Privacy Impact Assessment (PIA)

For the

On-Line Application System (OLAS)

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Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at privacysafeguards@ed.gov.
Introduction

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

The multiple program On-Line Application System (OLAS) allows eligible students to apply to the ED Student Volunteer Internship Program (SVIP). Eligible students are allowed to complete and submit their applications electronically. SVIP is limited to users who have been authorized and issued user ID’s and passwords by ED, is reached through ED SVIP main site, found here. OLAS is software-as-a-service procured by the Department from a vendor that specializes in application management software.

On the main site, users can view general information about the program including: introductory information about the program, quotes from previous interns, description of the different opportunities an intern might have while interning, the application process and timelines. The OLAS site provides secure access for authorized users to enter, save, update, view, approve, submit and print application information. These features can only be accessed with a valid user ID and password and require appropriate permissions set by the program. A system of access levels is implemented. Privileges are assigned on a need to know basis.

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

This information is requested in order to carry out the ED SVIP by 1) determining the eligibility of candidates and reviewing their applications in order for ED employees to make a tentative selection and for OM to verify application information, process applications and initiate OPM background check. 2) Maintaining historical records on the program for the time period and in the manner specified in the Department of Education’s Records Disposition Schedule (ED/RDS, Part 5, and Item 6).

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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.


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The OLAS system reproduces exactly the content of the existing paper-based application system, but allows applicants and school staff to submit applications electronically, through links on the Department of Education’s website. Offering an electronic application option is consistent with the Government Paperwork Elimination Act (GPEA), Pub. L. 105-277, which directs the Government to allow citizens to use electronic technologies when filing information with, or retrieving information from Federal agencies. The paper-based option for submitting applications remains available, for those without Internet access, and for those who prefer to use a paper-based system.

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

This is a new system that will replace ED’s current processes for receiving and processing student intern applications.

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 is a new PIA.

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

This system is a COTS product, specifically software-as-a-service procured by the Department of Education. It is hosted by Amazon Web Services.

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?

ED does not have specific legislation authorizing SVIP directly; however here is the Office of Human Resources (OHR) policy on volunteer interns. The policy is in accordance with 5 U.S.C. 3111. Federal agencies are responsible for regulating their programs as appropriate. Offering an electronic application option is consistent with the Government Paperwork Elimination Act (GPEA), Pub. L. 105-277, which directs the Government to allow citizens to use electronic technologies when filing information with, or retrieving information from Federal agencies.

SORN

2.2. 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.

This system is covered by the Government-wide SORN OPM/GOVT-5 - Recruiting, Examining, and Placement Records and OPM/GOVT-1 General Personnel Records.

**Records Management**

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

2.3. 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.

This information falls under GRS 1, Item 32. Merit Promotion Case Files. Records relating to the promotion of an individual that document qualification standards, evaluation methods, selection procedures, and evaluations of candidates. Destroy after OPM audit or 2 years after the personnel action is completed, whichever is sooner. (N1- GRS-79-2 item 1).

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

**3. Characterization and Use of Information**

**Collection**

3.1. 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.

The online forms collect the same information as the program’s existing paper application, and asks candidates to provide: their first name, middle name, and last name; permanent address; State of legal residence, telephone number; mailing address and telephone number if different from permanent address; personal information including date of birth; email address; country of citizenship; languages spoken; education intuition enrolled; major; GPA; type of degree pursuing; expected date of graduation; at the moment current grade (e.g. high school student, undergraduate,

\(^2\) 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](https://connected.ed.gov/om/Documents/SORN-Process.pdf)
graduate, etc.); Social Security Number (only for selected interns); Place of Birth (city and state), Other names ever used; military service; Notification of convictions resulting from a plea of nolo contendere (no contest) but omit five exemptions highlighted in Deceleration for Federal employment; if an applicant’s relatives work for the agency or government organization to which they are applying; emergency contact information including persons (full name, address with city and state, phone, relationship to applicant; signature; if applicable Alien Registration Number/USCIS number, Form 1-94 Admission Number, Foreign Passport Number with country of issuance; signature of preparer and/or translator for I-9 form.

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

Yes.

3.3. 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?³

The sources of information include the following:

- Individual students via paper and submission
- Schools via paper and electronic submission
- Individual guardians via paper and electronic submission

Use

3.4. Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above.

This information is requested in order to carry out the ED SVIP by:

- determining the eligibility of candidates and reviewing their applications in order to identify a tentative selection and collect tentatively selected interns paperwork for OM to process;
- developing and implementing the programming for the respective intern cohort; and
- Maintaining historical records on the program for the time period and in the manner specified in the Department of Education’s Records Disposition Schedule (ED/RDS, Part 5, Item 6).

The OLAS system reproduces exactly the content of the existing paper-based application system, but allows applicants and school staff to submit applications.

³ Examples include form filling, account verification, etc.
electronically, through links on the Department of Education’s website. Offering an electronic application option is consistent with the Government Paperwork Elimination Act (GPEA), Pub. L. 105-277, which directs the Government to allow citizens to use electronic technologies when filing information with, or retrieving information from Federal agencies. The paper-based option for submitting applications remains available, for those without Internet access, and for those who prefer to use a paper-based system.

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.

3.5. 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.*

Yes, the system collects SSN in order to process the perspective interns’ application system through the Office of Managements Office of Human Resources and Office of Personnel Security. This is a necessity to generate a hiring action. We have limited the number of applicants that must submit their SSN by only requiring students who have been tentatively selected by ED staff to participate in the internship program to do so.

3.6. Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

SSN is required in order to generate a hiring action. We have however taken steps to limit the number of applicants that must submit their SSN by only requiring it from students who have been tentatively selected by ED staff to participate in the internship program.

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.

Candidates are invited to apply to ED SVIP but they are not required to apply. If a candidate chooses to apply to the program, they are aware that the collection of PII is necessary in order for them to be considered for the program. Users are notified that
registration and submission of some PII is necessary because applications cannot be submitted anonymously.

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

The ED SVIP privacy policy is available at the following link:


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

If invited candidates do not want their PII used, they can choose not to complete the registration and application process. There is no opt-out option once a person's PII is already in the system.

5. Information Sharing

Internal

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

Routine programmatic disclosures listed in the Privacy Statement include the following:

- Director of ED SVIP, Office of Communications and Outreach
- ED SVIP support staff, Office of Communications and Outreach
- Internship Program Coordinators
- Office of Human Resources
- Office of Personnel Security
- ED Application Reviewers
- ED staff requesting interns

5.2. What information will be shared and with whom?

- The Office of Human Resources designated official will have full access to all information and the ability to export information into the OM secured SharePoint system for processing purposes.
- Director of ED SVIP, Office of Communications and Outreach will have access to all information, but be unable to export information.
- Internship Program Coordinators will have access to students who have been assigned to their review cue, tentatively selected by an ED employee in their program office. They will have access to all the processing packet information provided by the student as well as their resume, cover letter and student volunteer agreement. They will be unable to export information.
• Executive Management/Front Office staff will have access to students who have been tentatively selected by an ED employee in the program office(s) they serve. They will have access to all information provided by the student for processing purposes. They will be unable to export information.

• ED Application Reviewers will only have access to a limited number of students' resumes, cover letters and applications based on the Directors' placement of students into specific reviewers' cues.

• ED staff requesting interns will only have access to a limited number of students' resumes, cover letters and applications based on the reviewers and Directors' placement of students into specific program office review cues. There will also be a larger unassigned folder where all ED staff who have requested interns by a specified date will have access to view interns' documents that have not been assigned to a specific program office for review.

• Office of Personnel Security will not access this system; the Office of Human Resources designate will export the perspective intern's information from this system and into their OM Security SharePoint system for processing. It is then where OPS will access this information.

5.3. 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?

Each of the above internal organizations and units are integral to the operation of the ED SVIP both through the recruitment and processing phase. The below officials need the information because:

• Office of Human Resources designated official needs to have full access to all information and the ability to export information into the OM secured SharePoint system for processing purposes.

• Director of ED SVIP runs the program and needs to be aware of all aspects of the program and have access to obtain information if an employee is unable to attain it or unresponsive.

• Internship Program Coordinators are the program office liaisons to the Director of the program and OM and are integral members of the program. They ensure students and ED staff have a contact and the information needed to implement the program effectively and efficiently. They are interacting with the students to ensure their processing packet is completed and for programming purposes.

• Executive Management/Front Office staff review the intern processing packages for their respective office(s) for accuracy before they are released to the Office of Human Resources. This is an important step because these employees have backgrounds in HR as the IPC’s and Director do not.

• ED Application Reviewers ensure that we balance the intern needs of offices and students’ interest and skills, while working towards ensuring diversity in placements of interns into program office review cues.

• ED staff that request interns need to have the ability to review students' resumes, cover letters and applications that were placed in their offices review cue in order to interview and make a tentative selection.

• Office of Personnel Security initiates the background check required
for all students and collects fingerprints required for the OPM background investigation.

External

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

The Department of Education may disclose information contained in a record in an individual’s account under the routine uses listed in the Privacy Act System of Records Notice without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Specific routine uses listed in the Privacy Statement include the following:

- Disclosure for Use by Law Enforcement Agencies;
- Enforcement Disclosure;
- Litigation and Alternative Dispute Resolution (ADR) Disclosures;
- Disclosure to the DOJ;
- Employment, Benefit, and Contracting Disclosure;
- Employee Grievance, Complaint or Conduct Disclosure;
- Freedom of Information Act (FOIA) Disclosure;
- Contract Disclosure; and
- Congressional Member Disclosure.

5.5. What information will be shared and with whom?

N/A

5.6. 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

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

N/A

5.8. 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

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

No
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

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

No

6. Redress

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

Users are provided with login credentials to access the system containing their information.

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

Users may edit most fields. If a field is not editable, the user is instructed to call or email ED SVIP to correct the information.

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

Users are provided opportunities to edit fields in the system and are instructed to call or email ED SVIP to correct information that can only be edited by an administrator.

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

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

A system of access levels is implemented. Privileges are assigned on a need to know basis.

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

ED OCO personnel (staff and contractors), systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate 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.

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

Yes

7.5. Is the system able to provide an accounting of disclosures?

Disclosures from this system are unlikely to be made, except in furtherance of the primary purpose of the system. If any nonstandard disclosures were to be made for any unanticipated reason, the system owner would maintain a record of the disclosures with the required data elements such as date of the disclosure and recipient of the disclosure to include mailing address, content of the disclosure, and purpose of the disclosure.

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?

ED OCO personnel (staff and contractors), systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate Application which include administrative, technical and physical controls.

8.2. What are the privacy risks associated with this system and how are those risks mitigated?
ED OCO personnel (staff and contractors), systems and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate 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.