



Privacy Impact Assessment

International Resource Information System (IRIS)

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- 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'.

The International and Foreign Language Education (IFLE) within the Office of Postsecondary Education, U.S. Department of Education (ED) manages 14 grant and fellowship programs. It has developed a Web- based database that is used in conjunction with managing these 14 programs and disseminating information about them. The International Resource Information System (IRIS) contains publicly accessible records of current and past IFLE grantees and is a dissemination mechanism for information about all IFLE grant programs to the international education community and to the public as a whole. It also contains a grantee-only password protected reporting feature that captures and reports Annual/Final Performance Reports (APR) from current IFLE grantees.

- 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 information is collected under the legal authority of The Higher Education Act of 1965, as amended, Part A, Title VI, section 605(a).

The information is also collected under the authority of Education Department General Administrative Regulations (EDGAR) 74.51 which requires grantees to submit performance reports to US/ED. Also, the performance reports are required as part of the terms and conditions of the grant award (Attachment B). IFLE collects these reports through IRIS.

- 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, school, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

IRIS collects the names of individuals who receive grant funds for direct benefit. Individuals who receive grant funds from institutional awards (i.e., travel awards, per diem, etc.) have their names stored in IRIS from the G5 system as recipients of the funds. Individuals who receive fellowships from IFLE through an institution have their names listed on the public-facing side of IRIS. These lists contain the same information that is posted on www.ed.gov regarding IFLE fellowship recipients. There is no linking or cross-referencing.

- 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 identified and how they were mitigated.

The performance reports that grantees submit in IRIS collect information used to monitor grantee performance and to determine program outcomes in response to the requirements of the GPRA. IRIS collects information related to GPRA, as well as information used to demonstrate substantial progress of funded institutions. In order to determine if the goals of the projects are being met, targets and actual data must be tracked, sometimes over multiple years. IFLE staff track project activities during the grant period to determine program effectiveness and grantee compliance.

- 5. Social Security Numbers (SSN).** If SSNs are collected and used, describe the purpose of the collection, the type of use, and any intended disclosures. Also specify any alternatives that you

considered, and why the alternative was not selected. If system collects SSNs, the PIA will require a signature by your POC's Assistant Secretary.

SSNs are not collected, stored, or maintained within IRIS.

- 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?

Internal uses include using the information for monitoring the grants and conducting daily grant and fellowship-related administrative actions such as no-cost extensions, travel approvals, foreign language approvals, and overseas program approvals.

Data sets are available on the public side of IRIS and these are used by grantees as well as research organizations to conduct program analyses and evaluations. Program descriptions are available for public viewing in IRIS in order to disseminate grant information.

- 7. Internal Sharing and Disclosure.** With which internal ED offices/programs will the information be shared? What information is shared? For what purpose is the information shared?

Budget and performance information from IRIS is used by Budget Service in OPEPD to include in budget justifications and conduct analyses. The information also is sometimes used by contractors and by ED's own evaluation specialists to evaluate program performance.

- 8. External Sharing and Disclosure.** With what external entities 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?

Data sets are available on the public-facing website of IRIS and these are used by grantees as well as research organizations to conduct program analyses and evaluations. Project abstracts are shared as a means to disseminate grantee information to the public.

- 9. Notice.** Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice or a Privacy Act Statement)? 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 do individuals grant consent?

Yes. IRIS is cleared by the Office of Management and Budget as the sole reporting instrument for the 14 IFLE programs. Required fields in the IRIS website are marked by an asterisk; those fields without an asterisk are voluntary and all information is saved to the database.

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

<http://iris.ed.gov>

- 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?

IRIS is hosted outside of EDUCATE and is a web portal for grant reporting. It currently resides as a cloud server at Amazon Web Services N Virginia, and is a FedRAMP (a government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services) compliant hosting provider and are required to meet requirements, including those related to physical access to the facility. All physical access to the Department's site where this system of records is maintained, is controlled and monitored by security personnel who check each individual entering the building for his or her employee or visitor badge. All users access the system through an email address and unique password.

The IRIS server has security measures in place. Monitoring/ Auditing of all Windows Server event logs are performed on a regular basis. Microsoft Baseline Security Analyzer is used on periodic basis to check for any missing patches or other issues. Patches are tested and applied to the server on a weekly basis, depending on necessity. Authentication to the server is by encrypted VPN tunnel. A hardware firewall is in place to block all unnecessary ports going to the server. No other machines reside on internal firewall network except for IRIS server. The information collected by the system is considered public, but the various user accounts are setup in a way to only provide access to necessary mechanisms for the user. The IIS web logging system, Microsoft's default web hosting software on the Windows server, records all interactions.

- 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 IRIS system does not retrieve information by personal identifier, therefore a System of Records Notice (SORN) is not required under the Privacy Act, 5 U.S.C. 552a.

- 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:

The records disposition schedule is ED 254: Grand Administration and Management Files.
Disposition: Temporary. Destroy/Delete 10 years after final action is taken on file, but longer retention is authorized if required for business use. The records schedule number is N 1-441-11-00 I.