

U.S. Presidential Scholars Privacy Policy and Impact Assessment

PRIVACY POLICY AND PRIVACY IMPACT ASSESSMENT FOR OLAS FOR PSP

Thank you for visiting The U.S. Presidential Scholars Program's On-Line Application System (OLAS) section and reviewing our privacy policy. Our policy is simple: We collect no personal information about you unless you choose to provide that information to us.

Neither the Department of Education nor its contractors give, share, sell, or transfer any personal information to a third party. If you want to know more about how we record nonpersonal information about your visit or how we use information that you voluntarily submit, read on.

Otherwise, enjoy your visit!

INTRODUCTION

What is OLAS?

The multiple program On-Line Application System (OLAS) allows eligible candidates, who have received an invitation to apply to the U.S. Presidential Scholars Program. Eligible candidates are allowed to complete and submit their applications electronically. OLAS, which is limited to users who have been authorized and issued user ID's and passwords by ED, is reached through the U.S. Presidential Scholars Program's main site, <http://www.ed.gov/psp>. 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: the Executive Orders that authorize our work; frequently asked questions; the Commission members appointed by the President to select the Scholars each year; and the organizations that partner with us, without providing any personal information at all. 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.

What is the purpose for which the personally identifiable information (PII)¹ is collected, used, maintained, or shared?

This information is requested in order to carry out the authorizing Executive Order 11155 (1964) and its amendments, Executive Orders 12158 (1979) and 13697 (2015), by: determining the eligibility of candidates and reviewing their applications in order to select program semifinalists and finalists on an annual basis; developing and implementing the program's annual recognition component; and

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>

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 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.

Is this a new system, or one that is currently operating?

This is a new system that will replace PSAonline for the U.S. Presidential Scholars Program and also be utilized by OCO's School Ambassador Fellows Program.

Is this PIA new, or is it updating a previous version?

This PIA updates the version used for PSAonline. The School Ambassador Fellows Program will have its own PIA.

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.

LEGAL AUTHORITIES AND OTHER REQUIREMENTS

What specific legal authorities and/or agreements permit and regulate the collection and use of data by the system?

This information is requested in order to carry out the authorizing Executive Order 11155 (1964) and its amendments, Executive Orders 12158 (1979) and 13697 (2015). 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

Is this system covered by a Privacy Act System of Records Notice(s) (SORN(s))²?

A 'system of records' has been created under the Privacy Act, 5 U.S.C. 552a. The System of Records Notice was published in the Federal Register December 3, 2003 (68 FR 67781-85).

NARA

Does a records retention schedule approved by National Archives and Records Administration (NARA) exist for the records contained in this system?

The Records Schedule Number is 102. *OLAS* data is considered temporary. Data that has been collected is cut off annually upon close of program awards cycle and destroyed/deleted 4 years after cutoff.

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

Yes.

CHARACTERIZATION AND USE OF INFORMATION

Collection

What personally identifiable information (PII) does the system collect, use, disseminate, or maintain?

The online forms collect the same information as the program's existing paper application, and asks candidates to provide: their first name, middle initial, and last name; permanent address; State of legal residence, telephone number at permanent address; mailing address and telephone number if different from permanent address; personal information including gender, age, and date of birth; e-mail address; high school name and address; name, school subject area and address of the teacher being nominated by the applicant as a Distinguished Teacher; first-choice college; information about extracurricular activities, work experience, community activities, special talents and awards; standardized test scores; school transcripts; and responses to short answer questions and one essay topic. The application content was developed by the Commission on Presidential Scholars.

We will not use this information except as may be consistent with purposes identified in the website's System of Records Notice published on December 3, 2003 (68 FR 67781-85), found at: http://www.access.gpo.gov/su_docs/fedreg/a031203c.html. Logging in to *OLAS* and saving information in the system indicates that you understand that the information you are providing may be disclosed by the Department as provided by the Privacy Act and the routine uses in the published System of Records Notice.

Is this information collected the minimum necessary to achieve the purpose stated in the introduction?

Yes.

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>

What are the sources of information collected (e.g., individual, school, another agency, etc.) and how is the information collected from stated sources (paper form, webpage, database, etc.)?

The sources of information include the following:

- Individual students via paper and submission
- Schools via paper and electronic submission
- Chief State School Officers via electronic submission
- Partner organizations via electronic submission
- Testing agencies (e.g. ACT, Inc., The College Board)

How is accuracy of the data ensured?

Data submitted by the Chief State School Officers, partner organizations and testing agencies is reviewed and either confirmed or corrected by the individual students completing their applications. Data submitted by school recommender is reviewed and confirmed by the school principal. In addition, 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.

Use

How and why does the system use the information to achieve the purpose stated in the first question in this section?

This information is requested in order to carry out the authorizing Executive Order 11155 (1964) and its amendments, Executive Orders 12158 (1979) and 13697 (2015), by:

- determining the eligibility of candidates and reviewing their applications in order to select program semifinalists and finalists on an annual basis;
- developing and implementing the program's annual recognition component; 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 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.

Does the system use commercial information, publically available information, or information from other Federal agency databases?

The system does not use commercial information, publically available information, or information from other Federal agency databases. The sources of information are described in Question 3.3.

Social Security Numbers

Does the system collect Social Security Numbers?

No.

NOTICE

How does the system provide individuals notice about the collection of PII prior to the collection of information?

Candidates are invited to apply to the U.S. Presidential Scholars Program 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 award. Users are notified that registration and submission of some PII is necessary because applications cannot be submitted anonymously.

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.

Where is the text of the notices posted?

www2.ed.gov/programs/psp/applications/privacy.doc

INFORMATION SHARING

Internal

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

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

- Disclosures to the Review Committee and the Commission on Presidential Scholars;
- Disclosures to the general public announcing the program's candidates, semifinalists and finalists;
- Disclosures to the general public of the annual U.S. Presidential Scholars Yearbook;
- Disclosures to contractors for production of program recognition materials and the U.S. Presidential Scholars Yearbook;
- Disclosures to contractors and college-age interns to arrange Scholar accommodations, transportation, and other services;
- Disclosures to national, State and local media to publicize the Scholars and respond to press inquiries about them;

- Disclosures to the White House and Federal agencies for briefings, speechwriting, or to obtain security clearances;
- Disclosures to national, State and locally-elected officials and their staff to notify them of candidates, semifinalists and Scholars in their States or districts, and to assist with other activities to recognize these individuals; and
- Disclosures to State and local education officials to notify them of candidates, semifinalists and Scholars in their States, districts, or schools.

What information will be shared and with whom?

Winners' city, state, school, and contact information will be shared with the entities in the previous answer.

What is the purpose for sharing the specified information with the specified internal organizations? Does this purpose align with the stated purpose of the system as state above?

The information is used by the Department and its Contractors to perform the following functions:

- Verify eligible candidates;
- Provide technical assistance and respond to e-mail requests from system users;
- Conduct the annual selection of Scholars;
- Announce the program's candidates, semifinalists and finalists to the general public;
- Produce program recognition materials, including medallions and the annual U.S. Presidential Scholars Yearbook;
- Host in-State recognition ceremonies for semifinalists and finalists;
- Arrange the national recognition events, including Scholar accommodations, transportation, and other services;
- Inform national, State and local media so that they may publicize Scholars and the program;
- Provide information to the White House and Federal agencies for briefings, speechwriting, or to obtain security clearances for recognition events;
- Notify national, State and locally-elected officials of candidates, semifinalists and Scholars in their States or districts and assist with the recognition of these individuals; and,
- Notify State and local education officials to notify them of candidates, semifinalists and Scholars in their States, districts or schools.

External

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.

Disclosure also may be made for one of the above purposes to another agency under a computer matching agreement that meets the standards under the Privacy Act.

There will be no sharing of information for purposes outside of the above disclosure requirements or for anything other than the primary purpose(s) of collecting the information. Any contractor responsible for the operations of this website, including contractors, must comply with the requirements of the Privacy Act in the handling of information collected through the website.

Information about the winners will be disclosed to each winner's elected officials in the Senate and House, state governor, state school superintendent, school officials, and nominating organization, if applicable. Winners will also be given the option of sharing their information with the Presidential Scholars Association (Alumni).

What information will be shared and with whom?

Winners' city, state, school, and contact information will be shared with the entities in the previous answer.

What is the purpose for sharing the specified information with the specified external entity? Does this purpose align with the stated purpose in the question in this document?

The specified information will be shared with the entities mentioned above so that the winners' may be congratulated and recognized by these entities for their achievement.

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

This information is mailed or securely emailed by the Department.

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

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

Does the project place limitations on re-disclosure?

No.

REDRESS

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.

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 the U.S. Presidential Scholars Program to correct the information.

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 the U.S. Presidential Scholars Program to correct information that can only be edited by an administrator.

SAFEGUARDS

Does the principal office work in accordance with OCIO to build privacy & security into the system and build privacy extensions to the extent feasible?

Yes.

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.

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.

Has an Authority to Operate (ATO) been granted?

Yes.

Does the IT system have logging capabilities that can provide an account for all disclosures and make this account available to individuals in the record?

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.

AUDITING AND ACCOUNTABILITY

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.

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.