



Privacy Impact Assessment (PIA)
for the

HEA Title II State Reporting System (T2SRS)
December 29, 2020

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: Terri Myers/ISSO
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System Owner

Name/Title: Freddie Cross
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 Higher Education Act (HEA) Title II State Reporting System (T2SRS) supports the HEA Title II program, which gathers teacher quality data from the states in support of an annual report to Congress. Reports and data are made available to the public through a web site located at <https://title2.ed.gov>. The data are collected by states from postsecondary institutions, alternative route teacher preparation programs, testing companies, and the states' own accountability systems. The data are reported by the 50 states, the District of Columbia, Puerto Rico, and other U.S. territories. Note that no identifiable information is collected or reported on individual teachers.

Title II of HEA authorizes new federal grant programs that support the efforts of states, institutions of higher education (IHEs), and their school district partners to improve the recruitment, preparation, and support of new teachers. Title II also includes accountability measures in the form of reporting requirements for institutions and states on teacher preparation and licensing. The reported data include how institutions prepare teachers, what states require of individuals before they are allowed to teach, and how institutions and states are raising their standards for the teaching profession. These data measure the progress of teacher education programs and state efforts to improve teacher quality.

The T2SRS includes the public web site, a state data entry application, an IHE data entry application, a data mining and reporting ("data tools") application, a project file share, and associated development and staging/testing environments.

Data flow through the system follows the path defined in the Title II reporting requirements. Data flows from the various education institutions to the state education agencies using the IHE data entry application. The states then assemble and submit their data to the Department using the state data entry application of the T2SRS. Some data are submitted as files which can be uploaded or emailed to project staff for uploading. Uploaded files are processed to extract the data and import them into the T2SRS database. Data are also entered and edited using extensive online forms and instruments, which make up the majority of the data entry applications. Project staff also edit the data using the data entry applications.

Business contact information is collected for a primary contact at the state education agencies for use in administering the collection and reporting of data. The business contact can choose to display or not to display this contact information on the public website. Business contact

information is also collected from the educational institutions but this information is not displayed on the public website.

After the state data are uploaded, data are extracted from the database, analyzed, and assembled into the tables and text that are used in the annual report and released to the public. The text, tables, reports and files are then made available through the public web site. The annual report is delivered to OPE for approval and submission to Congress.

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

State education agencies and educational institutions submit primary contact name and work information for administration of the project. The state education agency may choose to display their contact information on the public website; the information from educational institutions is not displayed on the public website. No individual teacher information is collected or maintained in this system.

- 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

The prior PIA was completed and posted in 2008. It is being updated as part of the regular review process, and to post it in the Department's current PIA template.

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

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

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](#)

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 data is collected and used pursuant to the authority in Title II (Sections 205 through 208) of the *Higher Education Act*. The *Higher Education Opportunity Act* (Public Law 110-315) (HEOA) was enacted on August 14, 2008, and reauthorizes the *Higher Education Act of 1965, as amended* (the HEA). The HEA Title II program gathers teacher quality data from the states in support of an annual report to Congress, and authorizes new federal grant programs that support the efforts of states, IHEs, and their school district partners to improve the recruitment, preparation, and support of new teachers.

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

N/A

Information is not retrieved using an individual name or other identifier.

Records Management

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>

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 Department of Education records schedule is 254: Grants Administration and Management Files (N1-441-11-001). Records are destroyed 10 years after last action is taken on the file, but longer retention is authorized if required for business use.

- 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 information collected is business contact information for contacts at state education agencies and educational institutions. The information collected is name, title, organization/institution name, business address of organization/institution, business phone and fax, and business email address. The state education agency may choose to display, or not to display, the contact information on the public website; the information for educational institutions is not displayed.

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

Yes

T2SRS collects only the minimum information necessary to administer the program. Contact information is needed to communicate with the institutions and state agencies. No information is collected that is not required to achieve these purposes.

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

The state education agencies and educational institutions provide the information.

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 through forms on the website.

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 state education agencies and educational institutions provide the information and any updates or corrections. Errors are identified if the Department is unable to contact the agencies and institutions. These agencies/institutions provide data and updates on at least an annual basis.

Use

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

State education agencies and educational institutions submit primary contact name and work contact information for project administrators to contact the agencies/institutions if needed. State education agencies may also choose to display their information on the public website for use by the general public.

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

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 Examples include restricted form filling, account verification, editing and validating information as it's collected, and communication with the individual whose information it is.

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.

No

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 data are provided voluntarily to provide work contact information for the state education agencies and educational institutions to support the administration of the program. The state education agencies are also provided with an option to display their information on the public website.

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

The state education agencies are provided with a simple checkbox on the work contact information collection screen to indicate “Public Contact”. If checked, the information is displayed on the public website. This indication can be changed at any time by the state education agency through the T2SRS; or by contacting the project personnel at (877) 684-8532 or title2@westat.com and an administrator can change the selection.

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?

The information is provided voluntarily by the state education agencies and educational institutions to provide work contact information for administrators of the project. The state education agencies can also choose to display, or not to display, the information to users of the public website.

- 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.

Yes

- 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

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.

whom and for what purpose.

N/A

If a state education agency so chooses, work contact information for the primary contact will be displayed on the public website. This information is not provided elsewhere.

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

N/A

The contact information is shared for use by users of the public website.

5.7. Is the sharing with the external entities authorized?

N/A

Yes

The state education agency authorizes the sharing of the work contact information.

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

N/A

Yes

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

N/A

The work contact information is displayed on the public website.

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

No

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

N/A

No

6. Redress

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

The state education agencies and educational institutions have access to and may update their information at any time.

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

The state education agencies and educational institutions have access to and may update their information at any time.

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

The state education agencies and educational institutions have access to and may update their information at any time. No explicit instructions or procedures are provided to the state education agencies or educational institutions for correcting their information. Data is collected and reported by the state education agencies and educational institutions through the T2SRS on an annual basis, and it is incumbent on the agencies/institutions to ensure their information is correct.

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

Low

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

T2SRS only supports secure communication protocols for both T2SRS users and the T2SRS application/website. All personnel working with the T2SRS agree to established rules of behavior. Personnel in system administration and support roles must successfully complete personnel background screening for moderate risk and complete additional training including role-based, incident response, and disaster recovery training.

Physical security of electronic data will be maintained in a secured data center, access to which is controlled by multiple access controls. T2SRS technical and administrative controls are in compliance with the Federal Information Security Management Act (FISMA) and with National Institute of Standards and Technology (NIST) standards and guidelines. The T2SRS has been certified and assessed at a FISMA LOW level by the Department and documented in an authorization to operate (ATO).

The system is hosted entirely by a contractor, Westat, at the main computer center at the corporate campus in Rockville, MD. It does not include any government furnished equipment (GFE), government furnished software, dedicated hardware, dedicated software, or virtual systems.

The system stores, processes, and transmits all project information in whatever form. Secure spaces and containers, staff offices, and data centers are located at Westat's corporate campus on Research Boulevard in Rockville, MD. Two data centers, each in a separate building across the campus from one another, host project systems and provide local and external connectivity. The data centers operate 24 hours a day, 7 days a week, with operators on site every day, including late evening shifts during the week.

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.

T2SRS is authorized for operation in accordance with the Department's Security Authorization Program. As part of the ATO granted by the Security Authorization Program, T2SRS will be required to comply with both the current version of NIST Special Publication (SP) 800-137, Information Security Continuous Monitoring (ISCM) for Federal Information Systems and organizations and the Department's Information Security Continuous Monitoring Roadmap.

Examples of testing or evaluation include weekly vulnerability scans and mitigation of vulnerabilities within the times specified by the Department. Annual application scans, and mitigation of vulnerabilities within specified times, are also performed – these application scans are performed more frequently depending on programming updates to the application/site. The Department also performs annual assessments on applicable security controls.

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 T2SRS system owner ensures that the information is used in accordance with stated practices in this PIA by completing the Department’s Risk Management Framework process and receiving an ATO. Under this process a variety of controls are assessed by the Department on at least an annual basis to ensure the T2SRS application and the data residing within are appropriately secured and protected.

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?

This PIA details the privacy controls and safeguards implemented for this system in order to mitigate privacy risk. These controls and safeguards work to protect the data from privacy threats and mitigate the risks to the data.

The information collected is name and work contact information, the minimum necessary to achieve the purpose of contacting the agencies and institutions that submit information. This information is posted to the public-facing website and is not intended to be kept private. No additional personal information is collected.

Role-based access controls are implemented to ensure access to data are restricted to authorized users only. System logs record attempted unauthorized access to stored information. Access to monitoring and auditing related information is limited to authorized administrative personnel.