Privacy Impact Assessment (PIA)

for the

LINCS Online Portal Information Technology Services Support

Date

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Please complete this **Privacy Impact Assessment (PIA)** on how information in identifiable form 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.

1. **Introduction**

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

   The Literacy Information and Communications System (LINCS) platform and delivery system has long served the adult education field through the delivery of professional development, facilitation of shared knowledge among states about professional development, and as a platform for direct communication among peers and with experts in the Community of Practice. The LINCS website, [https://lincs.ed.gov](https://lincs.ed.gov), serves as a central hub and brand for Division of Adult Education and Literacy's (DAEL) national leadership investments. LINCS supports OCTAE's vision\(^1\) for adult education under the Workforce Innovation and Opportunities Act\(^2\) (WIOA).

   The LINCS.ed.gov infrastructure represents a commitment by the Department to deepen and sustain the use of technology in adult education. The LINCS system supports instructors, instructional and administrative leaders, researchers, professional training and curriculum developers, and learners. Through this project, the Department seeks to expand and enhance the functionality, utilizing the best and most cost-effective solutions to meet the OCTAE's goals, as well as e-gov requirements. These services enable practitioners, learners, and others to easily find free, high quality, reliable, relevant, and up-to-date Web-based information; find and share ideas with colleagues or learners; and improve skills in using technology for adult, family and other literacy education purposes.

   The LINCS system consists of:

   - LINCS Resource Collection which contains vetted high-quality multimedia instructional resources, informed by research, for use by adult educators.
• LINCS Community where adult education practitioners can learn and share in groups focused on different adult education topics; interact with subject matter experts, network with peers across the country and access news and events.

• LINCS Learning Portal where adult educators can take online self-paced or facilitated professional development courses.

• LINCS Learner Center where adult learners can access free online resources to learn how to read, learn math, science, and English, acquire job skills, and find a program in their area. The resources on this site come from different government agencies or federally-funded projects.

• EL/Civics provides a series of online professional development courses to prepare English as a Second Language (ESL) instructors and volunteers to integrate U.S. History, U.S. Government, Civic Engagement, and the Naturalization Process into adult ESL classes.

The LINCS Technology Project system is composed of six public-facing sub-systems:

1. LINCS front page - https://lincs.ed.gov (no login) houses the LINCS Resource Collection.


5. Learner Center - https://learner.lincs.ed.gov (no login)

6. EL/Civics - https://elcivicsonline.org (legacy site maintained by LINCS)
1.2. Describe the purpose for which the personally identifiable information (PII)\(^1\) is collected, used, maintained, or shared.

- Email address - used for identification
- First name, last name - used for addressing a logged in user
- All other information is entered at will as part of coursework or to enhance community participation in forums.

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

All systems are currently operating.

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 PIA is updating a previous one filed in August of 2012

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

Currently run by contractor (CivicActions, Inc.) Under contract number ED-EVP-0-16-F-0001

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?

Under Title II of the Workforce Innovation and Opportunity Act (WIOA; PL 113-128), Section 242, OCTAE carries out a program of national leadership activities to enhance the quality and outcomes of adult education and literacy activities and programs nationwide. OCTAE uses these funds to provide technical assistance and professional development to programs and contribute to research and evaluations of adult education programs and activities.

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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.
2.2 **System of Record Notice (SORN):** 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.

A SORN is unnecessary because the information in the system will not be retrieved by name or identifier.

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

2.3.1 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.

Records are covered under General Records Schedule 23 item 7 Transitory Records.

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

Records are destroyed immediately when no longer needed for reference, or according to a predetermined time period or business rule (e.g., implementing the auto-delete feature on electronic mail systems). (NI-GRS-04-5, item 1).

3. **Characterization and Use of Information**

3.1 **Collection**

3.1.1 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.

Name, Email, Address, Phone Number, Date of Birth, Job Role, Organization Affiliation, Preferred Language, Etc.

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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. https://connected.ed.gov/om/Documents/SORN-Process.pdf.
3.1.2. **Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2.**

The information is collected to provide the best experience possible for users of the sites (as described in the introduction). Some information (marked with a double asterisk above "**") is being collected for planned future features, but is not yet being used. Mitigating this issue is the fact that the information is entered by the user and is displayed only to the user who can then edit or delete it. Nonetheless, the contractor has created tickets to address the unused date fields issue and we will provide Plan of Action and Milestones (POAMs) to describe the progress further.

3.1.3 **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?**

The user enters the data in their own profile. None of the information is checked for accuracy other than the email address via opt-in confirmation email at registration.

3.2 **Use: Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above.**

The information is collected on the LINCS Community is for identification and authentication purposes, allowing individuals to:

- Identify themselves to the system

- Authenticate with the system to prove that they are the same person when they return

- Carry out actions that impact that individual (e.g. joining a course or signing up for a mailing list subscription)

- Publish information to make it available to others (e.g. forum posting, comment on publications of learning resources, etc.)

- Access control purposes (e.g. updating notification settings, following a moderation of a discussion, etc.)

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3 Examples include form filling, account verification, etc.
3.3 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.*

3.3.1 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 SSN information is collected by any of the LINCS systems.

3.3.2 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.

The LINCS privacy policy is in the footer of every page.

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

Base URLs that have a link to the Privacy Policy in the footer:

- https://lincs.ed.gov/
- https://community.lincs.ed.gov/
- https://courses.lincs.ed.gov/
- https://learner.lincs.ed.gov/

Text of the notice:

https://lincs.ed.gov/privacy-policy
4.3 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Users may affirmatively request and join (or subscribe) to the LINCS email lists using the subscribe feature of the service. Users may contact LINCS to opt out (or unsubscribe) from the email list.

5. Information Sharing

5.1 Internal

5.1.1. Will information be shared internally with other ED organizations, if so, which ones?

Information is not shared outside of LINCS.

5.1.2. What information will be shared and with whom?

Information is not shared outside of LINCS.

5.1.3. 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?

N/A

5.2 External

5.2.1. Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)?

Information is not shared outside of LINCS.

5.2.2. What information will be shared and with whom?

Information is not shared outside of LINCS.

5.2.3. 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
5.2.4 How is the information accessed and used by the external entity?

N/A

5.2.5 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

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

N/A

5.2.7 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

5.2.8 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?

The user’s profile has access to all the information that they have entered.

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

The user can modify the information in their profile after logging in.

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

As the user is the creator of all the information in their profile, and they use the same method to modify the information they entered, there is no need to provide additional instruction.

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

The system is maintained and operated in accordance with FISMA guidance (e.g. NIST SP 800-53, et al), and Department of Education policy.

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

As described in the document Logical Access Control Guidance (Version 7.0, 19 Sep 2016) sections:

- AC-2 Account Management
- AC-5 Separation of Duties
- AC-6 Least Privilege

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

- A firewall system protects the network boundary of the LINCS system.
- An OSSEC system monitors system logs for anomalies and known issues.
- The entire LINCS system is in a FedRAMP certified data center which limits physical access to the servers.
- Privileged users are limited on an as needed basis, trained in PII awareness and their access is removed when they no longer need it.

7.4. Is an Authority to Operate (ATO) required? Has one been granted?

The LINCS system has an Authority to Operate (ATO) granted by the Department of Education that is in place until January 2019.
7.5. **Is the system able to provide an accounting of disclosures?**

The firewall logs access to the LINCS infrastructure, and the OSSEC HIDS real-time log-monitoring tool monitors those network access logs and other system logs.

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 Drupal platform strongly enforces a set of roles and permissions that ensure that general users do not have access to the PII of others without their explicit permission. The LINCS management team ensures that the limited number of privileged users have taken privacy awareness trainings and adhere to the best practices set.

8.2. **What is the privacy risks associated with this system and how are those risks mitigated?**

The privacy risks are unauthorized access to personal information. These risks are addressed through data minimization, robust security safeguards, as described above, trained privileged users and limited access to production (un-sanitized) data.