



Privacy Impact Assessment (PIA) for the

Historically Black Colleges and Universities (HBCU) Competitiveness Scholars

Mar 13, 2019

This PIA was originally approved on Nov 20, 2018 and reviewed on Mar 13, 2019 by the system owner certifying the information contained here is current and up to date.

Contact Point

Contact Person/Title: Sedika Franklin, Associate Director

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System Owner

Name/Title: Sedika Franklin

Program Office: Office of the Under Secretary (OUS)

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

The White House Initiative on Historically Black Colleges and Universities HBCU Competitiveness Scholars

Comprised of undergraduate, graduate, and professional students, applicants are nominated to be recognized for successfully preparing to compete for top opportunities that improve standards of living. Once selected, Competitiveness Scholars will learn and share proven and promising practices that support individual and HBCU competitiveness over the course of a year. Throughout this period, the Initiative will provide outreach and engagement activities, as well as information and resources that can be disseminated to fellow students. They are expected to fully take advantage of the opportunities provided, engage with one another and showcase individual and collective talents across the HBCU spectrum.

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

The information collected: resume, unofficial transcript and endorsement letter, are used to verify the student is enrolled in school and a distinguished leader on their campus. Hard copies of nomination forms are filed and locked in a cabinet for reference. Once the scholars are accepted in the program, email addresses are used to communicate with students. Grade and major are used to help pair students with opportunities that may arise via partnerships established at the Initiative. Student essays are used to help pair them with federal agency representatives for professional development.

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 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? If this is an update, please include the publication date of the original.

New PIA

Original Publication Date:

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

Agency

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?

Executive Order 13779—White House Initiative To Promote Excellence and Innovation at Historically Black Colleges and Universities

Signed on February 28, 2017

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? 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 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.

NARA DISPOSITION AUTHORITY: N1-441-09-6

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 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 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.

Name, gender, email, address (residential and mailing), phone number, hometown, name of HBCU currently attending, graduation date, major, grade point average, academic status (sophomore, junior, senior, graduate, or doctoral), and academic and career interests, are collected on the student being nominated. Additionally, an unofficial transcript, resume, endorsement commitment letter, and a student interest essay describing their academic achievements, civic/campus engagement, entrepreneurial ethos, personal and career aspirations/needs, institutions' and communities' aspirations and needs and their ideas on how the WHIHBCU and their recognition of a competitive scholar will support those aspirations and needs.

Also collected is the name, title, phone number, email, and school mailing address of the President or Chancellor of the HBCU which the nominated student attends.

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

The individual student submits his or her own nomination package which is endorsed by their institution president.

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

All nominations are completed on a form and submitted via email.

3.5 How is this information validated or confirmed?³

President or Chancellor of the student's college/university must provide a signed written nomination attesting to the nominee's current performance, potential for a leadership and institutional endorsement commitment.

Additionally, transcripts are used to verify student's current enrollment and good standing.

³ Examples include form filling, account verification, etc.

Use

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

Nomination Form: The nomination form provides general information about the nominee; provides additional information on required elements of the completed package and identifies the nominee and the President or Chancellor.

Transcript: The unofficial transcript is an important piece of the review process at The White House Initiative on HBCUs. With each transcript, the WHIHBCU Staff will take a close look at a nominee's current enrollment status and grade point average.

Common Application Essays: The essay is an important piece of the application as this allows for additional meaningful information from the nominee. We will use the short essay to learn more about the nominee on the personal level. From the essay, the WHIHBCU Staff hopes to gain an understanding of what issues are important to the nominee.

Endorsement/Commitment Letters: Endorsement/commitment letters play an important role in the holistic application review process. For all applications, one letter endorsed by HBCU President or Chancellor is required. The HBCU President but also sign the nominee's application. The endorsement/commitment letter should provide helpful context of the nominee.

3.7 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?

3.8 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 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 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.

The system provides a written privacy act notice on the collection.

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

<https://sites.ed.gov/whhbcu/files/2019/02/2019-WHIHBCU-Scholars-Nomination-Form-.pdf>

Privacy Act Statement

Authority - This information is being collected under the authority of Presidential Executive Order 13779, Promoting Excellence and Innovation at Historically Black Colleges and Universities (February 28, 2017).

Purpose - The primary purpose of the information collected is to administer the White House Initiative on Historically Black Colleges and Universities' (Initiative) Competitiveness Scholars Program. The information is reviewed and then used to determine the eligibility of candidates, make a tentative selection, verify application information, process applications, and to inform the general public of the individuals who receive the recognition.

Disclosures - The information you provide will ordinarily not be disclosed outside of the Department, except to inform the general public of the individuals who receive recognition pursuant to the disclosures identified in the PIA titled, "Historically Black Colleges and Universities (HBCU) Competitiveness Scholars."

Participation - Providing the personal information requested is voluntary; however, failure to provide this information may result in ineligibility for participation in the program or delays or errors in the processing of the application you have completed. It may eventually prevent us from offering you recognition by the Initiative.

For additional information about our information practices regarding this system, please see our Privacy Impact Analysis: <https://www2.ed.gov/notices/pia/pia-oushbcu-competitivescholars.pdf>

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

Providing information is completely voluntary; individuals who choose to opt out do not apply for the recognition.

5. Information Sharing

Internal

5.1 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.

Yes

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

A list of the 2018 WHIHBCU Competitiveness Scholars, in alphabetical order by hometown state, the school they attend and the school's location is created and shared with the Press Office to share with the general public via a press release.

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?

We share the information with an internal office for the purpose of informing the general public of the individuals who receive recognition.

External

5.4 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.

Yes

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.

A list of the WHIHBCU Competitiveness Scholars, in alphabetical order by hometown state, the school they attend and the school's location.

A list of the WHIHBCU Competitiveness Scholars, by name which includes their major and institution is shared during National HBCU Week as scholars are recognized in-person.

This list is posted on the Initiative website for viewing by the public; shared on a mailing list with Congressional members who may want to formally congratulate students from their respective districts; shared on a mailing list with the general public and presented verbally during the National HBCU Week Conference each September.

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?

To inform the general public of the individuals who receive the recognition. Shows caliber of HBCU talent.

The information collected: resume, unofficial transcript and endorsement letter, are used to verify the student is enrolled in school and a distinguished leader on their campus. We share the specified information with the general public to inform them of the individuals who are receiving recognition for being competitive students. This information when shared also shows the caliber of diverse HBCU talent. Grade and major are used to help pair students with opportunities that may arise via partnerships established at the Initiative. Student essays are used to help pair them with federal agency representatives for professional development.

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

Each year the President of the United States issues a proclamation designating a week in September to call upon all public officials, educators, librarians, and Americans to observe with appropriate programs, ceremonies, and activities the achievements HBCUs and their graduates make to our country.

The Annual National Historically Black Colleges and Universities (HBCUs) Week Conference is planned under the leadership of the White House Initiative on HBCUs (Initiative) and with input from the Executive Office of the President and U.S. Department of Education. It is the pinnacle event hosted by the Initiative and provides a forum to exchange information and share innovations among and between institutions.

Competitiveness Scholars assembled at the 2018 National HBCU Week Conference to be recognized by the HBCU community and to participate in workshops designed to improve leadership, encourage ongoing personal and professional development and discover areas of innovation and entrepreneurship.

The specified information is included in the official conference program as a written reminder of the students that each participant supports. The specified information shows the diverse student talent at HBCUs across the nation.

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**.

No

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

No

6. Redress⁴

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

Individuals may request access to their own information via email to the White House Initiative on HBCUs. They are permitted to visit the office in person to retrieve their information.

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

Individuals may update their applications up to and no later than the application deadline set forth by the Initiative.

Selectees are asked to verify their contact information once notified.

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

We use the phone number or email included on their nomination form to communicate with individuals about procedures for correcting their information.

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? Please answer **YES** or **NO**.

Yes

7.2 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?

Users must be employed by the Initiative and work in support of the program to access the information.

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

Files are maintained in a locked file cabinet and on the K: Drive, which is only accessible by those employed by the Initiative.

Nomination packages are received via email. Those electronic email files are stored in an ED outlook file that is only accessible to those employed by the Initiative.

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

No

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

Yes

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

No

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

Once stored and filed there are no other monitoring or testing procedures that take place.

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?

As appropriate, discuss how new or existing information controls are strengthened to ensure that the information is used appropriately, not accessed inappropriately or by someone unauthorized to access the information. The system records do not leave the immediate office of the system owner and only one printed copy is maintained in the locked file cabinet. The system owner follows the rules of the Records Management schedule for maintaining and destroying information.