Privacy Impact Assessment (PIA)
for the

Text ED: Study of Text Messaging to Improve College Enrollment Rates Among Disadvantaged Adults
November 22, 2019

For PIA Certification Updates Only: This PIA was reviewed on **November 19, 2019** by **Melanie Ali** certifying the information contained here is valid and up to date.

Contact Point

Contact Person/Title: Melanie Ali
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System Owner

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

Please submit completed Privacy Impact Assessments to the Privacy Office at
privacysafeguards@ed.gov

FY 2020

*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.

1. **Introduction**

    1.1. Describe the system including the name, acronym, and a brief description of the program or purpose for the system.

    The project, "Text Ed: A Study of Text Messaging to Improve College Enrollment Rates Among Disadvantaged Adults," is rigorously evaluating whether the use of a promising, low cost text messaging strategy can help Education Opportunity Center (EOC) grantees meet the program's goal of increasing college enrollment among disadvantaged adults. EOCs, which are part of the TRIO family of programs, provide informational services related to the college-going process and financial aid options. Many of the clients served by EOCs are adults who are low-income and potential first-generation college goers. This study is being conducted under legislative mandate to study promising practices with the potential to improve outcomes for the Department's TRIO programs. TRIO programs are federal outreach and student services programs designed to identify and provide services for individuals from disadvantaged backgrounds

    The project will examine the implementation of the text messages within the 18 EOCs that volunteered to participate in the study, and the impact of the messages on clients' rates of completion of the Free Application for Federal Student Aid (FAFSA) and enrollment in college. The text messages are delivered through a messaging service provided by Signal Vine.

    Study data will be stored at the following locations:

    MDRC, 19th floor, 16 East 34th Street, New York City, NY 10016-4326.

    Signal Vine, 811 North Royal Street, Alexandria, VA 22314-1715.

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

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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. OMB Circular A-130, page 33

The data will be used to describe the implementation of the study's text messaging intervention and to estimate the impact of the intervention on study participants' rates of FAFSA completion and college enrollment. Along with enrolling in college, helping clients to access financial aid is a key goal of EOCs. The study complies with the legislative mandate that ED conduct studies of strategies to improve outcomes for TRIO programs.

PII is being collected in order to randomly assign the clients who volunteer to participate in the study to a group that gets the evaluation's text messages or a group that does not, to obtain outcome data on FAFSA completion and college enrollment from the Office of Federal Student Aid and the National Student Clearinghouse, to describe the background characteristics of study participants, and potentially to create subgroups for analysis based on background characteristics. For clients who are assigned to receive the evaluation's text messages, information on the text messaging is also being collected and maintained in order for the evaluation to describe implementation and appropriately interpret impact estimates.

Ultimately, the findings from this evaluation will be used to determine whether systematic, personalized text messaging is a useful enhancement to EOCs' existing services. Aggregate findings from the study will be presented in a written report that will be publicly available and shared with the EOCs and relevant Department of Education offices. The data from the evaluation with PII will not be publicly released.

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?

Updated PIA

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

Contractor

    1.5.1. If the system is operated by a contractor, does the contract or other acquisition-related documents include privacy requirements?
      ☐ N/A
        Yes

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? Please include name and citation of the authority.

The study is authorized under sections 171(b) and 173 of the Education Sciences Reform Act of 2002 (ESRA)(20 U.S.C. 9561(b) and 9563) and under Section 402(H) of the Higher Education Opportunity Act of 2008 (20 U.S.C. 1070a–18). These pieces of legislation provide IES with authority to conduct studies of promising strategies with potential to improve outcomes for TRIO programs.

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?

Yes

2.2.1. If the above answer is **YES,** this system will need to be covered by Privacy Act System of Records Notice(s) (SORN(s)).[2] Please provide the SORN name, number, Federal Register citation and link, or indicate that a SORN is in progress.

☐ N/A

"Text Ed: A Study of Text Messaging to Improve College Enrollment Rates Among Disadvantaged Adults (18-13-41)" was published in the Federal Register on December 14, 2018. 83 FR 64338.
https://www.federalregister.gov/documents/2018/12/14/2018-27144/privacy-act-of-1974-system-of-records

2.2.2. If the above answer is **NO**, explain why a SORN was not necessary. For example, the information is not retrieved by an identifier, the information is not maintained in a system of records, or the information is not maintained by the Department, etc.

☑ N/A

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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

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. What is the records retention schedule approved by National Archives and Records Administration (NARA) for the records contained in this system? Please provide all relevant NARA schedule numbers and disposition instructions.

    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.

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

    Yes

3. Characterization and Use of Information

Collection
    3.1. List the specific PII elements (e.g., name, email, address, phone number, date of birth, Social Security, etc.) that the system collects, uses, disseminates, or maintains.

    The project includes personally identifying information on adults who volunteer to participate in the study, including name, contact information, date of birth, sex, race/ethnicity, income, Social Security Number, educational background and plans, whether the participant is a caretaker for children, parents' educational background, primary language spoken, FAFSA completion status, and college enrollment status. For the subset of adults who volunteer to participate in the evaluation and are randomly assigned to receive the study's text messages, the project will also include information related to the text messages. This includes the following: the direction of the message (sent to client / received by client), the verbatim message content; and the date and time the message was sent.

    3.2. Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2?

    Yes

3.3. What are the sources of PII collected (e.g., individual, school, another agency, commercial sources, etc.)?

The study includes individual-level data on adults who volunteer to participate in the study. The sources of these data are EOC sites' administrative records, a survey administered to and regarding adults who volunteer to participate in the study, FSA administrative records, National Student Clearinghouse records, and the text messaging platform provider's records.

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

Data from the Federal Student Aid (FSA) Office, the National Student Clearinghouse and the text messaging platform provider, and study EOCs will be collected electronically. FSA data will be obtained through a data pull conducted on-site at the FSA Office. Data from the National Student Clearinghouse (NSC), the text messaging provider and study EOCs will be collected via a secure transfer file transfer website. A small amount of background information on participants not available through EOC records will be collected via a participant survey. The participant survey is electronic, although paper copies are available for situations in which participants do not have internet access.

3.5. How is the PII validated or confirmed to ensure the integrity of the information collected?[3] Is there a frequency at which there are continuous checks to ensure the PII remains valid and accurate?

PII is validated upon data entry by using restricted form filling within the participant survey for name, date of birth, social security number, and telephone number(s); name data must contain more than two letters and must match data on second confirmation screen, date of birth must indicate that someone is greater than either 17 years old and less than 100 years old and must match date provided on second confirmation screen, SSN must contain 9 digits, and telephone number must contain 10 digits and must match data provided on second confirmation screen. The text messaging platform provider checks for duplicate cell phone numbers and flags cell phone numbers that have been marked as invalid by cell phone carriers. Validation of integrity for the PII that is sourced from administrative records of EOCs, FSA, the National Student Clearinghouse, or the text messaging platform provider will rely on the methods of those entities.

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[3] Examples include restricted form filling, account verification, editing and validating information as it's collected, and communication with the individual whose information it is.

All PII is reviewed for odd and outlier values on a quarterly basis. Study participants are not routinely contacted to confirm whether their PII changes over time. Participants who receive the texting intervention may have their names and phone numbers verified and updated through their ongoing contact with EOC staff.

Use

3.6. Describe how the PII is used to achieve the purpose stated in Question 1.2 above.

The information collected will be used to describe the implementation of the study's text messaging intervention and to estimate the impact of the intervention on study participants' rates of FAFSA completion and college enrollment. The study addresses the following research questions: Does providing personalized messages to EOC participants increase FAFSA completion rates? Does it increase college enrollment rates? What are participants' experiences with the text messages (for instance, how often do they receive the messages? How often do they text back in response?)? To what extent does the effectiveness of the messaging vary across EOC grantee sites? To what extent does the effectiveness vary across participant subgroups?

3.7. Is the system using PII for testing/researching new applications or information systems prior to deployment or for training employees?

No

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

☑ N/A

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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.

3.8. Does the system collect Social Security Numbers? Note that if the system maintains Social Security Numbers but does not explicitly collect them, answer 3.8.1 to address the purpose for maintaining them.

Yes

3.8.1. If the above answer is **YES**, explain the purpose for its collection, and how the SSN will be used.

☐ N/A

Many, but not all, EOCs already collect Social Security Numbers from clients, and only EOCs who are willing to do so are included in the study. This is necessary for the evaluation to be able to accurately match study participants to records maintained by the Office of Federal Student Aid and the National Student Clearinghouse. Study participants provide active consent to the disclosure of Social Security Numbers to the National Student Clearinghouse.

3.8.2. Specify any alternatives considered in the collection of SSNs and why the alternatives were not selected.

☐ N/A

Without the collection of Social Security Numbers, the evaluation will not be able to adequately examine impacts on FAFSA completion and college enrollment rates, which are key outcomes for the EOC program. Matching study participants to Federal Student Aid and National Student Clearinghouse records based on name and date of birth alone would substantially reduce the study's ability to detect impacts and meet the legislative mandate to evaluate strategies to improve TRIO program outcomes.

4. **Notice**

   4.1. How does the system provide individuals with notice about the collection of PII prior to its collection (e.g., direct notice, such as a Privacy Act Statement (if applicable) or public notice, such as a SORN, PIA,)? If notice is not provided, explain why not.

   As noted under 2.2.1, a SORN was published on December 14, 2018.

   In addition, study participants provide active consent through an informed consent form provided by EOC staff prior to the study's collection of PII.

   4.2. Provide the text of the notice or the link to the webpage where the notice is posted if notice is provided other than by SORN or PIA.

   ☐ N/A

   The study's informed consent form contains the following language:

   "If you agree to take part in the study, the information you provided at intake (name, date of birth, contact information, Social Security Number, and other

background/demographic information) will be shared with the Manpower Demonstration Research Corporation (MDRC) study team. You will also be asked to provide some additional information via a Study Enrollment Form. This information will also be shared with the MDRC study team. Updates to the information you provide via the Study Enrollment Form may also be shared with the MDRC study team by EOC staff.

Using some of the information you provided when you signed up at the EOC – specifically, your name, date of birth, and Social Security Number -- the study team will obtain college enrollment information from educational institutions and the National Student Clearinghouse (NSC) database, as well as financial aid information (whether or not you submitted the Free Application for Federal Student Aid (FAFSA) and the award amount) from the Department of Education's Federal Student Aid (FSA) database. If you are placed in the "EOC Services plus *Text Ed* Group," the study team will also collect details of the *Text Ed* text messages.

…Your participation in the study is voluntary, and will not affect your access to the regular EOC programs and services at [site]. If you join the study and are selected to receive the *Text Ed* messages, you may choose to stop receiving the messages at any time. You may also ask to opt out of the study at any time. If you withdraw from the study, any information collected by the study team before that time may still be used for the study. If you choose not to participate in the study, you may still access regular EOC programs and services, but you will not have the opportunity to receive the *Text Ed* text messages.

4.3. What opportunities are available for individuals to consent to uses (including new uses of previously collected PII), decline to provide PII, or opt out of the project?

Participation in the study is voluntary. Clients may choose not to participate in the evaluation and thus not to provide PII to the project. Clients opt out of the project by not signing the informed consent. Clients who opt out can continue to receive EOCs' typical services.

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

Yes

5. Information Sharing and Disclosures

Internal
5.1. Will PII be shared internally with other ED principal offices? If the answer is **NO**, please skip to Question 5.4.

Yes

5.2. What PII will be shared and with whom?

☐ N/A

The names, dates of birth, and Social Security Numbers of study participants will be shared internally with the Federal Student Aid Office.

5.3. What is the purpose for sharing the specified PII with the specified internal organizations?

☐ N/A

This is for the purpose of matching participants to the administrative records of the Federal Student Aid Office, in order to obtain FAFSA completion outcomes for study participants. This aligns with the stated purpose in Question 1.2—specifically, estimating the impact of the text messaging on FAFSA completion rates among EOC participants, in order to inform improvements to the EOC program.

External
5.4. Will the PII contained in the system be shared with external entities (e.g. another agency, school district, the public, etc.)? If the answer is **NO**, please skip to Question 6.1.

Yes

5.5. What PII will be shared and with whom? List programmatic disclosures only.[4]
Note: If you are sharing Social Security Numbers externally, please specify to whom and for what purpose.

☐ N/A

Each study EOC will be provided the names of the EOC's study participants assigned to receive text messages.

Signal Vine, the text messaging platform provider, will be provided the names of the study participants assigned to receive text messages, as well as those participants'

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[4] If this information is covered by Privacy Act System of Records Notice (SORN) please list only relevant programmatic disclosures listed under the Routine Uses section.

unique research ID, cell phone number, information related to the status of their college and FAFSA applications, information related to their work and childcare plans, and the EOC at which the participant receives services.

The names, dates of birth, and Social Security Numbers of study participants will be shared with the National Student Clearinghouse in order to collect information from the Clearinghouse on college enrollment.

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, including participant name, date of birth, and Social Security Number.

5.6. What is the purpose for sharing the PII with the specified external entities?

☐ N/A

In order to permit EOC staff to communicate via text message with participants assigned to receive text messages, study EOCs will be provided with the names of participants who are randomly selected to receive the messages.

The information described above regarding participants assigned to receive text messages will be shared with Signal Vine for the purpose of Signal Vine sending the automated text messages to the participants.

The names, dates of birth and Social Security numbers of study participants will be shared with the National Student Clearinghouse in order to match participants to the National Student Clearinghouse's administrative records on college enrollment. This will allow the study to estimate the impacts of the text messaging on college enrollment rates, consistent with the stated purpose in Question 1.2.

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

5.7. Is the sharing with the external entities authorized?

☐ N/A

Yes

5.8. Is the system able to provide and retain an account of any disclosures made and make it available upon request?

☐ N/A

☑ Yes

5.9. How is the PII shared with the external entity (e.g. email, computer match, encrypted line, etc.)?

☐ N/A

The names of study participants who are randomly selected to receive the text messages will be disclosed to study EOCs through Signal Vine's secure website.

Data shared between the contractor and Signal Vine occurs through secure file transfer.

Study participants' names, dates of birth, and Social Security Numbers will be transmitted electronically from the contractor to the National Student Clearinghouse, using a secure file transfer protocol. The MDRC study team maintains an MOU with the National Student Clearinghouse.

The restricted use data file will be provided to licensed researchers on encrypted, password-protected CD. Researchers must sign a memorandum of understanding with the Department before being granted access to the data file

5.10. 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

☑ Yes

5.11. Does the project place limitation on re-disclosure?

☐ N/A

☑ Yes

6. Redress

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

Individuals may access their information by calling, emailing, or visiting the EOC grantee site through which they are enrolled. Individuals may also send an email to: IES_SORN@ed.gov as indicated in the SORN listed in Section 2.

6.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individuals may correct inaccurate contact and background information by calling, emailing, or visiting the EOC grantee site through which they are enrolled. Individuals may also send an email to: IES_SORN@ed.gov as indicated in the SORN listed in Section 2.

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

Individuals are notified of the procedures for correcting their information through their EOCs and through the publication of the SORN and this PIA.

https://www.federalregister.gov/documents/2018/12/14/2018-27144/privacy-act-of-1974-system-of-records

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?

Yes

7.2. Is an Authority to Operate (ATO) required?

No

7.3. Under NIST FIPS Pub. 199, what is the security categorization of the system: **Low, Moderate, or High?**
☐ N/A

Moderate

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

Data are collected and stored in compliance with federal standards for the use, protection, processing, and storage of data consistent with the Privacy Act and the Education Sciences Reform Act of 2002. Access to individually identifying data will be strictly controlled. Safeguards include password-based and two-factor authentication, role-based access control, data encryption and physical data center security. 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.

7.5. Is the information in the system appropriately secured in accordance with the IT security requirements and procedures as required by Federal law and policy?

Yes

7.6. Has a risk assessment been conducted where appropriate security controls to protect against that risk have been identified and implemented?

Yes

7.7. Please describe any monitoring, testing or evaluation conducted on a regular basis to ensure the security controls continue to work properly at safeguarding the PII.

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

The contractor conducts vulnerability assessments of the information system by performing authenticated operating system scans on a monthly basis. The contractor also performs database and web application scans on a monthly basis using authenticated credentials. On a monthly basis, the contractor validates that the functions, ports, protocols and services are limited to those that are defined as permitted functions, ports, protocols and services.

Vulnerability scans are conducted routinely by the contractor's Security System Administrators or designee. Vulnerability scans are authorized and conducted on all virtual network resources, virtual servers, applications:
- Monthly

- Randomly
- Prior to resources, servers, and applications entering the network
- Prior to web applications moving into production
- When significant new vulnerabilities potentially affecting the system(s) are identified and reported.

8. Auditing and Accountability

8.1. How does the system owner 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.

8.2. Does the system owner continuously monitor and audit the privacy controls to ensure effective implementation?

Yes

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

The primary risk is that adults participating in the study will be identified and their Social Security Numbers compromised. To mitigate these risks, study participants are assigned an ID that is not based on their Social Security number. Directly identifying information such as SSNs are maintained in a separate file from other study data. The risk of identification and compromise of SSNs is further mitigated by granting access to only 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.