

**Privacy Impact Assessment (PIA)**

for the

**Title II Scholarship Administration and Reporting System (TSAR)**

**Aug. 20, 19**

**For PIA Certification Updates Only:** This PIA was reviewed on March 20, 2019 by Emory Morrison certifying the information contained here is valid and up to date.

**Contact Point**

**Contact Person/Title: Emory Morrison/ COR**

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**System Owner**

**Name/Title:** **Emory Morrison**

**Principal Office: Office of Postsecondary Education (OPE)**

**Please submit completed Privacy Impact Assessments to the Privacy Office at** [**privacysafeguards@ed.gov**](mailto: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.***

# Introduction

* 1. Describe the system including the name, acronym, and a brief description of the program or purpose for the system.

The Teacher Quality Enhancement (TQE) Scholarship program provides grants to approximately 30 institutions annually to distribute scholarships to students who are enrolled in teacher preparation programs and who agree to teach in high-need school districts. The primary goal of the system is to allow TQ staff to quickly identify recipients that are not fulfilling their obligation to the Department. The system will also track scholarship recipients upon graduation and assist in tracking debt collection in those cases where graduates do not meet their service obligation and must return their scholarship monies to the Department.

* 1. Describe the purpose for which the personally identifiable information (PII)[[1]](#footnote-1) is collected, used, maintained or shared.

The purpose of PII is to identify the correct grantees and also allow the Department to use this information to improve the tracking of grantees, their progress and to collect debts.

The Teacher Quality Enhancement Scholarship program has not been funded since 2010 so no additional data is being collected but the previously collected data is still being maintained and utilized in TSAR pursuant to the purposes that it was initially collected under.

* 1. Is this a new system, or one that is currently in operation?  
     Currently Operating System
  2. Is this PIA new, or is it updating a previous version?  
     New PIA
  3. Is the system operated by the agency or by a contractor?

Contractor

* + 1. If the system is operated by a contractor, does the contract or other acquisition-related documents include privacy requirements?

Yes

# Legal Authorities and Other Requirements *If you are unsure of your legal authority, please contact your program attorney.*

* 1. Whatspecific legal authorities and/or agreements permit and regulate the collection and use of data by the system? Please include name and citation of the authority.

The information is collected under the authority of Amendments to the Higher Education Act of 1965 -- Section 202. Partnership Grants, which authorizes the collection of data related teachers and early childhood educators, in schools and early childhood education programs, located in the geographic area served by the partnership . TSAR is the database that houses this information.

**SORN**

* 1. Is the information in this system retrieved by an individual’s name or personal identifier such as a Social Security Number or other identification?   
       
     No  
     1. If the above answer is **YES,** this system will need to be covered by Privacy Act System of Records Notice(s) (SORN(s)).[[2]](#footnote-2) Please provide the SORN name, number, Federal Register citation and link, or indicate that a SORN is in progress.



Click here to enter text.

* + 1. If the above answer is **NO**, explain why a SORN was not necessary. For example, the information is not retrieved by an identifier, the information is not maintained in a system of records, or the information is not maintained by the Department, etc.



Click here to enter text.

**Records Management**

**If you do not know your records schedule, please consult with your records liaison or send an email to** [**RMHelp@ed.gov**](mailto:RMHelp@ed.gov)

* 1. What is the records retention schedule approved by National Archives and Records Administration (NARA) for the records contained in this system? Please provide all relevant NARA schedule numbers and disposition instructions.

This is a web-based access database used to house scholarship recipient and grantee data. The Department shall submit a retention and disposition schedule that covers the records contained in this system to the National Archives and Records Administration (NARA) for review. The records will not be destroyed until such time as NARA approves said schedule.

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

# Characterization and Use of Information

**Collection**

* 1. List the specific PII elements (e.g., name, email, address, phone number, date of birth, Social Security, etc.) that the system collects, uses, disseminates, or maintains.

The personal information data collected for the system is listed below:

First Name

Middle Initial

Last Name

Address

Phone Number

Date of Birth

* 1. Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2?

Yes

* 1. What are the sources of PII collected (e.g., individual, school, another agency, commercial sources, etc.)?

Individual (Scholarship recipients)

School (Partnership Institutions)

* 1. How is the PII collected from the stated sources listed in Question 3.3 (e.g., paper form, web page, database, etc.)?

Information is no longer being collected. The last data collected was conducted in 2010, as the TQE program was no longer funded. The data is now being housed by TSAR.

* 1. How is the PII validated or confirmed to ensure the integrity of the information collected?[[3]](#footnote-3) Is there a frequency at which there are continuous checks to ensure the PII remains valid and accurate?

During the initial submission process, the contractors assisting the TSAR/TQE project and called each grantee and validated the information to ensure the data is accurate.

**Use**

* 1. Describe how the PII is used to achieve the purpose stated in Question 1.2 above.

While the TQE program has not been in existence since 2009, OPE is still required to monitor this grant initiative. To facilitate the monitoring of over 8,733 scholarship recipients, TSAR, is utilized by one OPE program staff person and one on-site contractor to update and maintain recipient’s teacher verification or repayment schedules. This allows the Department to efficiently manage the repayment of scholarship monies of recipients who have not met their service obligation. In addition to its use in managing a recipient’s status, the database is also used to generate statistical reports.

* 1. Is the system using PII for testing/researching new applications or information systems prior to deployment or for training employees?   
       
     No  
     1. If the above answer is **YES,** what controls are in place to minimize the risk and protect the data?



Click here to enter text.

**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.*

* 1. Does the system collect Social Security Numbers? Note that if the system maintains Social Security Numbers but does not explicitly collect them, answer 3.8.1 to address the purpose for maintaining them.

No

* + 1. If the above answer is **YES**, explain the purpose for its collection, and how the SSN will be used.



Click here to enter text.

* + 1. Specify any alternatives considered in the collection of SNNs and why the alternatives were not selected.



Click here to enter text.

# Notice

* 1. How does the system provide individuals with notice about the collection of PII prior to its collection (e.g., direct notice, such as a Privacy Act Statement (if applicable) or public notice, such as a SORN, PIA,)? If notice is not provided, explain why not.

Currently, no PII is collected. All PII was collected and entered in the system before 2011.

* 1. Provide the text of the notice or the link to the webpage where the notice is posted if notice is provided other than by SORN or PIA.



Click here to enter text.

* 1. What opportunities are available for individuals to consent to uses (including new uses of previously collected PII), decline to provide PII, or opt out of the project?

The only form submitted by a recipient is a teacher verification form. This is used to enter data into TSAR. The collection is voluntary.

* 1. Is the notice referenced in Question 4.1 reviewed and revised when there are changes in the practice, policy, or activities that affect the PII and privacy to ensure that individuals are aware of and can consent to, where feasible, these changes?

Yes

# Information Sharing and Disclosures

**Internal**

* 1. Will PII be shared internally with other ED principal offices? If the answer is **NO**, please skip to Question 5.4.  
       
     No
  2. What PII will be shared and with whom?



Click here to enter text.

* 1. What is the purpose for sharing the specified PII with the specified internal organizations?



Click here to enter text.

**External**

* 1. Will the PII contained in the system be shared with external entities (e.g. another agency, school district, the public, etc.)? If the answer is **NO**, please skip to Question 6.1.  
       
     No
  2. What PII will be shared and with whom? List programmatic disclosures only.[[4]](#footnote-4)   
     **Note: If you are sharing Social Security Numbers externally, please specify to whom and for what purpose**.



Click here to enter text.

* 1. What is the purpose for sharing the PII with the specified external entities?



Click here to enter text.

* 1. Is the sharing with the external entities authorized?



Click here to select.

* 1. Is the system able to provide and retain an account of any disclosures made and make it available upon request?



Yes

* 1. How is the PII shared with the external entity (e.g. email, computer match, encrypted line, etc.)?



Click here to enter text.

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



Click here to select.

* 1. Does the project place limitation on re-disclosure?  
       
     Click here to select.



# Redress

* 1. What are the procedures that allow individuals to access their own information?

Currently, TQE database does not allow any external users (Grantees or Recipients) to access the system. However, external users can call the OPE office and request for their own information.

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

Currently, the TQE application does not allow any external users (Grantees) to access the system. However, external users are sent letters for debt collection periodically and if they identify any issues with the personal information, they can call the OPE office and request for their own information. Letters do have the phone number as well as the address for the grantees to call back.

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

Periodically, verification letters are mailed to recipients.

# Safeguards *If you are unsure which safeguards will apply, please consult with your* [*ISSO*](https://share.ed.gov/teams/OCIO/IA/SEA/SEA_Collab/SitePages/ED%20ISSOs.aspx)*.*

* 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

* 1. Is an Authority to Operate (ATO) required?  
       
     Yes
  2. Under [NIST FIPS Pub. 199](https://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.199.pdf), what is the security categorization of the system: **Low, Moderate, or High?**  
     Moderate



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

Access is only provided if ISSO approves the written request from the COR; physically the database is in a network center which if fully secured. Technically, the system does not allow non-administrator users to access the administrator module.

* 1. Is the information in the system appropriately secured in accordance with the IT security requirements and procedures as required by Federal law and policy?

Yes

* 1. Has a risk assessment been conducted where appropriate security controls to protect against that risk have been identified and implemented?

Yes

* 1. Please describe any monitoring, testing or evaluation conducted on a regular basis to ensure the security controls continue to work properly at safeguarding the PII.

Vulnerability scans are conducted periodically and most findings are addressed by the contractor(s) supporting the hardware or the application. Application also tracks logins and logouts which are reviewed by the contractor on a monthly basis for any unwanted intrusions.

Infrastructure providers also run scans routinely on all the routers and other supporting devices to ensure that there is no intrusion through Operating System or other devices.

# Auditing and Accountability

* 1. How does the system owner assess and ensure that the PII is used in accordance with stated practices in this PIA?

The COR conducts QA checks on a monthly basis.

* 1. Does the system owner continuously monitor and audit the privacy controls to ensure effective implementation?

Yes

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

With there being only two internal users, the privacy risks are very minimal, however, should a risk be encountered it will be mitigated by implementing the actions detailed in TSAR's risk management plan.

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. [OMB Circular A-130, page 33](https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/OMB/circulars/a130/a130revised.pdf) [↑](#footnote-ref-1)
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> [↑](#footnote-ref-2)
3. Examples include restricted form filling, account verification, editing and validating information as it’s collected, and communication with the individual whose information it is. [↑](#footnote-ref-3)
4. If this information is covered by Privacy Act System of Records Notice (SORN) please list only relevant programmatic disclosures listed under the Routine Uses section. [↑](#footnote-ref-4)