 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?*

There will be no sensitive PII collected stored in this system.

New Editions has monitoring, auditing, authentication, and other security controls on the system and servers appropriate for low level systems. We are currently undergoing a Department of Education C&A and will have the results in August, 2014.

The NCRTM Repository resides on a Windows 2008 server located at the OutSourceIT datacenter at 350 Pencander Drive, Newark, Delaware, and is completely independent from the Department of Education's network.

Our IT support team schedules, performs, and documents routine preventative and regular maintenance on the components of the information system in accordance with manufacturer or vendor specifications and/or operating unit requirements. The OutSourceIT staff applies OS maintenance patches for testing purposes to a New Editions test server. Once testing is completed, New Editions/OutSourceIT technical staff notifies the NCRTM Repository system administrator that the patches are ready for installation on the production systems, and ultimately rolls these patches out. OutSourceIT network staff configures the server to receive the virus definition files automatically. OutSourceIT network staff will continue to do the ongoing maintenance for this task.

**Media Protection** - Media access is protected from unauthorized disclosure, damage, fraud, and abuse. Only authorized users have access to information in printed form or on digital media removed from the information system. All NCRTM Repository System media is stored in a server room. The datacenter is a locked and protected environment. The Department of Education has authorized access upon request to NCRTM Repository System media to New Editions/OutSourceIT personnel.

**Physical and Environmental Protection** - OutSourceIT enforces physical access authorizations for all physical access points (including designated entry/exit points) to the facility where the information system resides (excluding those areas within the facility officially designated as publicly accessible). OutSourceIT Trust verifies individual access authorizations before granting access to the facility. OutSourceIT controls entry to the section of the facility containing the information system using an access list, access card, and biometric physical access devices. OutSourceIT will control access to areas officially designated as publicly accessible in accordance with the organization's assessment of risk. OutSourceIT inventory physical access devices when personnel leave employment. Security is notified immediately if an access card is misplaced. The card is deactivated and the employee is issued a new access card. When individuals are not employed by OutSourceIT access badges are returned to security personnel. Only authorized New Editions and OutSourceIT personnel are allowed to access the transmission lines, as required in the event of a fault telco engineers are able to access line under



supervision. Access is controlled by Standard, Cypher, Touchpad, and Key Code Locks only authorized users have access to this code. Physical access to the facilities where the NCRTM Repository is located is prohibited to all unauthorized personnel. Physical and administrative controls are implemented to prevent unauthorized entry into the OutSourceIT data Center. The system components are secured in a locked cage with a card reader. An escort is required for all visitors to the OutSourceIT data Center. A security guard is located at the entrance of the OutSourceIT data center to verify, login and monitor all access by visitors. An access card and bio metric reader is used to access the data center from the main lobby. Once inside the data center from the main lobby only badge access is required. Physical access logs are reviewed by OutSourceIT senior security personnel every 30 days. The OutSourceIT site manager physically collects the access card, removes the employee from the access list, and deactivates the access card upon employee termination. OutSourceIT coordinates results of reviews and investigations with the incident response capability.

## **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?*

A system of record notice (SORN) is not needed because the information 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.

## **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:*

NCRTM manages records in accordance with NARA's General Records Schedule 20 (<http://www.archives.gov/records-mgmt/grs/>) and: "Grant Administration and Management Files," Schedule Locator 254. The NARA disposition authority is N1-441-11-001.