Privacy Impact Assessment (PIA)
for the

Connecting Adults to Success: Evaluation of Career Navigator Training
October 26, 2023

Point of Contact
Contact Person: Melanie Ali
Title: Education Research Analyst
Email: Melanie.Ali@ed.gov

System Owner

Name: Melanie Ali
Title: Education Research Analyst
Principal Office: Institute of Education Sciences (IES)

**Submit completed Privacy Impact Assessments to the Privacy Office at
privacysafeguards@ed.gov**

*Please complete this **Privacy Impact Assessment (PIA)**, which describes 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, answer with N/A.

- **Please ensure all responses are written in plain language. Write out all acronyms on first use and use acronyms consistently thereafter.**

- **For questions that are identical to those in the Privacy Threshold Analysis (PTA), please review the responses provided in the most recently approved PTA, determine whether the responses remain accurate, and, if so, use the same response in the PIA.**

1. Introduction

1.1. Describe the project or program that uses this information technology (IT) system, including the purpose of the project or program.

The Connecting Adults to Success: Evaluation of Career Navigator Training (CATS Study) is a U.S. Department of Education (Department) study that will examine the implementation of a model of training for career navigators at adult education sites and the impact of the training on learners' education and employment outcomes. This study is being conducted by Mathematica Policy Research, under contract to the Department. The information in this system will be used to assess whether providing career navigators with training leads to improved education and employment outcomes among adult learners. The study will examine whether outcomes measured at 18 and 30 months of beginning participation in the study differ on average between learners in sites that are assigned by lottery to receive the study's career navigator training and learners in study sites that are assigned by lottery to a control group.

The system consists of a set of linked files that include study data. These data will include descriptive information regarding the adult education sites participating in the study, as well as individual-level data pertaining to the adult learners and career navigators participating in the study.

Staff at Mathemtica Policy Research will be responsible for the collection of the following study data and will upload files containing these data through secure transfer to the IES Data Center (IESDC).

- Descriptive information on site characteristics and practices. Mathematica Policy Research will obtain this information through interviews with site directors.
- Information on career navigators, the services they provide, and their experiences with the study's training. This information will be collected through online

surveys of the career navigators. Surveys will be administered by Mathematica Policy Research through its ConfirmIT application. ConfirmIT is a survey software platform through which single- or multi-mode, 508-compliant surveys can be built and launched. ConfirmIT web surveys are hosted on secure HTTP with a security certificate from a recognized vendor. The surveys also have standard password authentications and be transmitted through 256-bit encryption.

- Information on learners. This information will be collected online by Mathematica Policy Research through data entered by learners and program intake staff at study sites into RAPTER, a cloud-based case management system that uses encryption of data in transit and at rest, restrictive firewalls, and multi-factor authentication. Continuous monitoring and logging measures are used to ensure data availability and integrity. Learner information will also be obtained through matching with the records of the adult education site at which the learner is enrolled, the National Student Clearinghouse, the National Directory of New Hires, the Central Processing System and National Student Loan Data System of the Office of Federal Student Aid (FSA), and the databases of high school equivalency test vendors.

In order to match with the administrative databases of FSA and the U.S. Department of Health and Human Services (*i.e.*, the National Directory of New Hires), staff from Mathematica Policy Research will upload a file with learner identifiers (names, dates of birth, Social Security numbers(SSN)) through secure transfer to the IESDC. With this file, IES staff will receive files containing the matched data from FSA and the U.S. Department of Health and Human Services through secure transfer from the IESDC.

Study staff from Mathematica Policy Research will have access to all study data on the IESDC, where all data analysis will take place. Data will be accessed by contract staff to conduct statistical analyses to describe the background characteristics of the career navigators and adult learners at study sites, describe the implementation of the study's training, examine the services provided by the navigators, and estimate the impact of the training on learners' basic skills, high school equivalency credential attainment, college enrollment, employment, and earnings.

Mathematica Policy Research will provide IES with two reports on study findings. These reports, which will not contain individual-level information, will be made publicly available by IES.

Two sets of data files will be stored long-term on the IESDC:

1. A set of restricted-use data files. These files will contain study-created identifiers

and will be made available to researchers who are approved license holders and are in compliance with the National Center for Education Statistics' data security procedures. The data file will exclude direct identifiers, including participant name, date of birth, and SSN, but will include other individual-level data collected for the study.

2. A set of data files that contain all data in the restricted use data set, plus names, dates of birth, and SSNs for learners in the study. IES may use these data in order to follow learners over time and examine any long-term impacts of the career navigator training.

1.2. How does the IT system function to support the project or program as described in Question 1.1?

The system consists of a set of linked files that include study data. These data will include descriptive information regarding the adult education sites participating in the study, as well as individual-level data pertaining to the adult learners and career navigators participating in the study.

Information on site directors will be obtained directly through interviews with these directors.

Information on career navigators, the services they provide, and their experiences with the study's training will be collected through online surveys of the career navigators. Information on learners will be collected online through data entered by learners and program intake staff at study sites as well as through matching with the records of the adult education site at which the learner is enrolled, the National Student Clearinghouse, the National Directory of New Hires, the Central Processing System and National Student Loan Data System of FSA, and the databases of high school equivalency test vendors.

This study will leverage two IT systems that the contractor uses: RAPTER and ConfirmIT.

1. RAPTER is a management information system and will contain study data entered by staff and learners at study sites. RAPTER is a cloud-based case management system that uses encryption of data in transit and at rest, restrictive firewalls, and multi-factor authentication. These security measures and role-based access control protect against unauthorized viewing of and access to data, and unauthorized alteration, disclosure, or destruction of data. Continuous

monitoring and logging measures are used to ensure data availability and integrity.

2. Surveys will be administered by the contractor through its ConfirmIT application. ConfirmIT is a survey software platform through which single- or multi-mode, 508-compliant surveys can be built and launched. Surveys authored in one mode in ConfirmIT can be deployed across other modes – including web, Computer-assisted personal interviewing[1] (CAPI), telephone, mobile, and paper. ConfirmIT web surveys are hosted on secure HTTP with a security certificate from a recognized vendor. The surveys also have standard password authentications and be transmitted through 256-bit encryption.

Data will be accessed by contract staff to conduct statistical analyses to describe the background characteristics of the career navigators and adult learners at study sites, describe the implementation of the study's training, examine the services provided by the navigators, and estimate the impact of the training on learners' basic skills, high school equivalency credential attainment, college enrollment, employment, and earnings. Only contracting staff at Mathematica Policy Research will have direct access to data through RAPTER and ConfirmIT. Data access on Mathematica's network is granted on a need-to-know basis. Only employees with Mathematica network IDs and passwords have access to the data. This access is enforced through access control lists linked to the user's login information. Access to the information system is revoked immediately when a staff member leaves Mathematica.

Contractor staff at Mathematica Policy Research will upload study data collected through RAPTER and ConfirmIT through secure transfer to the IESDC, where all data analysis will take place.

1.3. What are the technical elements and/or components of the IT system? Mark all that apply.

☐ Website	☐ Portal	☒ Application
☒ Database	☐ Server	☐ Other (Specify Below)

If you have been directed to "specify below," describe the type of technical elements and/or component:

---

[1] Computer-assisted personal interviewing (CAPI) is an interviewing technique in which the respondent or interviewer uses an electronic device to answer the questions.

1.4. Describe the purpose for which the personally identifiable information (PII)[2] is created, collected, used, processed, stored, maintained, disseminated, or disclosed by the IT system. If there is more than one type of individual from whom PII is collected (e.g., grantees, parents, Federal employees, contractors), specify the purpose for each type of individual.

In order to successfully carry out this study, PII is needed to assess the implementation of the career navigator training and to rigorously estimate the impacts of the training on adult learner outcomes, as well as to describe the background characteristics of study participants (including career navigators and adult learners) and to create subgroups for analysis based on these characteristics. This information can only be obtained by collecting survey data from individuals and administrative data from adult education sites, high school equivalency test vendors, the National Student Clearinghouse, the National Directory of New Hires, and FSA.

Ultimately, the findings from this evaluation will be used to describe the implementation of the career navigator training and examine whether the training is a viable strategy to improve adult learner education and workforce outcomes. Data from the evaluation that includes PII will not be publicly released.

1.5. Is the IT system operated by the agency or by a contractor?

Contractor

1.6. If the IT system is operated by a contractor, describe the contractor's role in operating the system.

☐ N/A

Study staff from Mathematica Policy Research will have access to all study data on the IESDC, where all data analysis will take place. Data will be accessed by contract staff to conduct statistical analyses to describe the background characteristics of the career navigators and adult learners at study sites, describe the implementation of the study's training, examine the services provided by the navigators, and estimate the impact of the training on learners' basic skills, high school equivalency credential attainment, college enrollment, employment, and earnings.

---

[2] 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. OMB Circular A-130, page 33

Mathematica Policy Research will provide IES with two reports on study findings. These reports, which will not contain individual-level information, will be made publicly available by IES.

1.7. If the IT system is operated by a contractor, does the contract and other acquisition-related documents include privacy requirements?

Yes

☐ N/A

2. Legal Authorities and Other Requirements
If you are unsure of your legal authority, contact your program attorney.

2.1. What specific legal authorities permit and regulate the collection and use of data by the IT system? Include name and citation of each authority.

This study is authorized under Section 242 of Title II of the Workforce Innovation and Opportunity Act of 2014. It is also authorized under Section 173 of the Education Sciences Reform Act of 2002.

System of Records Notice (SORN)

2.2. Has the Department's Privacy Program determined that the PII maintained by the IT system is or will be maintained as part of a Privacy Act system of records? Refer to the "SORN" item in the "Privacy Program Determination" section of the PTA if unsure.
☒ Yes
☐ No

2.3. If yes, provide the full name(s), number(s), and Federal Register citation of the applicable SORN(s) and/or a statement indicating that a new or modified SORN is being prepared.

The SORN, titled "Connecting Adults to Success: Evaluation of Career Navigator Training" 18-13-46, 88 FR 72446, was published in the Federal Register on October 20, 2023.

Records Management

If you do not know your records schedule, consult with your records liaison, or send an email to RMHelp@ed.gov

2.4. Is there an applicable records retention schedule(s) for the information maintained in the IT system? Note: If no records schedule is in place or you are unsure of the applicable records schedule, reach out to your records liaison or the Records Management Office.

☐ Yes, there is/are approved records retention schedule(s) for the information. List the schedule(s):

☒ No, there are currently no approved records retention schedules, but there is a proposed schedule or plan to establish a schedule. Explain:

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

☐ Yes
☒ No

IES is 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.

3. **Information Collection, Maintenance, Use, and/or Disclosure**

Collection

3.1. Select the types of PII that are collected, maintained, used, and/or disclosed by the IT system. **Note:** PII includes any information that is linked or linkable to an individual, including business or contact information, information that is publicly accessible elsewhere, and ordinarily non-sensitive information.

Biographical and Contact Information

☒ Name	☒ Date of Birth	☒ Gender or Sex
☐ City, State, or County of Birth	☐ Country of Birth	☒ Home Address
☐ Personal Phone Number	☐ Work Phone Number	☐ Personal Email Address

☒ Work Email Address	☐ Work Address	☐ Personal Fax Number
☐ Work Fax Number	☐ Digital Signature ☐ Hand Signature	☐ Mother's Maiden Name

Other Demographic Information

☒ Citizenship and/or Alien Registration Number (A-Number)	☐ Military Service	☒ Marital Status, Spouse, and/or Child Information (Specify below)
☒ Educational Background/Records	☐ Group/ Organization Membership	☒ Employment Information
☐ Physical Characteristics or Biometrics (Height, Weight, etc.)	☒ Race/Ethnicity	☐ Religion

Identification Numbers

☒ Social Security Number	☐ Truncated/Partial Social Security Number	☐ Driver's License Number
☐ Passport Number	☐ Employee Identification Number	☐ Professional License Number
☐ Credit/Debit Card Number	☐ Bank/Financial Account Number	☐ Personal Device Identifiers/Serial Numbers
☐ License Plate Number	☐ File/Case ID Number	☐ Federal Student Aid Number
☐ Student ID Number	☐ Student Loan Number	☐ Grant Number
☐ Other ID That Can Be Traced to Individual (Specify below)		

Electronic and Miscellaneous Information

☒ Username/User ID	☒ Password	☐ IP Address
☐ MAC Address	☐ Complaint Information (Specify below)	☐ Medical Information (Specify below)
☐ Location Data	☐ Log Data That Can Be Traced to Individual	☐ Photographs of Individuals
☐ Videos of Individuals	☐ Criminal history	☒ Other (Specify below)

If you have been directed to "specify below," describe the PII: The career navigator's salary and benefits at the adult education site.

3.2. Select the category of individuals from whom information is collected, maintained, used, or disclosed by the IT system and, if applicable, list what information from Question 3.1 is collected from each. Check all that apply:

☐ Federal Employees

Specify types of information collected from Federal employees:

☒ Federal Contractors

Specify types of information collected from Federal contractors:

Contracting staff at Mathematica Policy Research require login credentials (username and password) to access study data collected through its systems.

☒ General Public (Any individual not employed by the Department).

Specify categories of the general public (e.g., teachers, students, parents, institution representatives, grantees, State and local

government employees), and the types of information collected from each:[3]

Information from site directors will include the names and email addresses of program intake staff and career navigators at the site. This information will be used to create and send usernames and passwords for RAPTER to these staff and to send unique survey links through ConfirmIT.

Information from career navigators will include work and training experience, educational background, race, age, ethnicity, gender, types of career navigation services the navigator provides, the navigator's salary and benefits at the adult education site, perceptions of the study's training, and records of the navigator's participation in the study's training and provision of navigation services to learners.

3.3. What are the sources of PII collected, maintained, used, or disclosed by the IT system (e.g., individual, school, another agency, commercial sources)?

For administrative access, PII will be collected from contracting staff at Mathematica Policy Research to access study data collected through its systems.

For the study, PII will be obtained from surveys of adult learners and career navigators, and from administrative records including those the National Student Clearinghouse, the National Directory of New Hires, FSA, high school equivalency test vendors, and local adult education provider study sites.

3.4. How is the PII collected from the stated sources listed in Question 3.3 (e.g., paper form, webpage, database)?

PII will be collected through online surveys and computer-based matching with administrative databases.

Information on career navigators, the services they provide, and their experiences with the study's training will be collected through online surveys of the career navigators. Information on adult learners will be collected online through data entered by the adult learners and program intake staff at study sites as well as through matching with the records of the adult education site at which the adult learner is enrolled, the National Student Clearinghouse, the National Directory of New Hires, the Central Processing

---

[3] For example:
From students: name, email address, phone number.
From institution representatives: name, email address, username, password.

System and National Student Loan Data System of FSA, and the databases of high school equivalency test vendors.

This study will leverage two IT systems that the contractor uses: RAPTER and ConfirmIT.

Contractor staff at Mathematica Policy Research will have access to IESDC and upload study data collected through RAPTER and ConfirmIT through secure transfer to IESDC, where all data analysis will take place.

In order to match with the administrative databases of FSA and the U.S. Department of Health and Human Services (*i.e.,* the National Directory of New Hires), contracting staff at Mathematica Policy Research will upload a file with learner identifiers (names, dates of birth, SSNs) through secure transfer to IESDC. IES staff will receive files containing the matched data from FSA and the U.S. Department of Health and Human Services through secure transfer from IESDC, where contracting staff will also have access for the purpose of data analysis.

3.5. Privacy law and policy generally requires agencies to collect or maintain only the minimum amount of PII necessary to accomplish an authorized purpose. For each of the PII elements that are indicated in Question 3.1, please describe why the information is necessary.

The study requires contact information of adult learners and career navigators in order to provide these individuals with the notices contained in Section 4.3. Adult learners' names and addresses are necessary to notify learners of their inclusion in the study and give them an opportunity to opt out. Similarly, the names and work email addresses of the career navigators are necessary to notify these individuals of their inclusion in the study and provide them access to the study's voluntary survey.

Adult learners' names as well as other identifying information including date of birth and SSN are also required in order for the study to match records with administrative data sources. Without these, the study would not be able to obtain information regarding learners' education and employment outcomes. Without these outcome data, the study would not be able to examine whether the training leads to improvements on these outcomes.

Other biographical and demographic information regarding learners and career navigators is needed in order for the study to be able to describe the characteristics of the participants in the study, examine equivalency between the groups assigned by lottery to

receive the study's training or not, and to increase the precision of estimates of the impact of the training on learner outcomes. This includes learners' gender/sex, race/ethnicity, citizenship, marital status, and educational background. For navigators, this includes gender/sex, race/ethnicity, and year of birth.

The study requires navigator's employment information (salary and benefits) in order to estimate the costs of navigators' time participating in the study's training. This is necessary in order for the study to estimate the full cost of implementation of the training.

Finally, the system maintains user IDs and passwords for career navigators and other program intake staff in order to allow those individuals with access to RAPTER.

3.6. Who can access the information maintained in the IT system?
    ☒ Federal Employees
    ☒ Federal Contractors
    ☐ General Public (Any individual not employed by the Department)

3.7. How is the PII validated or confirmed to ensure the integrity or quality of the information (e.g., form restricting, verifying newly collected information matches previously collected information, account verification, periodically requesting system users verify their own information in the system)?

All data will undergo quality-control checks. For example, programmatic checks will be built into online surveys including alpha-numeric and range restrictions and validations; numeric fields such as SSNs will not allow letters and name fields will not allow numbers. For administrative data collected as files (not entered manually by individuals on a survey), non-conforming values such as basic skills test scores that fall outside the range of possible scores will be flagged for review and correction.

Information Use for Testing

3.8. Is the PII maintained in the IT system used for internal testing, training, and researching new applications or information systems?

No

    3.8.1. If the above answer to question 3.9 is **YES**, are you authorized to use PII when such information is used for internal testing, training, and research?
        ☑ N/A

> Click here to select.

3.8.2. If the above answer to question 3.9 is **YES,** what controls are in place to minimize the privacy risk and protect the data?

☑ N/A

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 IT system collect or maintain Social Security numbers (SSNs)?

> Yes

3.9.1. If the above answer to question 3.10 is **YES**, cite the authority for collecting or maintaining the SSNs.

☐ N/A

The collection of SSNs for this study are authorized under Section 242 of Title II of the Workforce Innovation and Opportunity Act of 2014. It is also authorized under Section 173 of the Education Sciences Reform Act of 2002 and Executive Order 9397, as amended by Executive Order 13478 (November 18, 2008).

3.10.2. If the above answer to question 3.10 is **YES**, explain the purpose for the collection/maintenance and how the SSNs are used.

☐ N/A

SSNs will be used to match with national administrative databases including those of the National Student Clearinghouse, the National Directory of New Hires, FSA, and vendors of high school equivalency tests. This matching will allow the study to obtain education and employment-related data on learners in order to examine whether providing a promising model of training to career navigators leads to improved learner outcomes in these areas.

3.10.3. If the above answer to question 3.10 is **YES**, specify whether the collection of the SSNs is mandatory or voluntary. What are the consequences for the individual of not providing the SSN, if any?

☐ N/A

The collection of SSNs is voluntary. There are no consequences to adult learners for not providing an SSN.

3.10.4. If the above answer to question 3.10 is **YES**, specify any alternatives to SSNs that were considered and explain why they were not used.

☐ N/A

While alternatives were considered, the study would not be able to adequately assess the impact of the career navigator training on learners' education and employment outcomes without the collection of SSNs. SSNs provide the most reliable method of matching learners to administrative databases.

4. **Notice**
   4.1. How does the IT system provide individuals with a privacy notice about the collection, maintenance, use, and disclosure of PII prior to its collection? For example, does the IT system provide a Privacy Act Statement (if applicable) or other privacy notices provided at the point of collection? If a notice is not provided, explain why not.

   Learners and career navigators at study sites will be provided with direct notice of the intention of the study to collect PII. This will occur via an opt-out form sent to learners upon their enrollment in adult education courses at study sites and a form provided to career navigators through RAPTER and ConfirmIT at the start of the study, A System of Records Notice as well as this PIA will also be publicly posted.

   4.2. If you, or a partner, maintain a program website that is not hosted on the ed.gov domain and is accessible to the public, does the program website have a webpage privacy policy?

   ☐ N/A

   [Yes]

   4.3. Provide a link to the webpage where the privacy notice referenced in Question 4.1 is posted. If there is no publicly accessible link, provide the text of the privacy notice. Do not include security banners, security notices, Paperwork Reduction Act statements, or other notices not specifically related to privacy.

   ☐ N/A

For learners, the opt-out form will contain the following text:

Dear [INSERT FIRST, LAST NAME]:

You recently enrolled in an adult education program at [PROGRAM NAME]. This adult education program and its career navigator(s) are taking part in a national study that the U.S. Department of Education is sponsoring. This study will help the agency learn more about the effects of providing training for career navigators who work with adult learners. Mathematica is leading this study and partnering with Manhattan Strategy Group and Social Policy Research. Once you enrolled in Your Program, you automatically became a participant in the Study and will remain a participant in the Study unless and until you choose to "opt out" as described below.

Navigators are people who provide services to help students transition to jobs, college, and other training. Other names for career navigators are college navigators, coaches, transition coordinators, counselors, or case managers. The study will compare two groups of career navigators. One group will receive training as part of the study now. The other group will receive the training two years from now. The study team will randomly choose the group of navigators that receives the training now using a process like a coin flip. All career navigators at your adult education program are in the same group. You will not know whether they have received the training.

We would like to welcome you as a participant in the study. Your participation in this study is extremely valuable because it will help ED learn about how career navigators may help adult learners succeed in achieving their education and employment goals. As a participant in this study:

- Your adult education program may share information with the study team about you and the services you receive from the program.
- The Study Team may share a file that contains limited personally identifiable information (PII) such as your name, date of birth, and/or Social Security number with various federal agencies and other data providers. The data providers will use the file to provide information to the Study Team about your employment, earnings, and education for the duration of the Study. This Study Data could include:
    - Information about your job(s) from the National Directory of New Hires (NDNH)
    - Information about your education from the National Student Clearinghouse (NSC), Federal Student Aid (FSA), and high school equivalency test providers (e.g., GED TASC and HiSET)

Here are some other things to know about the Study:

- The researchers conducting this study follow the confidentiality and data protection requirements of the U.S. Department of Education's Institute of

Education Sciences (The Education Sciences Reform Act of 2002, Title I, Part E, Section 183).

- The study is authorized under Section 242 of Title II of the Workforce Innovation and Opportunity Act of 2014 and Section 173 of the Education Sciences Reform Act of 2002. The collection of social security numbers is authorized under Executive Order 9397, as amended by Executive Order 13478 (November 18, 2008).
- The study will use your data for research purposes only.
- Study reports will summarize all learners' findings and will not identify you. None of the reports prepared for this study will include information that identifies you.

Although there are always some risks when personal information is collected, the Study Team has put many safeguards in place to securely store this data and maintain the confidentiality and privacy of the personal information being collected.

There are also no direct benefits.

OPTING OUT. As a current enrollee in [PROGRAM NAME] who received this form, you presently are a participant in the Study. Participation in the Study, however, is voluntary. If you do not wish to participate in the Study you may "opt out" of the Study at any time by contacting the Study Team via email to adultedstudy@mathematica-mpr.com or by toll-free phone call to (XXX) XXX-XXXX. For more information about the Study or answers to any questions, you also may contact the Study Team at adultedstudy@mathematica-mpr.com.

Thank you in advance for your assistance with this important research.

For career navigators, the opt-in form will include the following text:

The U.S. Department of Education is sponsoring a study of career navigation training called Connecting Adults to Success: Evaluation of Career Navigator Training. The study is authorized under Section 242 of Title II of the Workforce Innovation and Opportunity Act of 2014 and Section 173 of the Education Sciences Reform Act of 2002.

Mathematica is conducting this study for the Department in partnership with Manhattan Strategy Group and Social Policy Research. As a reminder, [ADULT EDUCATION PROVIDER SITE] agreed to participate in this study.

The purpose of the study is to understand the effects of training for career navigators on learners' education and employment outcomes.

- Career navigators may also be referred to as career coaches, career advisors, career consultants, career counselors, college navigators, transition coordinators, or case managers, among others.

- Learners may also be referred to as students, clients, or customers.

The study will compare learners enrolled in adult education services in two different groups of providers, one where career navigators receive training in the fall of 2022, and one where career navigators receive training two years later. Your provider was assigned to a group based on a random process, like a coin flip. All career navigators at your site are in the same group.

Today, you are being asked to take a short survey about your background and training as well as your experience as a career navigator. Your participation in this survey is important and will help us learn about the different experiences of career navigators. This survey will take about 30 minutes to complete, depending on your responses. Participation in the survey is completely voluntary and you may choose to skip any question you prefer not to answer. There are no consequences if you decide not to answer If you are unsure of how to answer a question, please give the best answer you can rather than leaving it blank.

As part of the study, you will also be asked to complete short, 3-minute, logs after each meeting with learners enrolled in the study. You will receive a training on the process at a later date.

The researchers conducting this study follow the confidentiality and data protection requirements of the U.S. Department of Education's IES (The Education Sciences Reform Act of 2022, Title I, Part E, Section 183). All your responses will be kept private and used only for research purposes, and will not be disclosed outside of IES. Your responses will be combined with the responses of other respondents and no individual names will be reported. While there are no direct benefits to participants, your participation will help us learn about career navigators and how career navigation training relates to student outcomes.

☐ By clicking this box, you are confirming that you understand that the information you provide will be kept private and used only for research purposes. You further understand that your answers will be combined with the responses of other navigators so that no individuals will be identified.

4.4. What opportunities are available for individuals to consent to uses of their PII, decline to provide PII, or opt out of the project? If these options are not available, state why not.

Participation in the study's data collection is voluntary. Learners can decline to participate in the study, decline to take the study's background survey, or to provide particular pieces of information requested in the survey. Career navigators can also decline to take the study's surveys or provide particular pieces of information requested on the surveys. More generally, participation in the study itself by adult education sites,

career navigators and learners is voluntary; and these participants are allowed to drop out of the study after it has begun.

4.5. Is the notice referenced in Question 4.1 reviewed and revised when there are changes in the practices, policies, or activities that affect the PII and the privacy risks to ensure that individuals are aware of and, where feasible, can consent to, these changes?

Yes

5. Information Sharing and Disclosures

Internal

5.1. Is PII maintained in the IT system shared internally with any other Department IT system(s) and/or principal offices? If the answer is **NO**, skip to Question 5.4.

Yes

5.2. Which categories of PII from Question 3.1 are shared and with which Department IT system(s) and/or principal offices?

☐ N/A

Learners' names, dates of birth, and SSNs will be shared with FSA.

5.3. What is the purpose for sharing the specified PII with each Department IT system(s) and/or principal office specified in Question 5.2?

☐ N/A

This is for the purpose of matching with FSA's Central Processing System and National Student Loan Data System to obtain information on learners' college enrollment. Because the National Student Clearinghouse does not provide comprehensive coverage of all postsecondary institutions in the country, supplementing data with that of FSA provides more accurate estimates of college enrollment than relying on the National Student Clearinghouse alone.

External

5.4. Is PII maintained in the IT system shared with any external entities (e.g., another agency, grantee, school district, the public)? If the answer is **NO**, skip to Question 6.1.

Yes

5.5. Which categories of PII from Question 3.1 are shared and with whom?

☐ N/A

Learners' names, dates of birth, and SSNs will be disclosed to the National Student Clearinghouse, vendors of tests for high school equivalency credentials, and the U.S. Department of Health and Human Services (which houses the National Directory for New Hires). These disclosures are for the purpose of obtaining data on learners' high school equivalency credential attainment, postsecondary enrollment, employment status, and earnings.

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 researchers who are approved license holders and are in compliance with NCES' data security procedures. The data file will exclude direct identifiers, such as participant name, date of birth, and SSN, but will include other individual-level data collected for the study.

5.6. What is the purpose for sharing the PII with each external entity specified in Question 5.5?

☐ N/A

The names, dates of birth, and SSNs of study participants will be shared with the National Student Clearinghouse, high school equivalency testing vendors, and the U.S. Department of Health and Human Services in order to match with the administrative records of these entities. This will allow the study to obtain data on learners' education and employment outcomes and thus to estimate the impacts of the career navigator training on these outcomes.

The restricted use data file will be for the purpose of allowing licensed researchers to replicate the study's findings and conduct further analyses of the study's data.

5.7. What are the specific authorities that authorize sharing the PII with the external entities specified in Question 5.5?

☐ N/A

This study and sharing of data is authorized under Section 242 of Title II of the Workforce Innovation and Opportunity Act of 2014. It is also authorized under Section 173 of the Education Sciences Reform Act of 2002.

5.8. Does the IT system maintain an accounting of any disclosures made to an external entity?

☐ N/A

☑ Yes

5.8.1. If so, is the accounting of disclosures made to external entities available in response to a Privacy Act request?

☑ Yes

5.9. How is the PII shared with the external entity (e.g., encrypted email, transport layer security (TLS) line)? Specify whether the PII is encrypted in transit and state the encryption method that is used.

☐ N/A

Learners' names, dates of birth, and SSNs will be transmitted electronically from the contractor to the external entity using a secure file transfer protocol.

The restricted use data file will be provided to licensed researchers on encrypted, password-protected CD.

5.10 Is the sharing conducted pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or other type of approved sharing agreement with the external entities?

☐ N/A

☑ Yes

5.11 Does the project allow for the PII to be redisclosed by the external entities or require the external entities to request permission prior to its redisclosure? If so, describe the limitations on redisclosure and how they are documented and enforced.

☐ N/A

☑ No

6. **Redress**

   6.1. What are the procedures that allow individuals to access their own information in the IT system? If there are no such procedures, state why not.

   If an individual wishes to gain access to a record in this system, they can contact the system manager at the address listed in the SORN. The request must provide necessary particulars of their full name, address, telephone number, and any other identifying information requested by the Department, to distinguish between individuals with the same name. The request must meet the requirements of regulations at 34 CFR 5b.5.

   In addition, study participants may call or send an email to the contact provided on the opt-out and informed consent forms. The participants may also send an email to: IES_SORN@ed.gov.

   6.2. What procedures are in place to allow individuals to correct or amend inaccurate or erroneous information?

   If an individual wishes to contest the content of a record regarding themselves, they can contact the system manager at the address listed in the SORN. Requests must contain their full name, address, and telephone number. The request must meet the requirements of the regulations at 34 CFR 5b.7.

   In addition, study participants may call or send an email to the contact provided on the opt-out and informed consent forms. The participants may also send an email to: IES_SORN@ed.gov.

   6.3. How does the program or IT system notify individuals about the procedures for accessing or correcting their information?

   The procedures for accessing and amending record(s) for external users are outlined in the SORN entitled "Connecting Adults to Success: Evaluation of Career Navigator Training" (18-13-46).

7. *Safeguards*
   If you are unsure which safeguards will apply, please consult with your ISSO.

   7.1. Does the principal office work with their ISSO to build privacy and security safeguards into the IT system?

   Yes

7.2. Is an authorization to operate (ATO) required for the IT system?

No

CATS will be covered under the IES Data Center (IESDC) ATO. Contractor systems will be used for the original data collection phase of this work. Once collected, those data will be transferred to the IES Analysis Server, housed on IESDC. Administrative data linkage, data analysis, reporting, and long-term data storage will all occur within IESDC.

7.2.1. If the answer to Question 7.2 is **YES**, does the IT system have an active ATO?

IESDC has an active ATO.
Yes

7.3. What is the NIST Federal Information Processing Standard 199 security categorization of this IT system?
☐ Low
☒ Moderate
☐ High

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

Security protocols for this system of records meet all required security standards. Data are collected and stored in compliance with Federal standards for the use, protection, processing, and storage of data consistent with the Education Sciences Reform Act of 2002. Access to individually identifying data will be strictly controlled. The contractor is required to ensure that electronic files identifying individuals are separated from other electronic research data files. The contractor and IES will maintain security of the complete set of all master data files and documentation.

Contractor staff at Mathematica Policy Research will upload study data collected through RAPTER and Confirmit through secure transfer to the IESDC, where all data analysis will take place.

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. 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 Department 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. 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). The contractor employees undergo privacy awareness and protecting information training. The training includes information on what constitutes PII and Sensitive PII (SPII) and how to maintain, protect, and safeguard it, as well as the steps to perform if PII/SPII is unlawfully accessed.

8. **Auditing and Accountability**

   8.1. How does the ISO assess and ensure that the PII 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. As part of this regular contact with the contractor, the system owner is also apprised of any problems that may be detected based on the specific controls that contractors routinely implement, such as self-assessments of security controls and performance of periodic vulnerability scans; updating all information system and security documentation as changes occur; and other continuous monitoring activities.

   8.2. How does the ISO continuously monitor and audit the security and privacy controls to ensure effective implementation and safeguarding of PII?

   IESDC is required to obtain and maintain an ATO. This process includes an independent assessment of all required security and privacy controls and produces plans of action and milestones (POA&Ms) to ensure any deficiencies are remediated. IEDC also participates in the Ongoing Security Authorization (OSA) Program and continuous monitoring program. The OSA, which reviews security and privacy controls, is conducted quarterly,

and the system is scanned continuously to ensure that security and privacy controls are in place and working properly.

8.3. What are the specific privacy risks associated with this program or IT system and how are those risks mitigated?

There are potential privacy risks associated with collecting survey data from adult learners and career navigators and obtaining administrative data regarding learners. Data breaches involving PII are potentially hazardous to both individuals and organizations. Individual harm may include identity theft, embarrassment, or financial loss. Organizational harm may include a loss of public trust, legal liability, or remediation costs.

The primary risk is that learners and navigators in the study will be identified, and the information collected on them compromised. To mitigate these risks, access to information is granted only to authorized individuals based on their respective position and need-to-know basis, limiting users to those who are screened, utilizing least privilege principles, and encrypting all data in transmission. 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.