



Privacy Impact Assessment (PIA) for the

Impact Evaluation of Departmentalized Instruction in Elementary Schools

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This PIA was originally approved on Jan 9, 2018 and reviewed on Jan 9, 2018 by the system owner certifying the information contained here is current and up to date.

Contact Point

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System Owner

Name/Title: Mathematica Policy Research, Inc.

Program Office: Institute of Education Sciences (IES)

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 Impact Evaluation of Departmentalized Instruction in Elementary Schools does not include an IT system but involves collecting personal identifiable information. The collected information will be used to conduct a rigorous study of the effectiveness of elementary teachers specializing in one subject (departmentalization) relative to the more traditional approach of teaching all subjects. The project will include personal identifiable information of teachers who voluntarily participate in the evaluation and will include, but will not necessarily be limited to teacher name, videos of classroom practice and ratings of teaching practice conducted by the study team using the videos, background characteristics, teaching experience, time spent on instruction, planning, and professional development, satisfaction and confidence in teaching, and opportunities to coordinate with other teachers. The project will also include personal identifiable information of the students in the participating teacher classrooms and will include, but will not necessarily be limited to standardized Math and English/Language Arts test scores, age, sex, race/ethnicity, grade, eligibility for free/reduced-price lunches, English Learner status, and individualized education plan status. Teacher survey responses will be collected electronically to improve the efficiency of the data collection and for the convenience of teachers.

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

Data will principally be used to describe how schools in the study decide to structure departmentalized instruction and any perceived challenges of transitioning to departmentalized instruction in grades 4 and 5. It will also be used to estimate the impact on student achievement and teacher practices of departmentalizing instruction. Teacher survey responses will be collected electronically to improve the efficiency of the data collection and for the convenience of teachers. Data from district records will also be collected through a secure electronic transfer. The findings from this evaluation will be used to inform effective teacher and school improvement strategies. The findings from the study will be presented in a written report and shared with relevant Department of Education offices. The data from the evaluation with personal identifiable information will not be shared, either internally or externally. Data analysis will be conducted using data that has been stripped of all individual identifiers (e.g., names), other than encrypted identifiers. Data and results that are reported or released will not contain PII. Any disclosures will be made only to the extent that they are compatible with the statutory and program purposes for which the records were collected or are otherwise authorized by the Privacy Act.

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?

New 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?

Contractor

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?

The study is authorized under sections 171(b) and 173 of the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563) and section 8601 of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (20 U.S.C. 7981).

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**.

Yes

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.

The project does not include an IT system but does collect PII. The name of the system of records notice is, "Impact Evaluation of Departmentalized Instruction in Elementary Schools" (18-13-44).

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.

The Department shall submit a retention and disposition schedule that covers the records contained in this system to the National Archives and Records Administration (NARA) for review. The records will not be destroyed until such time as NARA approves said schedule.

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.

The project will collect PII of teachers who voluntarily participate in the evaluation and will include, but will not necessarily be limited to teacher name, videos of classroom practice and ratings of teaching practice conducted by the study team using the videos, background characteristics, teaching experience, time spent on instruction, planning, and professional development, satisfaction and confidence in teaching, and opportunities to coordinate with other teachers. The project will also collect PII of the students in the participating teacher classrooms and will include, but will not necessarily be limited to standardized math and English/Language Arts test scores, age, sex, race/ethnicity, grade, eligibility for free/reduced-price lunches, English Learner status, and individualized education plan status. Finally, the PII will include contact information such as name, home address, and home phone number to facilitate follow-up data collection.

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 study includes data from individuals (teachers) who voluntarily participate in the evaluation. The data collected will also include personally identifying information of the students in the participating teacher classrooms, including standardized math and English/Language Arts test scores, age, sex, race/ethnicity, grade, eligibility for free/reduced-price lunches, English Learner status, and individualized education plan status.

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

The districts and schools have volunteered to participate in the evaluation. Teacher survey responses will be collected electronically in order to improve the efficiency of the data collection effort and for the convenience of teachers. Data from district records will also be collected through a secure electronic transfer.

3.5 How is this information validated or confirmed?³

All data undergo consistency and quality-control checks.

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.

The information collected will principally be used to describe how schools in the study decide to structure departmentalized instruction, as well as any perceived challenges of transitioning to departmentalized instruction in grades 4 and 5. It will also be used to estimate the impact on student achievement and teacher practices of departmentalizing instruction. More specifically, the study will address the following central research questions: What is the impact of departmentalization in grades 4 and 5 on student achievement and teacher practices? Do the impacts of departmentalization differ based on whether principals have access to teacher effectiveness scores when assigning teachers to subjects? Secondary research questions for the study are: How do schools structure departmentalization? What challenges and benefits do principals and teachers perceive in switching to departmentalization? How do principals' actual assignment of teachers to subjects compare with assignments based solely on baseline teacher effectiveness scores? The findings from this evaluation will be used to inform effective teacher and school improvement strategies.

3.7 Is the project using information for testing a system or for training/research purposes? Please answer YES or NO.

Yes

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

Data is collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to personal identifiable information will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573).

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 project does not include an IT system but will collect PII. A system of records notice will be published in the Federal Register. In addition, the teacher surveys will seek active consent and contain information such as assuring that participation is voluntary, responses are confidential, and no PII will be reported. Language such as the following will be included: Your responses are protected from disclosure per the policies and procedures required by the Education Sciences Reform Act of 2002, Title I, Part E, Section 183. Mathematica Policy Research will present the information collected as part of this study in an aggregate form, and will not associate responses with any of the individuals who participate. We will not provide information that identifies you, your students, your school, or your district to anyone outside the study team, except as required by law. Your responses will be used only for research purposes. Additionally, no one in your school or district will see your responses.

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

The notice is entitled “Impact Evaluation of Departmentalized Instruction in Elementary Schools (18-13-44). The notice can be found here: <https://www.federalregister.gov/documents/2018/06/18/2018-13052/privacy-act-of-1974-system-of-records>

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

Participation in the study is voluntary at the district, school, and teacher levels. Prior to the start of the study, districts, schools, and teachers will be informed of the requirements for participation. School principals, in consultation with their teachers, will have the opportunity to voluntarily participate in the study. Each participating district and school will have a memorandum of understanding (agreement form) that both they and the contractor sign prior to commencing with the study. This document outlines the conditions of study participation, and clarifies that participation is voluntary. For the teacher survey, teachers will need to give active consent before filling out the survey. They will be informed that their participation in the survey is voluntary and that they may choose not to fill out the survey or not answer any specific questions at any time. For the videos of classroom instruction, in districts that require active parental consent, teachers will distribute forms for students to take home for their parents to sign giving consent. In districts that allow passive parental consent, teachers will distribute alternate forms for students to take home and parents to sign only if they do not wish to give consent. All consent forms will indicate that participation is voluntary, with clear instructions about what to do if the parent wishes to opt-out.

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?

Findings from the study will be provided in a written report in aggregated form and available publicly. All information from the “Impact Evaluation of Departmentalized Instruction in Elementary Schools” that are reported or released will not contain any PII.

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?

Findings from the study will be provided in a written report in aggregated form and available publicly. The data from the evaluation with personally identifiable information will not be shared, either internally or externally. Data will be used to describe how schools in the study decide to structure departmentalized instruction, as well as the perceived challenges of transitioning to departmentalized instruction in grades 4 and 5. It will also be used to estimate the impact on student achievement and teacher practices of departmentalizing instruction in elementary grades (where each teacher specializes in teaching one subject to multiple classes of students) relative to the more traditional self-contained approach to instruction (where each teacher all subjects to a single class of students). Ultimately the findings from this evaluation will be used to inform effective teacher and school improvement strategies.

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.

Findings from the study will be provided in a written report in aggregated form and will be available publicly, including Congress and relevant Department of Education offices. As required by the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563), a restricted-use data file with study-created identifiers will be available to qualified researchers who are approved license-holders and are in compliance with NCES data security procedures. All of these products will be appropriately stripped of PII.

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?

The findings from this evaluation will be reported in written form to inform effective teacher and school improvement strategies. This purpose aligns with the stated purpose of question 1.2 above. The restricted-use data file will be for the purpose of allowing qualified and licensed researchers to replicate the study's findings and for secondary research purposes, in accordance with the dictates of the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. 9561(b) and 9563).

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

Findings from the study will be provided in a written report in aggregated form and available publicly on the IES website. The restricted use data file will be provided to qualified and licensed researchers on encrypted, password-protected CD. Approved license-holders must be in compliance with NCES data security procedures.

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**.

Yes

6. Redress⁴

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

Please refer to the SORN for information on record access procedures.

A system of records notice is published for individuals of the public to access at https://www2.ed.gov/notices/sorn/18-05-18_092305.pdf

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?

Please refer to the SORN.

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

Please refer to the SORN.

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?

Data is collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to PII, will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573). Only the contractor's employees who have a demonstrated need to access the protected data will be given access. In order to access such data, each relevant employee must receive a "moderate" 5c security clearance through the U.S. Department of Education and Office of Personnel Management. Receiving such clearance includes undergoing a background check, background interview, and credit check. Each contractor employee must receive approval from the Project Officer of the contract, who is a U.S. Department of Education employee, before beginning the clearance process. Each contractor employee must describe their specific proposed role on the contract (for example, someone who has statistical programming expertise and would be responsible for analyzing the data to produce findings), and why that requires access to the protected data (and therefore a moderate 5c security clearance). The Project Officer will review each request and ensure that the contractor employee's request is valid for the stated purpose. All protected data are stored on secure computers with encryption and password protection, so that contractor employees cannot gain access to protected data until the appropriate security clearance is granted.

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

Data is collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573). Security protocols for this system of records meet all required security standards. The contractor is required to ensure that information identifying individuals is in files physically separated from other research data and electronic files identifying individuals are separated from other electronic research data files. The contractor will maintain security of the complete set of all master data files and documentation. Access to individually identifiable data will be strictly controlled. All information will be kept in locked file cabinets during nonworking hours, and work on hardcopy data will take place in a single room, except for data entry. Physical security of electronic data also will be maintained. Security features that protect project data will include: password-protected accounts that authorize users to use the contractor's system and gives access only to specific network directories and network software; user rights and directory and file attributes that limit those who can use particular directories and files and determine how they can use them; and additional security features that the network administrators will establish for projects as needed.

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.

Yes

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.

Contractor employees who “maintain” (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573), including any monitoring, testing or evaluation conducted on a regular basis to ensure that the data are collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002.

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?

Data is collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to individually identifying data will be strictly controlled. The contractor’s employees who “maintain” (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573). Specific controls that contractors may implement include performance of annual self-assessments of security controls; annual Contingency Plan testing; performance of periodic vulnerability scans; updating all information system and security documentation as changes occur; and other continuous monitoring activities, which may include, mapping, penetration and other intrusive scanning. In addition, the contractor will ensure that any applicable IT product/system is monitored during all hours of operations using entrusted detective/preventive systems; has current antiviral products installed and operational; is scanned on a reoccurring basis; and has vulnerabilities remediated in a timely manner.

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

Data is collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to individually identifying data will be strictly controlled. The contractor's employees who "maintain" (collect, maintain, use, or disseminate) data in this project will comply with the requirements of the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573). If there is a suspected or known breach/disclosure of PII due to lost, theft, intercepted transfer, or other, the contractor will ensure that this breach is reported to the Department as soon as the contractor has knowledge of it. Follow-up reports of the final status of loss events will also be prepared by the contractor within a reasonable period of time as advised by the Department. The risks of disclosure are also mitigated by ensuring that there are proper procedures and controls on how the data are collected, handled, stored, and retained. These procedures were described in the prior sections and comply with all applicable laws and regulations.