Privacy Impact Assessment (PIA)
for the

DC Choice Program Evaluation

Dec 27, 2018

This PIA was originally approved on 04/23/2004 and reviewed on 8/1/2018 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: Meredith Bachman

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 system (DC Choice Program Evaluation) was created to carry out a congressionally mandated evaluation of the DC Choice program. Congress mandated that the evaluation compare outcomes of students that applied for and were awarded private school vouchers to students that applied for but were not awarded private school vouchers. The system allows for collecting information on the type of school students attend (public or private), students' backgrounds, their academic achievement, and their perceptions of their schools. The system also gathers information about parents' backgrounds and their perceptions of their children's schools. In order to track families over time, which is necessary to examine how the program impacts achievement and other outcomes, the system must also collect contact information such as parent phone numbers.

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

The 2011 Scholarships and Opportunities for Results (SOAR) Act reauthorized the 2004 DC School Choice Incentive Act and included a mandate for IES to conduct an evaluation of the program (Section 3009(a)).

The program is intended to provide low-income parents residing in the District of Columbia with expanded opportunities for enrolling their children in private schools. The information in this system allows IES to fulfill the requirements of the SOAR Act. In particular, section 3009(a) directs IES to evaluate the program "using the strongest possible research design" for determining impacts on achievement and other outcomes. The 2017 SOAR Reauthorization Act further requires IES to track students in the evaluation and examine college related outcomes.

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1 The term "personally identifiable information" refers to assformation 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.

Updated PIA   Original Publication Date: 4/23/2004

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?

H.R. 1473 (P.L. 112-10), the Department of Defense and Full-Year Continuing Appropriations Act, 2011. Division C of P.L. 112-10 reauthorized the DC School Choice Incentive Act enacted in 2004 through the Scholarships and Opportunities for Results (SOAR) Act.

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 system is covered under the system of records notice entitled DC Choice Program Evaluation, dated April 23, 2004, (69 FR 22014-22016).

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.

IES is currently working with the Records Management Division to draft an appropriate records retention schedule for the data collected. Until a retention schedule is approved, all records will be held indefinitely.

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[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.

Student: name; birth date; home address; demographic characteristics (race/ethnicity, grade in school); school attended; achievement and attendance; responses to survey items asking about satisfaction with school and perceptions of school safety

Parent: name; home address; email address; phone number; demographic characteristics (race/ethnicity, level of education; employment); responses to survey items asking about satisfaction with child's school, perceptions of school safety, and involvement with child's education at school and at home

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.)?

• Student surveys (paper form)
• Parent surveys (webpage or paper form)
• DC's Office of the State Superintendent of Education's administrative records (database)
• DC Choice/Opportunity Scholarship Program operator records (database)

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

Paper, web form and database.

3.5 How is this information validated or confirmed?[3]

For paper forms, the contractor has procedures in place to assure that data are entered correctly (e.g., double entry and spot checking) and to clean data (e.g., frequencies are run to make sure values are in the expected range). Web based data collection additionally has built in validation (e.g., values outside of the expected range cannot be entered).

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[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 SOAR Act statute requires that the evaluation examine the impact of being offered a private school voucher on (1) student achievement, (2) student satisfaction with school and perceptions of school safety, and (3) parent satisfaction with children's schools, perceptions of school safety, and involvement with their children's education.
>
> Collecting names and birth dates are necessary for locating students in their schools so that testing and surveys can be completed. Parent contact information is needed so that parents can be surveyed.

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?

> Individual access to the offices of the Department, contractor, Westat, that maintains the system of records is controlled and monitored by security personnel. The contractor has established a set of procedures to ensure confidentiality of data, that only individuals with proper security clearance have access to the data and that the Department is aware of the individuals that will have access to the data. The system ensures that information identifying individuals is in files physically separated from other research data. Westat maintains security of the complete set of all master data files and documentation. Access to PII data is strictly controlled. All data is kept in locked file cabinets during nonworking hours, and work on hardcopy data will take place in a single room, except for data entry.

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.

All families interested in applying for scholarships were made aware of the evaluation and associated data collection (in writing and through oral explanation). Evaluation participants signed written agreements for data collection.

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

Participants must sign the following agreement before data are collected:

In submitting this application, I agree to the following for each child named below:
• To be eligible for participation in the D.C. Opportunity Scholarship Program, I must live in the District of Columbia and my annual household income must be below certain specified amounts. I certify that I am now a resident of the District of Columbia and will be for the [insert appropriate years] school year.
• I understand that, if eligible, my child's name will be placed in a lottery for a scholarship. I also understand my child(ren) may or may not receive a scholarship under this Program.
• I understand that the Trust must keep copies of all documents submitted during the application process to ensure that families are eligible. The Trust will keep this data strictly confidential.
• I understand that the Trust will have access to my child's report cards while my child is participating in this program. This information will be held strictly confidential and will not be shared with anyone but designated Trust staff.
• I understand that my child and I are required to participate in all aspects of the evaluation, including the annual testing of my child, filling out annual surveys, and allowing records to be collected from my child's school. If my child and I do not participate in these evaluation my child will not be eligible for a scholarship in any year.

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

There is no opportunity to apply for a private school voucher and also decline information for the evaluation because it is a condition of participation. Individuals may opt out at any time.

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.

No

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

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?

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.

No

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.

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?

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

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**.

6. Redress[4]

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

Please refer to the SORN. Information can be found here:
https://www2.ed.gov/notices/sorn/18-13-07_042304.pdf

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[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. Information can be found here:
https://www2.ed.gov/notices/sorn/18-13-07_042304.pdf

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

Please refer to the SORN. Information can be found here:
https://www2.ed.gov/notices/sorn/18-13-07_042304.pdf

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?

The contractor has established a set of procedures to ensure confidentiality of data, that only individuals with proper security clearance have access to the data. and that the Department is aware of the individuals that will have access to the data.

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

Physical security of electronic data will also be maintained. Security features that protect project data include password-protected accounts that authorize users to use the Westat system but to access only 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; e-mail passwords that authorize the user to access mail services and additional security features that the network administrator establishes 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.

The contractor provides regular updates regarding access to data, data management, and date security procedures. This includes personnel updates, updates on use of passwords, and use of data more generally.

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?

The system owner is in frequent contact with the contractor. An updated list is kept that identifies individuals on the contractor's staff with access to the data and the contractor must clear with the system owner any addition of data elements or use of data for analysis.

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

The primary risk is that students and families participating in the program may be identified. To assure this does not happen, the system ensures that information identifying individuals is in files physically separated from other research data. Also, access to PII is strictly controlled, all data is 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 will also be maintained. Security features that protect project data include password-protected accounts that authorize users to use the Westat system but 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; e-mail passwords that authorize the user to access mail services and additional security features that the network administrator establishes for projects as needed.