Privacy Impact Assessment (PIA)

the

On-Line Application System (OLAS)
for School Ambassador Fellows Program (SAF)
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*Please complete this **Privacy Impact Analysis (PIA)** of how information in identifiable form is collected, stored, protected, shared, and managed electronically by your system. You may wish to consult with your ISSO in completing the following document. If a question does not apply to your system please answer with N/A.*

Should any questions arise, please do not hesitate to contact the Privacy Safeguards team at privacysafeguards@ed.gov

1. Introduction

1.1. Describe the system including the system name, system acronym, and a brief description of the major functions.

The multiple program On-Line Application System (OLAS) allows individuals to apply to the School Ambassador Fellows (SAF) Program. Eligible candidates are allowed to complete and submit their applications electronically. OLAS for SAF is reached through the SAF's main site, www.ed.gov/programs/schoolfellowship. 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 mission of the program, eligibility criteria, application process information, and frequently asked questions, 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. A system of access levels is implemented. Privileges are assigned on a need to know basis.

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

The Intergovernmental Personnel Act (IPA) mobility program regulations (5 CFR part 334), revised effective May 29, 1997, allow federal agencies to facilitate cooperation

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[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

between the Federal Government and the non-Federal entity through the temporary assignment of skilled personnel. In order to identify the most skilled personnel for the position of Ambassador Fellow for the sound public purpose of gaining practicing teachers' and principals' unique approaches to solving educational problems and assisting in developing and identifying support for effectively implementing Federal policies and programs. In turn, the experience provides Fellows and their sending schools and districts with developmental experience, which will enhance the assignee's performance in his or her regular job.

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.

1.3. 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.

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

This PIA updates the version used for the Teacher and Principal Ambassador Fellows Programs (note: the program name has been changed to School Ambassador Fellows (SAF) Program).

1.5. 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.

2. Legal Authorities and Other Requirements
2.1. What specific legal authorities and/or agreements permit and regulate the collection and use of data by the system?

The Intergovernmental Personnel Act (IPA) mobility program regulations (5 CFR part 334), revised effective May 29, 1997, allow federal agencies to facilitate cooperation

between the Federal Government and the non-Federal entity through the temporary assignment of skilled personnel. In order to identify the most skilled personnel for the position of Ambassador Fellow for the sound public purpose of gaining practicing teachers' and principals' unique approaches to solving educational problems and assisting in developing and identifying support for effectively implementing Federal policies and programs. In turn, the experience provides Fellows and their sending schools and districts with developmental experience, which will enhance the assignee's performance in his or her regular job.

SORN

2.2. Is this system covered by a Privacy Act System of Records Notice(s) (SORN(s))[2]? If no, explain why not. If yes, provide the SORN name and number, or indicate that a SORN is in progress.

This system is covered by the Government-wide SORN OPM/GOVT-5 - Recruiting, Examining, and Placement Records.

Records Management

2.3. Does a records retention schedule approved by National Archives and Records Administration (NARA) exist for the records contained in this system? If yes, please provide the NARA schedule number.

This information falls under GRS 1, Item 32. Merit Promotion Case Files. Records relating to the promotion of an individual that document qualification standards, evaluation methods, selection procedures, and evaluations of candidates. Destroy after OPM audit or 2 years after the personnel action is completed, whichever is sooner. (N1-GRS-79-2 item 1).

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

Yes.

3. Characterization and Use of Information

Collection

3.1. Identify all the personally identifiable information (PII) that the system collects, uses, disseminates, or maintains.

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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

The only elements of personally identifiable information (PII) would include the applicant's name, email and phone contact information, and place of employment. This information will be included in their resumes which are a required application component, as well as referenced through a required letter of recommendation from their employer for the position. No Sensitive PII (SPII) will be stored.

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

Yes.

3.3. 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 applicants via electronic submission
- Applicant's employer via electronic submission

3.4. How is accuracy of the data ensured?

Data is submitted by the individuals completing the applications and the employer they choose to recommend them. 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 includes 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

3.5. Describe how and why the system uses the information to achieve the purpose stated in Question 1 above.

The system collects information entered by the applicant and the employer selected by the applicant to allow for the applicant to be evaluated for the opportunity of participating in the School Ambassador Fellows (SAF) Program for one year. The work of the U.S. Department of Education has significant impact on teachers and school leaders. One portion of the Department's mission is to collect and share data on education and to focus national attention on key educational issues.

Our School Ambassador Fellows add a critical school-level perspective and help the Department to more effectively share information about education policy and public resources with the field. The identification of the school leaders who are poised to play these roles for ED requires a rigorous and open selection process that enables practitioners to express their interest in the position and to demonstrate their ability to meet the programs' eligibility and performance criteria. The first step of this process requires demonstrating that one is a current school leader and by identifying one's workplace and providing a letter or recommendation from that employer. We must then be able to be in contact with all applicants to notify them if they have been selected to move on to additional stages of selection or not, which requires the submission of email and/or phone contact information.

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.

3.6. Explain if the system uses 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

3.7. Does the system collect Social Security Numbers? If so, explain the purpose of its collection, type of use, and any disclosures. *Please note if the system collects SSN, the PIA will require a signature by the Assistant Secretary or equivalent.*

N/A

3.8. Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

N/A

4. Notice

4.1. How does the system provide individuals notice about the collection of PII prior to the collection of information? If notice is not provided, explain why not.

School leaders have the opportunity to apply to the SAF 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 fellowship. Users are notified that registration and submission of some PII is necessary because applications cannot be submitted anonymously. The Privacy Notice will be posted on our program websites under the application process. We will indicate in the application package and on the website, that submission of one's application indicates the applicant's consent to use their resume containing contact information and place of employment in the process of assessing their ability to meet program eligibility requirements and that their contact information will not be shared with any other entities.

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

If invited individuals 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.

4.3. Provide the text of the notice, or the link to the webpage where notice is posted.

The OLAS privacy policy is available at the following link:
www.ed.gov/programs/schoolfellowship

5. Information Sharing
Internal

5.1. Will information be shared internally with other ED organizations, if so, which ones?
SAF applications will be shared with ED Staff who serve as reviewers as part of the selection processes. These are staff members at ED across the organization who have either served as teachers or principals prior to coming to ED or who work on issues directly related to teacher and principals. Review teams are always comprised of three people and we seek balance between ED staff members, current Fellows (who are also ED Staff members) or former Fellows who no longer are employed by ED. Applications will be maintained in secured, password protected electronic folders, and reviewers will only have access to the subset of applicants for which they are responsible.

5.2. What information will be shared and with whom?

Fellows' contact information will be shared with the entities in the previous answer.

5.3. 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, above?

The information is used by the Department 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 Fellows;
- Announce the program's finalists to the general public;
- Produce program recognition materials;
- Inform national, State and local media so that they may publicize Fellows and the program;
- Notify State and local education officials of Fellows in their States, districts or schools.

External

5.4. Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)?

The only external sharing of applications would be with former Fellows who no longer serve in official capacity with ED. As they will not have access to the secured electronic files, Alums will be provided with encrypted versions of the select files. 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 state school superintendent and school officials.

5.5. What information will be shared and with whom?

Fellows' contact information will be shared with the entities in the previous answer.

5.6. What is the purpose for sharing the specified information with the specified external entity? Does this purpose align with the stated purpose in Question 1 above?

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

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

This information is mailed or securely emailed by the Department.

5.8. 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

5.9. 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

5.10. Does the project place limitations on re-disclosure?

No.

6. Redress

6.1. 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.

6.2. 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 SAF Program to correct the information.

6.3. 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 SAF Program to correct information that can only be edited by an administrator.

7. Safeguards

7.1. 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.

7.2. 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.

7.3. 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.

7.4. Has an Authority to Operate (ATO) been granted?

Yes.

7.5. 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.

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?

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.

8.2. 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.