



Privacy Impact Assessment (PIA)

for the

Graduate Assistance in Areas of National Need (GAANN)

January 24, 2022

For PIA Certification Updates Only: This PIA was reviewed on by certifying the information contained here is valid and up to date.

Contact Point

Contact Person/Title: Name/Title: Rebecca Ell/System Owner

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System Owner

Name/Title: Rebecca Ell/System Owner

Principal Office: Office of Postsecondary Education (OPE)

Please submit completed Privacy Impact Assessments to the Privacy Office 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.*

1. Introduction

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

The Graduate Assistance in Areas of National Need (GAANN) program awards fellowships through academic institutions of higher education to assist graduate students with excellent academic records who demonstrate financial need and plan to pursue the highest degree available in their course of study at the institution in a field designated as an area of national need.

GAANN is a web-based data management application that supports the collection and processing of performance data required by the U.S. Department of Education (Department) Office of Postsecondary Education (OPE). Information collected from grantee institutions includes fellows' individual student records. Each funded institution is responsible for identifying and selecting participants in the program.

The Annual Performance Report (APR) and the Final Performance Report (FPR) are generated from GAANN's data and analysis for reporting purposes. The APR is completed at the end of each funded year to determine successful performance of the institution. The FPR is conducted at the end of the grant, allowing the institution to show overall performance during the entire grant funding period. Institutions are provided detailed instructions on the process for accessing and completing both reports. Once the Project Director is ready to submit the report, they must include the following: grant number (PR Number) and the Project Director's name and email address to register for an account. Once registered, they will be able to proceed with the data collection.

The GAANN APR and FPR collect data (listed below) needed to report to the Department's budget services to show progress by cohort for that period. A cohort is the group of institutions approved for GAANN funding during the current award cycle. The information collected is tied directly to certain Government Performance and Results Act (GPRA) measures. The following measures will be used by the Department in assessing the performance of the GAANN program and for Department reporting:

- Graduate school completion: the percentage of GAANN fellows completing the terminal degree in the designated areas of national need.

- Time to completion: the median time to completion of master's and doctoral degrees for GAANN students.
- Employment: the percentage of GAANN fellows who have placements in faculty or professional positions in the area of their studies within one year of completing the degree.

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

This system captures long- and short-term performance data that monitor the funds allocated to recipient institutions and track the time-to-degree completion and graduation rates of GAANN fellows. System data include individual student data, financial data, graduation rate data, and employment data of all GAANN fellows.

This system contains records on individuals who apply for fellowships and receive admission to a GAANN project. This system contains information including the individual's name, gender, ethnicity, field of study, source of student's GAANN Fellowship (Federal or institutional matching), amount of stipend per year of student's GAANN Fellowship, amount of institutional contribution to tuition per year of student's GAANN Fellowship, amount of support the student received after the GAANN Fellowship (optional), year and term the student entered institution's graduate program, current education status, current employment status, cost of attendance, tuition and fees (if included in financial need), and expected family contribution. The system also collects Project Director information such as name, department, email, phone, and address information.

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

Currently Operating System

1.4. Is this PIA new, or is it updating a previous version?

Updated PIA

This PIA is being updated as part of the regular biennial review process.

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

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](#)

Contractor

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

N/A

Yes

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? Please include name and citation of the authority.

The information is collected under the authority of Title VII, Part A, Subpart 2, Section 711 of the Higher Education Act of 1965, as amended; the program regulations in 34 CFR 648; and the Education Department General Administrative Regulations (EDGAR) in 34 CFR 74.51. Further, the performance report form lends itself to the collection of quantifiable data needed to respond to the requirements of the GPRA. Grantees are required to provide the data requested in order to obtain or retain grant funding according to 20 U.S.C. 1135, 34 CFR Section 648.66.

SORN

2.2. 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

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

N/A

2.2.2. 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

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>

maintained in a system of records, or the information is not maintained by the Department, etc.

N/A

Information is retrieved by the grant's PR Number, which is a unique identifier assigned to every grant. The identifier contains a code that identifies the program under which the grant was awarded along with a number that tracks back to the original grant application. The PR Number does not directly identify the institution or any individuals associated with the institution.

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.** 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.

The records disposition schedule is ED 254 (NARA Disposition Authority: N1-441-11-001): Grant Administration and Management Files. Disposition: Records on successful applications are destroyed five years after the final payment from the Department to the institution or after completion of audit-related activities or litigation, whichever is later.

The schedule can be located here: https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-education/rg-0441/n1-441-11-001_sf115.pdf

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

Yes

3. Characterization and Use of Information

Collection

- 3.1.** 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 system contains the following GAANN fellow information, provided by the institution:

- Name
- Gender
- Ethnicity
- Race
- Institution
- Department
- Field of study

Information related to GAANN Fellowship:

- Amount of stipend per year of student's GAANN Fellowship
- Amount of institutional contribution to tuition per year of student's GAANN Fellowship
- Amount of support the student received after the GAANN Fellowship (optional)
- Year and term the student entered institution's graduate program
- Current education status
- Current employment status
- Cost of attendance
- Tuition and fees (if they were included in determination)
- Estimated family contribution

GAANN also collects Project Director information such as name, department, email address, phone number, and address.

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

Yes

GAANN collects only the minimum information necessary. Contact information, such as the individual's name, email address, and phone number, is used to communicate with the grantees. Information such as gender, ethnicity, race, and field of study is collected because GPRAs has specific requirements for applicants in fellowship programs such as GAANN.

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

GAANN collects student information directly from a participant's education institution. The information is provided by Project Directors, not students.

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

The information is collected online via a Department website. Information contained in this system is obtained from the institutions that the fellows attend. Grantees enter annual and final performance report information in the GAANN system. Information is provided to the program officer by the Project Director at the educational institution and not by the students.

- 3.5.** How is the PII validated or confirmed to ensure the integrity of the information collected?³ Is there a frequency at which there are continuous checks to ensure the PII remains valid and accurate?

The Project Director and certifying official of each institution must certify the accuracy and completeness of all information in the report. Information is collected by the institution and is gathered either from institution senior leadership or the institution financial aid office.

Use

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

The Department uses APR and FPR data to: (1) evaluate program accomplishments, (2) demonstrate program effectiveness, and (3) aid in compliance monitoring. Collecting performance report data on an annual basis provides the Department with the ability to assess each grantee's progress in meeting the program's goals and objectives and to determine compliance with the statute and program regulations. APR and FPR data have also been instrumental in determining whether grantees are entitled to continuation of funding by analyzing financial data submitted by grantees.

- 3.7.** Is the system using PII for testing/researching new applications or information systems prior to deployment or for training employees?

No

- 3.7.1.** If the above answer is **YES**, what controls are in place to minimize the risk and protect the data?

N/A

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.

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.

3.8. 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.

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

N/A

3.8.2. Specify any alternatives considered in the collection of SSNs and why the alternatives were not selected.

N/A

4. Notice

4.1. 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.

The GAANN website does not currently have a link to a privacy notice, but one will be added as a link from the [home page](#). The privacy notice is located in section 4.2.

4.2. 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.

N/A

Authorities: Collection of this information is required under the Education Department General Administrative Regulations (EDGAR) volume 75.590, 75.720, and 75.730-732 and under 2 CFR 200.328 (Monitoring and reporting program performance).

Purpose - The primary purpose of the information collected is for use in the performance monitoring of the Department of Education's (the Department's) GAANN program.

Information Collected:

- **GAANN Fellow:** Name, Gender, Ethnicity, Race, Institution, Race, Department, Field of Study.
- **Information related to GAANN Fellowship:** Amount of stipend per year of student's GAANN Fellowship, amount of institutional contribution to tuition per year of student's GAANN Fellowship, amount of support the student received after the GAANN Fellowship (optional), year and term the student entered institution's graduate program, current education status, current employment status, cost of attendance, tuition and fees (if they were included in determination), estimated family contribution.
- **Information about the Project Director:** name, department, email address, phone number and address.

Purpose: This system captures long and short-term performance data that monitor the funds allocated to recipient institutions, tracks the time-to-degree completion, and graduation rates of GAANN fellows.

Disclosures: The information will not be disclosed outside of the Office of Postsecondary Education.

Consequences of Failure to Provide information: Further funding or other benefits may be withheld under this program unless all required reports are completed and filed as mandated under the U.S. Code of Federal Regulations.

Additional information about this system can be found in the [Privacy Impact Assessment](#).

- 4.3. 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?

Project Directors submit information to GAANN voluntarily and may decline to report data. However, this may result in termination of funding for the institution if relevant information is not reported.

4.4. 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

5. Information Sharing and Disclosures

Internal

5.1. Will PII be shared internally with other ED principal offices? If the answer is **NO**, please skip to Question 5.4.

No

5.2. What PII will be shared and with whom?

N/A

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

N/A

External

5.4. 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

5.5. What PII will be shared and with whom? List programmatic disclosures only.⁴

Note: If you are sharing Social Security Numbers externally, please specify to whom and for what purpose.

N/A

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.

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

N/A

[Click here to enter text.](#)

5.7. Is the sharing with the external entities authorized?

N/A

[Click here to select.](#)

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

N/A

[Click here to select.](#)

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

N/A

[Click here to enter text.](#)

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

[Click here to select.](#)

5.11. Does the project place limitation on re-disclosure?

N/A

[Click here to select.](#)

6. Redress

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

Grantees (institutions) can log into the GAANN system and access their accounts. GAANN fellows wishing to access their own information must contact their institution. Only institutions (the grant's Project Director) update information in the GAANN system.

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

Prior to submission, grantees may make as many edits to their reports as they like. Once a report is submitted, it is locked to prevent further editing. To make changes after submission, grantees must contact their Department Program Officer or the Help Desk and request that their report be unsubmitted. GAANN fellows can make a formal request to correct information via the educational institution.

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

Grantees are notified how to correct information via an online User Guide and onscreen guidance during the report submission process.

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. Is an Authority to Operate (ATO) required?

Yes

7.3. Under [NIST FIPS Pub. 199](#), what is the security categorization of the system: **Low, Moderate, or High?**

N/A

Moderate

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

GAANN is maintained on secure computer servers located in one or more secure contractor network server facilities. Access to GAANN is limited to authorized contractors and Department employees. In accordance with the Federal Information Security Modernization Act of 2014 (FISMA) and Office of Management and Budget (OMB) policy, GAANN must receive a signed Authorization to Operate (ATO) from a designated Department authorizing official. Security and privacy controls implemented

by GAANN are comprised of a combination of administrative, physical, and technical controls.

All users accessing the system are given unique user identification. The Department requires the enforcement of a complex password policy and two-factor authentication. In addition to the enforcement of the two-factor authentication and complex password policy, users are required to change their password at least every 90 days in accordance with the Department's information technology standards. Physical security of electronic data is maintained in a secured data center, access to which is controlled by multiple access controls. Cryptographic solutions are in place to prevent unauthorized disclosure of information and to protect the integrity of data at rest and in transmission.

7.5. 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

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

Yes

7.7. 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.

The following tasks are performed to safeguard GAANN information:

- Monthly vulnerability scans performed
- Annual contingency plan test performed
- Annual self-assessments conducted; and/or annual security assessments performed by the Department Security Authorization Team
- Annual updates to system security documents
- Annual mandatory Cybersecurity and Privacy Training for employees and contractors
- Monthly Continuous Monitoring is in place with vulnerability scans (RA-05), hardware/software inventories (CM-08), and configuration management database updates (CM-06) are posted to CSAM.

System and data hosting are provided by Amazon Web Services (AWS) as a Federal Risk and Authorization Management Program (FedRAMP)-certified cloud.

8. Auditing and Accountability

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

The system owner works with the Department's Privacy Office to complete a PIA and to ensure the PIA is accurate and updated as required. The system owner also completes the Department Risk Management Framework process to secure an ATO. The system owner works with contractors to ensure the system is being used appropriately and in accordance with the practices detailed in this document.

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

Yes

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

Privacy risks associated with GAANN include unencrypted data being transmitted, lost, stolen, or compromised. Data breaches involving PII are potentially hazardous to both individuals and organizations. Individual harm may include identity theft, embarrassment, or financial loss. Organizational harm may include a loss of public trust, legal liability, or remediation costs.

The risks are mitigated by the above-mentioned safeguards, limiting access to only those with a legitimate need to know, and working closely with the security and privacy staff at the Department. To further mitigate this risk, the following safeguards have been implemented:

- Monthly vulnerability scans
- Annual contingency plan test
- Annual or ongoing security assessments

Risks are also mitigated by updating security patches per the patch scheduling and updating devices operating software, amongst other software. System patching is performed monthly, and scans are run on the production environment each month in

support of the monthly patching cycle. Collecting the minimum PII necessary to achieve the system's purpose also mitigates privacy risks.