Privacy Impact Assessment (PIA)
for the
Teacher Appreciation Call-a-thon
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Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at privacysafeguards@ed.gov.
Introduction

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

*The Teacher Appreciation Call-a-Thon occurs each year in honor of Teacher Appreciation Week. Prior to the Call-a-Thon, the Department will accept nominations from ED employees and existing educator networks for teachers to receive a phone call of appreciation during the Call-a-Thon event.*

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

*The PII will be collected via email. ED staff and existing educator networks (Teacher Ambassador Fellows/Principal Ambassador Fellow alumni and Teach to Lead alumni) will be asked to enter into an Excel file the names and phone numbers of teachers that staff at ED can call to say “thank you” during Teacher Appreciation Week. The nominations will be emailed to the system owner, and the submitted nominations will be stored in a single file in the P: drive.*

1.3. Is this a new system, or one that is currently in operation?

*This is a new system.*

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

*This is a new PIA.*

1.5. Is the system operated by the agency or by a contractor?

*This system is operated by the agency.*

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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.  
2. Legal Authorities and Other Requirements

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

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

*ED has the authority through 20 U.S.C. Section 3412(e)(2) to perform public information functions, including the provision, through the use of the latest technologies, of useful information about education issues and related opportunities to students, parents, and communities.*

**SORN**

2.2. Is the information in this system retrieved by name or personal identifier? If so this system will need to be covered by a Privacy Act System of Records Notice(s) (SORN(s))\(^2\)? If no, explain why not. If yes, provide the SORN name and number, or indicate that a SORN is in progress.

*No, this information is not retrieved by name or personal identifier. Rather, the information in this system will be organized and retrieved by contact phone number area code which will be used to determine which time of day the phone call is placed.*

**Records Management**

*If you do not know your records schedule, please consult with your records liaison or RMHelp@ed.gov.*

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

*Yes, these are General Correspondence Files, Schedule No. 063.TEMPORARY: Cut off file annually. Destroy/Delete 2 years after cutoff.*

2.4. Is the PII contained in this system disposed of appropriately, and in accordance with the timelines in the records disposition schedule?

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\(^2\) 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.
Yes, the records will be secured and password protected on the Excel spreadsheet and then disposed of securely and properly. The printed copies will be destroyed immediately following completion of Call-a-thon.

3. Characterization and Use of Information
   Collection
   3.1. 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.
      • Teacher Name
      • Name of Teacher’s School
      • Teacher’s Phone Number
      • Teacher’s time zone
      • Reason for nomination
      • Name of individual nominating the teacher

   3.2. Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2
      Yes

   3.3. What are the sources of information collected (e.g., individual, school, another agency, commercial sources, etc.), how is the information collected from stated sources (paper form, webpage, database, etc.), and how is this information validated or confirmed?³
      Teacher’s contact information is collected from Department employees and existing educator networks via email. The validation of the information occurs when the “thank you” call is successfully placed to the nominated teacher.

Use
   3.4. Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above
      The system will contain a list of teachers and their contact information across the United States that staff at the Department can call to show their appreciation to.

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 the law, 2) necessary for an agency purpose, and 3) there is no reasonable alternative.

³ Examples include form filling, account verification, etc.
3.5. Does the system collect Social Security Numbers? If so, explain the purpose of its collection, type of use, and any disclosures. *Please note if the system collects SSN, the PIA will require a signature by the Assistant Secretary or equivalent.*

No, the system does not collect SSN.

3.6. Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

N/A

4. Notice

4.1. 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.

Notice is provided to the individual making the nomination via the email asking for nominations. Notice is not provided to the teachers being nominated in advance because the calls made are a surprise to the nominated teachers to express the Department’s appreciation for their work with children.

4.2. Provide the text of the notice, or the link to the webpage where notice is posted.

Dear Colleague,

This year, Teacher Appreciation Week will be celebrated on [INSERT DATE]. During the week, staff at the Department of Education will be engaging in several different activities to thank teachers across the nation for the incredible work they do every day with students, and we are hoping you can assist in one of these efforts.

On [INSERT DATE], staff at the Department will participate in a Teacher Appreciation Call-a-thon to let teachers know how much the Department appreciates their work. We would like to make sure we connect with teachers across the United States, and we would like your assistance in identifying those teachers.

To help, all we need you to do is complete the information in the attached Excel sheet. You can nominate as many teachers as you would like, and you can ask your colleagues to provide nominations, as well. Once you have all your nominations, please return the Excel file as an email attachment to [INSERT CONTACT]. All nominations are needed by [INSERT DATE].
Thanks so much in advance for your help with this project. If you have any questions, please feel free to reach out and let me know. And most importantly, thank you for all you do each day to help ensure that all children receive an excellent education in our nation.

4.3. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?
*Submitting nominations is completely voluntary.*

5. **Information Sharing**

Internal

5.1. Will information be shared internally with other ED organizations, if so, which ones?
*Information will be shared with staff at ED who volunteer to place calls as part of the Call-a-thon.*

5.2. What information will be shared and with whom?
*Participating staff will receive a hard copy of the nominated teachers they will contact. After staff place calls, their information sheets will be collected and shredded.*

5.3. 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?
*The purpose of sharing the information is to engage fellow ED employees in showing their appreciation for the work teachers do around the country each day. Without volunteers to make the calls, this event could not be executed. This is consistent with the purpose identified in Question 1.2.*

External

5.4. Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)?
*No*

5.5. What information will be shared and with whom?
*N/A*
5.6. What is the purpose for sharing the specified information with the specified external entity? Does this purpose align with the stated purpose in Question 1.2 above?  
_N/A_

5.7. How is the information accessed and used by the external entity?  
_N/A_

5.8. If the project is using the information for testing a system or for training/research purposes, what controls are in place to minimize the risk and protect the data?  
_N/A_

5.9. Does the system use “live” PII for the development or testing of another system? If so, please explain.  
_No_

5.10. Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU) or other type of approved sharing agreement with another agency?  
_N/A_

5.11. Does the project place limitations on re-disclosure?  
_N/A_

6. **Redress**

6.1. What are the procedures that allow individuals to access their own information?  
*Individuals who would like access to their information may contact the listed system owner.*

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

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4 If the system has a System of Records Notice (SORT), please provide a link to the SORT in Question 6.1 and proceed onto Section 7. Safeguards.
Individuals can contact by phone or email the listed system owner to correct any inaccurate or erroneous information.

6.3. How does the project notify individuals about the procedures for correcting their information?

*The posting of this Privacy Impact Assessment will act as the primary notification, however if the individual asks while receiving their call, the ED staff member will be able to provide more information.*

7. Safeguards

If you are unsure which safeguards will apply, please consult with your ISSO.

7.1. Does the principal office work with their CSO/ISSO to build privacy & security into the system and build privacy extensions to the extent feasible?

Yes

7.2. What procedures are in place to determine which users may access the information and how does the project determine who has access?

*The collection process sends all information to one email address as determined by the system owner. The information pulled from emails will be stored on one Excel file saved on a Department P: drive.*

*In disseminating information in hard copy on the day of the Call-a-Thon, call lists organized by area code will be provided to individual ED staff at the time they place calls to teachers. Following the completion of the calls, the lists will be collected by the system owner and destroyed.*

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

*The collected nominations will be retained electronically and maintained on ED’s computer systems. All physical access to the Department sites is controlled and monitored 24/7 by security personnel who ensure that all persons entering the building are properly badged to enter the building. The computer systems employed by ED offer a high degree of resistance or tampering and circumvention. The Department uses special software programs for monitoring network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage to government computer systems. These programs collect no information that would directly identify individuals, but they do collect information that could help ED identify someone attempting to*
tamper with the Web site. Additionally, the number of individuals who can access the nominations list is limited. All ED computers require a username and password to log on. The firewalls and safeguards that protect ED data will protect this nominations list as well.

The system owner will manually print and disseminate the call lists intended for volunteer ED staff placing the calls. Following the conclusion of the phone calls, the lists will be collected and destroyed.

7.4. Is an Authority to Operate (ATO) required? Has one been granted?
   No

7.5. Is the system able to provide an accounting of disclosures?
   N/A

8. Auditing and Accountability

8.1. How does the system owner ensure that the information is used in accordance with stated practices in this PIA?
   The system owner will be present for the entirety of the call-a-thon. The system owner will be responsible for distributing and collecting information from staff that are placing calls, and the system owner will be responsible for destroying the information (both physical and digital) after calls are placed.

8.2. What are the privacy risks associated with this system and how are those risks mitigated?
   The risk would be for an unauthorized individual to come into position of the information. This risk is mitigated by collecting information via ED’s email system, storing the digital information on a P: drive, and not allowing information to leave the room where calls are placed. In addition, the risk of this information being accessed by an unauthorized individual is further mitigated by the fact that the information is primarily the same information that is publically available on any school’s online phone directory. Accessing the information for this project would not give an individual much beyond what they could find on a school website.
Official Signatures

Senior Program Official ___________________________ Date __________

Computer Security Officer/Information System Security Officer ___________________________ Date __________

FOR SYSTEMS THAT COLLECT, MAINTAIN AND OR TRANSFER SSNs:

Assistant Secretary or equivalent or designee ___________________________ Date __________

Kathleen Styles, Chief Privacy Officer ___________________________ Date __________