



Privacy Impact Assessment (PIA) for the

RSA Webinar Platform/NCRTM Repository

Feb 21, 2018

This PIA was approved on Feb 21, 2018 and reviewed on Feb 21, 2018 by the system owner certifying the information contained here is current and up to date.

Contact Point

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Reviewing Official
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Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at 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.**

All text responses are limited to 1,500 characters. If you require more space, please contact the Privacy Safeguards Team.

1. Introduction

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

The system contains the National Clearinghouse for Rehabilitation Training Materials (NCRTM) and the Webinar Platform (referred to as the “RSAWP”). The NCRTM is the centralized repository for the collection, dissemination, and utilization of training and technical assistance materials. RSA-funded discretionary grantees are required to submit all materials developed with grant funds to the NCRTM. This grant requirement is contained in all application packages. Grantees may include, but are not limited to State and public or nonprofit agencies and organizations, including American Indian tribes and institutions of higher education. Other vocational rehabilitation professionals may also post materials for RSA to consider including in the NCRTM. The materials submitted to NCRTM 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, it contains examples of materials used to effectively train and prepare vocational rehabilitation counselors and professionals for today’s marketplace. Adobe Connect 9.6 is the platform used for webinars for RSA to present and share information (presentations, documents, etc.) with grantees and other vocational rehabilitation professionals while simultaneously discussing said content over a shared phone conference line.

1.2 ☐ N/A Describe the purpose for which the personally identifiable information (PII)¹ is collected, used, maintained or shared.

NCRTM Repository: The source of the content is from rehabilitation professionals who submit materials - they or their organizations develop - for RSA to consider including in the NCRTM. They are primarily RSA grantees. The NCRTM librarian uses the information collected to contact individuals if there are questions about or issues with the materials they have submitted.

RSAPW: The source of the information is from individuals who register for webinars. The information collected is used by the NCRTM librarian to provide them with information about webinars they have registered to attend.

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. <https://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-16.pdf>

1.3 ☐ N/A Is this a new system, or one that is currently in operation?

Currently Operating System

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

Updated PIA

Original Publication Date: 05/30/2014

1.5 ☐ N/A Is the system operated by the agency or by a contractor?

Contractor

2. Legal Authorities and Other Requirements

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

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

Legislative Authority: Section 15 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by the Workforce Innovation and Opportunity Act (WIOA).

SEC. 15. (a) The Secretary of Education shall establish a central clearinghouse for information and resource availability for individuals with disabilities which shall provide information and data.

The clearinghouse shall also provide any other relevant information and data which the Secretary of Education considers appropriate.

(b) The Commissioner may assist the Secretary of Education to develop within the Department of Education a coordinated system of information and data retrieval, which will have the capacity and responsibility to provide information regarding the information and data referred to in subsection (a) of this section to the Congress, public and private agencies and organizations, individuals with disabilities and their families, professionals in fields serving such individuals, and the general public.

(c) The office established to carry out the provisions of this section shall be known as the “Office of Information and Resources for Individuals with Disabilities”.

(d) There are authorized to be appropriated to carry out this section such sums as may be necessary.

[29 U.S.C. 712]

SORN

2.2 ☐ N/A Is the information in this system retrieved by an individual's name or personal identifier such as a Social Security Number or other identification? Please answer **YES** or **NO**.

No

- 2.2.1 ☒ N/A If the above answer is **YES** this system will need to be covered by a Privacy Act System of Records Notice(s) (SORN(s)).² Please provide the SORN name and number, or indicate that a SORN is in progress.

Records Management

If you do not know your records schedule, please consult with your records liaison or send an email to RMHelp@ed.gov.

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

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>

2.4 ☐ N/A Is the PII contained in this system disposed of appropriately, and in accordance with the timelines in the records disposition schedule? Please answer **YES** or **NO**.

Yes

3. Characterization and Use of Information

Collection

3.1 ☐ N/A 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.

For both NCRTM and RSAWP, the following information is collected (* indicate required fields):

- Name*
- Job Title*
- Organization*
- Organization Website
- Work email address*
- Work Phone number*
- Address, City, State, Zip
- RSA PR/Award Number

No sensitive PII collected.

3.2 ☐ N/A Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2? Please answer **YES** or **NO**.

Yes

3.3 ☐ N/A What are the sources of information collected (e.g., individual, school, another agency, commercial sources, etc.)?

Vocational rehabilitation professionals, primarily RSA grantees (i.e., representatives from State and public or nonprofit agencies and organizations, including American Indian tribes and institutions of higher education.) are the sources of the information collected.

3.4 ☐ N/A How is the information collected from stated sources (paper form, web page, database, etc.)?

The information is collected via web forms – for either individuals who submit materials to the NCRTM for RSA’s consideration or for individuals who register for webinars.

3.5 ☐ N/A How is this information validated or confirmed?³

The information is validated using an automated process to confirm the data entered meets specific requirements:

- Name* – Text.
- Job Title* – Text.
- Organization* – Alphanumeric.
- Organization Website – includes http:// or https:// in the URL.
- Work email address* – includes @.com, @.net, etc.
- Work Phone number* – ###-###-#### format.
- Address, City, State, Zip – Zip in ##### format.
- RSA PR/Award Number – HnnnAnnnnnn where A is any letter and n is any digit.

³
Examples include form filling, account verification, etc.

Use

3.6 ☐ N/A Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above.

NCRTM Repository: The NCRTM librarian uses the information to follow up with individuals if there is a question about their submissions - for example, if the material is not accessible to people with disabilities, if they forgot to attach a file (i.e., the material), forgot to add topics for indexing in the library, etc. The information is also used to create accounts if the individuals desire. Accounts do not require individuals to submit the information each time they submit a material, allowing them a simple convenience if they plan to post multiple materials. The account also allows them to view whether materials they have previously submitted have been approved or denied by RSA for inclusion in the NCRTM.

RSASP: The NCRMR librarian primarily uses the information to arrange for individuals' requested accommodations and to email them instructions for participating in the webinars; disseminate webinar materials such as the recording, transcript, presentations, etc.; and disseminate a post-webinar survey to anonymously collect input on the quality, relevance, and usefulness of the webinar and how participants plan to implement the knowledge, skills, and abilities gained in order to change behavior and or practice.

3.7 ☐ N/A Is the project using information for testing a system or for training/research purposes? Please answer YES or NO.

No

3.7.1 ☒ N/A If the above answer is **YES**, what controls are in place to minimize the risk and protect the data?

[Select Yes or No].

3.8 ☐ N/A Does the system use "live" PII for the development or testing of another system? Please answer YES or NO.

No

3.8.1 ☒ N/A If the above answer is **YES**, please explain.

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.

3.9 ☐ N/A Does the system collect Social Security Numbers? Please answer **YES** or **NO**.

No

3.9.1 ☒ N/A If the above answer is **YES**, explain the purpose for its collection, and how the SSN will be used. *Please note if the system collects SSNs, the PIA will require a signature by the Assistant Secretary or equivalent.*

3.10 ☒ N/A Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

4. Notice

4.1 ☐ N/A 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.

NCRTM Repository

Notice is provided to the individuals on the submission and NCRTM registration pages prior to collection of the PII.

RSAWP

Notice is provided to the individuals via email invitations and on webinar registration pages prior to collection of the PII.

4.2 ☐ N/A Provide the text of the notice, or the link to the webpage where the notice is posted.

NCRTM Repository

The purpose of the NCRTM member portal is for RSA grantees to upload documents funded by RSA, and for organizations/individuals to submit multiple materials. When a grantee creates an account, materials uploaded will be directed to the responsible RSA project officer for review per RSA grantee requirements. Members who have created an NCRTM account can check on the status of a submitted material or upload new materials to the NCRTM.

RSAWP

“By registering for this webinar, you are agreeing to provide information necessary to conduct the RSA webinars and distribute information.” The name used to sign onto the webinar may be viewable on the participant chat screen during the webinar. Other personal data gathered by the NCRTM webinar system is restricted to authorized staff. Information collected is not transferred to third parties.

4.3 ☐ N/A What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Individuals may affirmatively request to join a webinar or submit materials as aforementioned. They can contact NCRTM if they do not wish to complete a form and still attend a webinar or submit materials and bypass providing the information.

5. Information Sharing

Internal

5.1 ☐ N/A Will information be shared internally with other ED organizations? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.4.

No

5.2 ☒ N/A What information will be shared and with whom?

5.3 ☒ N/A 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?

External

5.4 ☐ N/A Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)? Please answer **YES** or **NO**. If the answer is **NO**, please skip to Question 5.8.

No

5.5 ☒ N/A What information will be shared and with whom? Note: If you are sharing Social Security Numbers, externally, please specify to whom and for what purpose.

5.6 ☒ N/A What is the purpose for sharing the specified information with the specified external organizations? Does this purpose align with the stated purpose in Question 1.2 above?

5.7 ☒ N/A How is the information shared and used by the external entity?

5.8 ☒ N/A Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU) or other type of approved sharing agreement with another agency? Please answer **YES** or **NO**.

5.9 ☒ N/A Does the project place limitation on re-disclosure? Please answer **YES** or **NO**.

6. Redress⁴

6.1 ☒ N/A What are the procedures that allow individuals to access their own information?

The individual can email NCRTM librarian at NCRTM@neweditions.net.

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

6.2 ☒ N/A What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

The individual can email NCRTM librarian at NCRTM@neweditions.net.

6.3 ☒ N/A How does the project notify individuals about the procedures for correcting their information?

The NCRTM email is presented on the Contact Us page of the website.

7. Safeguards

If you are unsure which safeguards will apply, please consult with your [ISSO](#).

7.1 ☐ N/A Does the principal office work with their CSO/ISSO to build privacy & security into the system and build privacy extensions to the extent feasible? Please answer **YES** or **NO**.

Yes

7.2 ☐ N/A What procedures or access controls are in place to determine which users may access the information and how does the project determine who has access?

In accordance with the Department of Education security guidance and policies; system user access to the information is granted based on the need to know and the least privilege required to perform his/her duties. Specific technical privileges are limited to those specifically required for a specific job or an individual's position. Details on user types, roles, and authorizations are detailed in the NCRTM FIPS 199 Categorization and the NCRTM System Security Plan (SSP). Both RSA and the contractor determine who within who are permitted access to the information determined. These users either are employed by the contractor or RSA and have the appropriate security clearances.

7.3 ☐ N/A What administrative, technical, and physical safeguards are in place to protect the information?

We adhere to the DHS Binding Operational Directive BOD-18-01 for required web security. The required network traffic of the service is protected by a secure connection (HTTPS-only, with HSTS). SSL v2 and SSL v3 are disabled on the web server, and 3 DES and RC4 ciphers are disabled on the web server. Security controls for the RSAWP/NCRTM repository are documented in the System Security Plan. The internal system register is protected by personal user accounts, and by personal authorization of system administrator. Raging Wired data center housing the NCRTM Clearinghouse is SOC1, SOC2 and HIPAA compliant and security controls are in place in accordance with FISMA Moderate Security requirements including strong doors with locks, video monitoring, physical access logs, and secured window. In addition, Adobe data centers are SOC2, ISO27001, GLBA, HIPPA, FERBA compliant. Adobe Connect 9 had a good suite of security features for protecting customer communications and information.

7.4 ☐ N/A Is an Authority to Operate (ATO) required? Please answer **YES** or **NO**.

Yes

7.5 ☒ N/A Is the system able to provide account of any disclosures made? Please answer **YES** or **NO**.

No

7.6 ☐ N/A Is the information in the system appropriately secured in accordance with the IT security requirements and procedures as required by federal law and policy? Please answer YES or NO.

Yes

7.7 ☐ N/A Has a risk assessment been conducted where appropriate security controls to protect against that risk been identified and implemented? Please answer YES or NO.

Yes

7.8 ☐ N/A Please describe any monitoring, testing or evaluation conducted on a regular basis to ensure the controls continue to work properly at safeguarding the information.

Vulnerability scans are conducted every month using Tenable Nessus. Results are uploaded into CSAM. If any vulnerabilities are discovered they are remediated within the specified time-frame based on severity. The system requires annual audits of security artifacts and controls to ensure proper NIST security controls are documented and in place.

8. Auditing and Accountability

8.1 ☐ N/A How does the system owner ensure that the information is used in accordance with stated practices in this PIA?

Annual assessments.

8.2 ☐ N/A What are the privacy risks associated with this system and how are those risks mitigated?

According to the FIPS199 the security risk is low. RSA and contractor staff, systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Low Application which include administrative, technical and physical controls. These controls are in place to ensure integrity, availability, accuracy and relevancy of the data and to mitigate privacy risks.