Privacy Impact Assessment

for

Teach.gov Web Site

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U.S. Department of Education

1. System Information. **Describe the system** - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

The U.S. Department of Education ("ED") is launching a new web site to be called the "Teach.gov Web Site" or "Teach.gov". This web site will support information dissemination for a teacher recruitment campaign (aka TEACH campaign) intended to elevate the status of the teaching profession and to connect potential teacher candidates to information on teacher employment, scholarships, teacher preparation programs, and pathways to teaching. Teach.gov and its associated social media outlets will act as a one-stop clearinghouse for engaging, informing, and interacting with potential teachers through the use of pertinent listings of job sources, scholarship opportunities, and teacher preparation programs.

Teach.gov will launch in September 2010 with an initial set of offerings: static information pages, inspirational videos, and the ability to create a user account on Teach.gov. Beyond the initial launch, new features will be released on Teach.gov on a periodic basis during the months to follow. These features will support the TEACH campaign as mentioned above.

The company with which ED has contracted to provide computer equipment and networking services for Teach.gov is American Data Technology, Inc. (ADTI). Teach.gov data will be hosted within a MySQL database that ADTI hosts. Visitors to Teach.gov will be able to sign-up to create a user profile. This information will be used to offer personalized content, such as the locations of teacher preparation institutions and teacher job listings, based on zip code. Also, users will be able to opt-in for Teach.gov e-mail lists. To opt-in, a user will need to provide his or her e-mail address. If users do not wish to create a user profile, users may e-mail themselves search results from Teach.gov without creating a personalized account.

Teach.gov has developed the following social media outlets: a Facebook Fan Page (Facebook Page) LinkedIn, Twitter, MySpace, Flickr, BlackPlanet.com, and MiGente.com to compliment the site and further engage potential and current teachers. Facebook is a social networking web site that is operated and privately owned by Facebook, Inc. Users can add friends, send them messages, and update their personal profiles to notify friends about themselves. While Facebook and other social media outlets are external websites, the Facebook Page and other social media outlets will be controlled and continually moderated by the Teach.gov team.

2. **Legal Authority.** **Cite the legal authority to collect and use this data.** What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

The FY 2009 appropriation for the School Improvement Program, authorizes the Secretary of Education to establish a national initiative, such as the TEACH campaign, to improve the recruitment, training, mentoring, retention, and placement of teachers and principals in order to improve educational outcomes. The authorizing statute are 20 U.S.C. §6603(b) [Pub. L. 89-10, Title II, §2103, as added by Pub. L. 107-110, Title II, §201, January 8, 2002] and Public Law 111-8, Division F, Title III, March 11, 2009 [Omnibus Appropriations Act, 2009, Div. F, Title III].

3. **Characterization of the Information**. **What elements of Personally Identifiable Information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)?** What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

A. Non-Personally Identifiable Information Collected From All Visitors

i. Visitors to this website who have javascript enabled are tracked using **Google Analytics and single-session cookies**. Google Analytics collects the following types of information from users:

- Type of user agent (web browser) used, software manufacturer, and version number;
- Type of operating system;
- Screen colors (color processing ability of the user's screen);
- Javascript support;
- Flash version;
- Screen resolution;
- Network location and IP address, which can include country, city, state, region, county, or any other geographic data;
- Hostname
- Bandwidth (internet connection speed);
- Time of visit;
- Pages visited;
- Time spent on each page of the website;
- Referring site statistics
  - The website (URI) the user came through in order to arrive at this website (example: clicking on a hyperlink from Yahoo.com that took the user to this website)
  - Search engine query used (example: typing in a phrase into a search engine like Google, and clicking on a link from that search engine)

ii. Google Analytics data is shared with Google. For more information on Google's Privacy Policies, visit: http://www.google.com/intl//privacypolicy.html

iii. Google Analytics **DOES NOT** include any personally identifiable information, such as:

- Names
- Phone Numbers
- E-mail Addresses
- Mailing Addresses

- Social Security Numbers
- Bank Account Numbers
- Credit Card Information

B. Information Collected from Users Who Voluntarily Register on This Website

The following elements from web site visitors will be voluntarily collected for the initial version of Teach.gov. This information will be collected via a sign-up form on the web site.

- Zip Code
- E-mail Address
- Password
- Checkbox for opt-in e-mail notifications
- Checkbox for agreement to terms of service

Users may elect to customize the teach.gov website by submitting their zip codes, e-mail addresses, and selecting passwords. If they do this, they will be able to store searches of job listings, scholarships, and teacher preparation programs.

Zip code may be used to offer information (college/universities, licensure and job listings) on the web site based on general location.

Users visiting the social media venues that will be used to support the TEACH campaign do so entirely voluntarily, and therefore, any PII displayed on these venues has been provided voluntarily by users. On the Faceboook Page and other social media outlets, the Department will not place any content that contains PII. However, the information that is displayed on the Facebook Page and other social media outlets, which is voluntarily provided by a user, may or may not contain PII. For example, becoming a fan on the Facebook Page requires a fan to have his or her own Facebook profile page. This individual page has a location to display a name and photo. Some individuals choose to list their real names and to provide clear photos of themselves, while others choose to list non-identifying user names and load non-identifying photos. No absolute characterization can be provided in this Privacy Impact Assessment about the PII that might voluntarily be posted by Facebook users or other social media outlets over the course of their interactions. The extent of PII that is revealed about a user is up to the discretion of each individual user.

4. **Why is the information collected? How is this information necessary to the mission of the program, or contributes to a necessary agency activity**. Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.

ED will use the information collected to connect potential teachers with resources to help them as they advance down their career paths. Zip code is needed for a sense of location in order to filter searches; e-mail address for contacting a visitor if he or she opts-in to the teach.gov e-mail list-serve, to allow a visitor to send himself or herself search results, and to serve as a username; and a username (i.e., e-mail address) and password to manage a visitor's settings and to save searches.

The Facebook Page and other social media outlets will provide an additional delivery method for ED to connect with potential and current teachers. Information provided by visitors to the Facebook Page will be displayed if the visitor voluntarily provides a comment or posts information.

5. **Social Security Numbers - If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures.** Also specify any alternatives that you considered, and why the alternative was not selected.

Social security numbers will neither be requested nor collected on Teach.gov.

6. **Uses of the Information. What is the intended use of the information?** How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? If the system uses commercial information, publicly available information, or information from other Federal agency databases, explain how it is used.

This collected information may be used in the following ways:

A. **Teach.gov User Account** – E-mail address and password will create a user account on Teach.gov. This account will allow a user to create and modify e-mail preferences and save searches for teacher preparation institutions, job listings and scholarship information.
B. **Communication** – E-mail address will be used to send notifications to users. These notifications may be for web site updates, publically available job fairs/events in a region and other timely events for which the user has opted-in.
C. **Filtered Searches** – Using the zip code element, we may provide filtered searches for teacher preparation institutions, state licensure locations, and other geographic information.
D. **Facebook Page / Social Media** – The Facebook Page and other social media outlets will feature information about the TEACH campaign and other Department initiatives. Any PII will be submitted voluntarily, and the Facebook Page will be reviewed and monitored by the Teach.gov team. ED is using third-party social media sites to provide ED content in formats that may be useful or interesting; however, TEACH.gov and ED.gov are the official sources of information from the U.S. Department of Education. ED cannot attest to the accuracy of other information provided by any linked third party sites. Using these third-party sites does not constitute an endorsement by ED or any of its employees of the sponsors of the sites or the information or products presented on the sites. Also, please be aware that the privacy policies that apply toTEACH.gov are not be applicable on these third-party sites. To the extent feasible, social media outlets used in support of the TEACH campaign will contain links to the TEACH.GOV Privacy Policy.
E. **Links to Other Sites** – ED's privacy policy discusses the privacy policies for the TEACH website. But TEACH.GOV provides links to other websites. When you leave the ED website (www.teach.gov), you will be going to sites that are beyond ED's control. We try to ensure that links that leave ED's website are clearly labeled either with a pop-up window or in the case where multiple external links may appear, labeling will be included prominently above such links. These other sites may send their own cookies to users, collect data, or solicit personal information. The privacy policies and procedures described here for TEACH.gov do not apply to any external links. We encourage you to read the privacy policies of any site you link to from ours, especially if you share any personal information. Be informed. You are the person best qualified to protect your own privacy.

F. **Social Media** – ED is using third-party social media sites to provide ED content in formats that may be useful or interesting; however, Teach.gov and ED.gov are the official sources of information from the U.S. Department of Education. ED cannot attest to the accuracy of other information provided by linked sites. Using these third-party sites does not constitute an endorsement by ED or any of its employees of the sponsors of the sites or the information or products presented on the sites. Also, please be aware that the privacy policies at Teach.gov differ from the privacy policies applicable on these third-party sites.

7. **Internal Sharing and Disclosure. With which internal ED organizations will the information be shared?** What information is shared? For what purpose is the information shared?

Individual records will not be shared internally outside of the TEACH campaign team. Aggregate, anonymized data, such as number of sign-ups by state, may be shared with other ED offices in order to provide project status.

8. **External Sharing and Disclosure. With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)?** What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?

ED's site management contractors for marketing Teach.gov, Rock Creek Strategic Marketing, will have access to the collected data. Rock Creek Strategic Marketing has signed a Non-Disclosure Agreement with ED and will not share this information with other parties without explicit written permission from ED. Rock Creek Strategic Marketing will be using this information to send e-mail notifications from the Teach.gov web site and to analyze geographic distribution of our visitors.

ED also may send this information to a third-party bulk e-mail service to distribute e-mail notifications. ED will require any such third-party provider to sign a non-disclosure agreement before any PII is disclosed and will ensure that the provider's computing environment meets ED's security standards.

9. **Notice. Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)?** What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?

A privacy policy notice will be available to all users of Teach.gov via the footer on all web pages. A user account is not required to use the Teach.gov, and it will be solely up to the user to decide whether or not to create such an account. To create an account, a user must click on "Stay in Touch" and enter in e-mail address, password, and zip code. A user will have the opportunity to review a privacy policy before signing up to Teach.gov. A user will be made aware of the opt-in e-mail policy for notifications and will be provided with the opportunity to remove himself/herself from further mailings.

10. **Security.** **What administrative, technical, and physical security safeguards are in place to protect the PII?** Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?

The company providing computer equipment and networking services for Teach.gov is ADTI. ADTI is the same provider for the primary ED.gov web site, and its facility and same types of software, hardware and networking components that will be used with Teach.gov have been approved for ED.gov in accordance with ED's Information Security standards and procedures. ED.gov has completed a Certification and Accreditation (C&A) survey, and the Teach.gov C&A survey is underway, pending completion within the next 90 days. ADTI has 24 hour/7 days a week hardware and security monitoring in place for the ED web server infrastructure. ADTI has firewalls in place for the ED web server infrastructure, only granting access to network ports for the public as necessary for public access to the web site. ADTI has an audit procedure in place for system changes.

A limited number of pre-determined individuals from the Rock Creek Strategic Marketing contracting team will have access to the Teach.gov environment, each requiring a Moderate Risk (5C) or higher personnel security clearance before being granted credentials to login. A pre-determined list of system administrators from ADTI will have access to the Teach.gov web site and database for system maintenance and upkeep purposes. The ADTI system administrators that have access to Teach.gov also will have to have a Moderate Risk (5C) or higher personnel security clearance. Both Rock Creek Strategic Marketing and ADTI must use usernames and passwords to access the system.

11. **Privacy Act System of Records.** **Is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a?** Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?

A System of Records, as defined by the Privacy Act, is not being created at this time, and the notice and reporting requirements in OMB Circular No. A-130, Appendix I, do not apply at this time. This Privacy Impact Assessment will be updated if collected system of records is created.

12. **Records Retention and Disposition.** **Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected?** If yes – provide records schedule number:

Non-Personally Identifiable Information collected from all users (i.e., Google Analytics data) is maintained in accordance with General Records Schedule (GRS) 20, Item 1(c). Records are deleted/destroyed when the agency determines they are no longer needed for administrative, legal, audit or other operational purposes.

Information collected from registered users (e-mail address, password, and zip code) is maintained according to GRS 24, Item 6.

PII that becomes available through the use of third-party social media sites will be used solely by authorized individuals in the performance of their duties in responding to your feedback as part of a conversation. When a user of social "makes PII available", retention may be maintained according to

records management schedules when they are no longer needed for administrative, legal, audit, or other operational purposes (GRS 20, Item 1(c) or per GRS 23, Item 7 (up to three (3) months), whichever is greater.

13. **Privacy Risks From Third Party Websites and Applications. What other privacy risks exist from the use of third party websites and applications and how the agency will mitigate those risks?**

ED will mitigate the risk of using third party social media sites by:

- We will mitigate the risk of using third-party social media sites by: (a) directly linking to this privacy notice from the social media site, if possible; (b) including links on the TEACH.gov Website to our official social-media pages and accounts; (c) using the TEACH.gov logo on our social media pages and accounts to make it clear that this is an ED site related to the TEACH campaign; and (d) providing comparable information and services through the TEACH.gov Website or other official means. For example, members of the public will be able to learn about ED's activities and to communicate with ED without having to join a third-party social media website. In addition, if ED uses a third-party service to solicit feedback, ED will provide an alternative government e-mail address where users can also send feedback.

Users may opt out of Google Analytics by disabling JavaScript within your browser or using the Google Analytics Opt-Out Browser Add-On. Disabling Google Analytics or JavaScript still permits you to access comparable information or services. To disable JavaScript, refer to your vendor's browser instruction guide (e.g., Internet Explorer, Mozilla Firefox).

To opt out of cookies, users should refer to http://www.usa.gov/optout_instructions.shtml, which contains general instructions on how the public can opt out of some of the most commonly used web measurement and customization technologies.