Privacy Impact Assessment (PIA)
for the

Office of English Language Acquisition (OELA) Program Support Systems
March 12, 2021

For PIA Certification Updates Only: This PIA was reviewed on Enter date by Name of reviewer certifying the information contained here is valid and up to date.

Contact Point

Contact Person/Title: Andy Simpson, Director of IT
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System Owner

Name/Title: Melissa Escalante
Principal Office: OELA

*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 U.S. Department of Education's (Department) Office of English Language Acquisition (OELA) uses two information systems to fulfill its mission for our English learner stakeholders. The National Clearinghouse for English Language Acquisition (NCELA), serves and supports our external stakeholders and the Knowledge Management System (KMS), serves our program grantees. Since the two systems support OELA's overall objectives and present similar privacy risks, both systems are assessed in this document.

    OELA system 1, NCELA, is a public-facing information system that includes a website along with software, hardware, and a database, authorized by Section 3202 of Title III of the Elementary and Secondary Education Act (ESEA), to support OELA. NCELA collects, coordinates, and disseminates a broad range of research and resources in support of an inclusive approach to high-quality education for English learners (ELs). NCELA supports the dissemination of resources for state-level administrators of Title III programs. In addition to State Education Agency (SEA) coordinators, NCELA serves other stakeholders involved in EL education, including teachers and other practitioners, parents, university faculty, administrators, and federal policymakers. The purpose of NCELA is to help increase state capacity to assist districts and schools in improving EL student performance, language instruction educational programs, and English language proficiency.

    The NCELA website includes the Department's contact information (e.g., phone, email), including staff names, an interface for users to submit remote learning resources, questions, comments, and feedback, as well as register for newsletters, search for resources using resource library, access factsheets, and access artifacts from meetings and conferences. In addition, the system contains point of contact information for the Title III state coordinators. The NCELA website utilizes Constant Contact to allow users to register for newsletters and includes a "Contact Us" form to allow users to ask general questions or receive assistance from the NCELA team. Constant Contact is a third-party servicer that supports the Department by distributing a newsletter using an email list.

    OELA system 2, the Knowledge Management System (KMS), is an information system that helps OELA to further its mission to promote EL achievement along with the public-facing NCELA system. The KMS system is a password protected system used only by OELA's program officers and grant directors. The system provides a place to allocate

budget, monitor performance, and generate reports. Grantees (the legal entity to which a grant is awarded and that is accountable to the Federal Government for the use of the funds provided) log in to the system to submit grant performance documentation, interact with peers through discussion board, and access resources. NCELA and KMS do not interact with each other. They are related as they support OELA objectives.

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

NCELA
Contact Us Form
The Department collects name and contact information from the public through a web form when users elect to contact OELA. An email is then generated by the website and sent to the NCELA project team.

Purpose: This information is collected so that the project team can answer questions or provide general help about NCELA.

Title III Office Contact Information
The Department collects contact information for state-level administrators through the Consolidated State Performance Report (CSPR). CSPR data is self-reported performance data from each of the SEAs.

Purpose: Title III grantee office contact's name and contact information is collected in order to communicate with the grantees and the information made available to the public. The Title III SEA contact information is provided on each of the SEA's public websites. The Department simply provide the same information in a consolidated location.

Constant Contact – Email List Subscription Signup Form
Visitors may provide contact information to Constant Contact, an email marketing service used to send mass communications to lists of subscribers.

Purpose: Visitors' contact information is collected on the NCELA website through an embedded form provided by Constant Contact to sign up to receive the Nexus Newsletter via email.

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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

<u>Grant Application</u>
The grant application provides information about the entity and a point of contact for the application. The information shown in the Grant Application documents, is collected through the grant application process. The Department collects the data through the application process through the G5 system @ www.G5.ed.gov

Purpose: The grantee office project director's name and contact information is collected in order to communicate with grantees. NCELA links to the OELA.ed.gov grants webpage that provides the information approved for public dissemination.

KMS
The system collects name and contact information from grantee points of contact.

Purpose: Grantees provide this information so they can log in to the system with email address and password to submit quarterly grant performance documentation, interact with peers through discussion board, and access resources that are specific to each program.

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?

New PIA
NCELA did not require a PIA during the FY19 and FY20 assessment. This is the first time that KMS has undergone an ATO review. A new PIA is created to include NCELA and KMS.

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.

NCELA and KMS are authorized by 20 U.S.C. 6301 section 3131(c)(1)(C) of the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act, and in accordance with the Government Performance Results Act of 1993, Section 4 (1115). ESEA law authorizes the systems and allows for EL information dissemination.

The Education Department General Administrative Regulations (EDGAR), 34 CFR 75.253 and 34 CFR 75.104, requires those applying for grants to comply with the Department's procedural requirements on the submission of applications. 34 CFR 75.253 and 75.104 authorizes the collection of grant point of contact information.

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?

No

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

The information is not retrieved by an identifier.

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.

NCELA and KMS
Database backups and log files are stored on Box.com for Government, a secure cloud storage solution that is compliant to standards like Box FedRAMP, ITAR, EAR, DoD SRG L4, ISO 27018, HIPAA, and IRS-1075 with a 3-year retention policy as per General Records Schedule (GRS) 3.1, item 020. Code versions are stored in Git, source control tool Electronic documents or other records are stored on the Department's internal SharePoint system with a 5-year retention policy as per the Department's Records Schedule 66. Grant-related records are retained 10 years after related grant is closed as per GRS 1.2, item 020.

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.

NCELA
Contact Us Form
https://ncela.ed.gov/contact
Full name and email address of the general public submitting a form.

Title III Office Contact Information
Grantees' point of contact information: first name, last name, grantee organizations' name, organization address, organization phone, and email address.

Constant Contact – Email List Subscription Signup Form

https://ncela.ed.gov/ncela-nexus
Email address of individuals who wish to receive a newsletter.

Grant Application
https://ncela.ed.gov/files/uploads/47/T365Z120011.pdf
Grantee project director's contact information: first name, last name,
organization, organization address, organization phone, email address.

KMS
Grantees' point of contact's first name, last name, and email address.
The KMS system utilizes ASP.NET Identity for User Management, including
Authentication and Authorization. ASP.NET Identity is a proven software library
provided by Microsoft. This framework manages user credentials. No passwords
are stored in the system.
Password hashes are stored and encrypted with a Salt as per OWASP specifications.
Password hashes are a one-way encryption scheme and cannot be reversed.

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

Yes

NCELA
Contact Us Form
The current contact form requires the submitter to provide first name, last name, and
email address. This is the minimum contact information needed to respond to respond to
the contact request.

Title III Office Contact Information
The information is publicly available on each of the states' State Education Agency
website. State's provide this information; it is posted on the NCELA website for easy
access should the user want to reach out to the SEA's.

Constant Contact – Email List Subscription Signup Form
Only an email address is required to subscribe to the email-based newsletter system.
First, last name, are optional/voluntary.

Grant Application

Yes, the information is collected through the grantee applications submitted during each grant competition as required by EDGAR 34 CFR 75.253 and34 CFR 75.104. All of the information is vetted and approved for public consumption and posted on the OELA.ed.gov website. https://www2.ed.gov/about/offices/list/oela/programs.html

KMS

A grantee's first name, last name, and email address are the minimum information required to submit grant performance documentation, interact with peers through discussion board, and access resources.

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

NCELA
Contact Us Form
https://ncela.ed.gov/contact
Source: Individual who wishes to contact OELA.

Title III Office Contact Information
The information is publicly available on each of the states' State Education Agency website.
https://ncela.ed.gov/t3sis/Alabama.php
Source: Each of the states' State Education Agency website provides basic contact information for user to submit inquiries. .

Constant Contact – Email List Subscription Signup Form
https://ncela.ed.gov/ncela-nexus
Source: Individual who wishes to be sent a newsletter.

Grant Application –
The information is collected per 34 CFR 75.253 and34 CFR 75.104 in the Grant Application documents.
https://ncela.ed.gov/files/uploads/47/T365Z120011.pdf
Source: Publicly available Grant Application documents.

KMS
https://kms.manhattanstrategy.com/grantadmin
Source: Grantee point of contact.

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

NCELA

Contact Us Form

https://ncela.ed.gov/contact

Collection Method: This information is collected via an online form on a webpage.

Title III Office Contact Information

https://ncela.ed.gov/t3sis/Alabama.php

Collection Method: The Department collects the state data through the CSPR). CSPR data is self-reported performance data from each of the SEAs. The SEA contact information is provided on the SEA's public-facing website.

Constant Contact – Email List Subscription Signup Form

https://ncela.ed.gov/ncela-nexus

Collection Method: Embedded form provided by Constant Contact and visible on the NCELA website.

Grant Application

https://ncela.ed.gov/files/uploads/47/T365Z120011.pdf

Collection Method: The Department collects the data through the CSPR). CSPR data is self-reported performance data from each of the SEAs.

KMS

https://kms.manhattanstrategy.com/grantadmin

Collection Method: This information is collected from an online form on a webpage. The information is collected through the grantee applications submitted during each grant competition. All of the information is vetted and approved for public consumption and posted on the OELA.ed.gov website:

https://www2.ed.gov/about/offices/list/oela/programs.html

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?

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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.

NCELA

Contact Us Form

No validation is necessary for this information, as it is only an email contact form. The individual provides the information themselves. If a person requests help and does not get it because they provided incorrect information, they can resubmit a form.

Title III Office Contact Information

This information is publicly available, the SEA's are responsible for updating their information. We do not provide notice because we do not collect the information. The information is approved for public consumption and posted on the OESE.ed.gov website: https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/english-language-acquisition-state-grants/

Constant Contact – Email List Subscription Signup Form

Users are able to enter any first name, last name, and email address when signing up for the email subscriber list. The individual provides the information themselves. If a person requests a newsletter and does not get it because they provided incorrect information, they can resubmit request it again with the correct information.

Grant Application

The information is collected through the grantee applications submitted during each grant competition. Grantees are responsible for updating any contact information through G5 on annual basis. The information is vetted and approved for public consumption and posted on the OELA.ed.gov website: https://www2.ed.gov/about/offices/list/oela/programs.html

KMS

The information is collected through the grantee applications submitted during each grant competition. All the information is vetted and approved for public consumption and posted on the OELA.ed.gov website: https://www2.ed.gov/about/offices/list/oela/programs.html

Use

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

NCELA

Contact Us Form

This form allows OELA to provide assistance to website users via email.

Title III Office Contact Information

Contact information is provided to the user for ease of access should they need to contact a state's Title III Office.

Constant Contact – Email List Subscription Signup Form
This form allows OELA to disseminate information via email newsletter to keep the field informed of NCELA information, news, and announcements.

Grant Applications
A project director's organization contact information is collected and displayed, per EDGAR 34 CFR 75.253 and34 CFR 75.104. The information is used to communicate with the grantees.

KMS
A grantee's first name, last name, and email address are required to create accounts and log in to submit grant quarterly performance documentation, interact with peers through discussion board, and access resources specific to each program.

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
> Click here to enter text.

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.

No

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

☑ N/A

Click here to enter text.

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

☑ N/A

Click here to enter text.

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.

   NCELA
   Contact Us Form
   The website has a Privacy Policy available from any page on the website.
   https://ncela.ed.gov/ncela-privacy-policy

   Related section of privacy policy:

   Information Collected from Interactive Forms
   On some of our web pages we offer interactive forms that let you voluntarily submit personal information (such as your e-mail address, name, or organization). We will use all submitted information only for the purpose stated on the form (e.g. to collect your information in order to send publications you request). The information is only made available to NCELA staff or as required by law.

   Title III Office Contact Information
   This information is publicly available, the SEAs are responsible for updating their information. We do not provide notice because we do not collect the information.

   Constant Contact – Email List Subscription Signup Form
   The embedded sign-up form contains a notice of collection, shown below:
   > By submitting this form, you are consenting to receive NCELA announcements, news, and resources from: National Clearinghouse for English Language Acquisition (NCELA), 4340 East-West Highway, Suite 1100, Bethesda, MD, 20814, US, http://ncela.ed.gov. You can revoke your consent to receive emails at any time by using the SafeUnsubscribe® link, found at the bottom of every email. Emails are serviced by Constant Contact. Our Privacy Policy.

Grant Application

Grantees are responsible for updating any contact information through G5 on annual basis. Notice is provided to grantees in G5 @ www.G5.ed.gov.
KMS

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

NCELA Website: https://ncela.ed.gov/ncela-privacy-policy
Constant Contact: https://www.constantcontact.com/legal/privacy-notice
KMS: https://ncela.ed.gov/ncela-privacy-policy

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?

NCELA
Contact Us Form
Users use the contact form to contact project staff with questions. The users enter their name and email address if they need an answer to their question. Users fill this information on their own.

Title III Office Contact Information
We do not have any control over consent, that under the domain of the SEA's.

Constant Contact – Email List Subscription Signup Form
Users may use the "unsubscribe" feature within Constant Contact or email the NCELA help desk to be removed from the email subscribers list.

Grant Application
Grantees provide consent at the point of grant application submission in the G5 system. This information is authorized per EDGAR 34 CFR 75.253 and34 CFR 75.104.

KMS
Grantees are required by EDGAR 34 CFR 75.253 and34 CFR 75.104, to submit information as part of the grant monitoring process. Grantees can update their contact information from the KMS website.

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.

No

5.2. What PII will be shared and with whom?
☑ N/A
Click here to enter text.

5.3. What is the purpose for sharing the specified PII with the specified internal organizations?
☑ N/A
Click here to enter text.

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.

No

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
Click here to enter text.

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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.

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

☑ N/A

| Click here to enter text. |

5.7. Is the sharing with the external entities authorized?

☑ N/A

| Click here to select. |

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

☑ N/A

| Click here to select. |

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

☑ N/A

| Click here to enter text. |

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

| Click here to select. |

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

☑ N/A

| Click here to select. |

6. **Redress**
   6.1. What are the procedures that allow individuals to access their own information?
   NCELA
   Contact Us Form
   Users will not have access to their own information. This information is not required to be updated. It's a one-time submission of a form that sends an email to project staff.

   Title III Office Contact Information

This information is publicly available and can be accessed on the SEA's public-facing website.

Constant Contact – Email List Subscription Signup Form
Email list subscribers can access and update their profile information by clicking the "update profile" link in the emails received through their subscription.

Grant Application
Grant application information is available to the grantees through the G5 system and it is also publicly available.

KMS
Grantees can view and update their contact information from within the profile page of the KMS.

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

NCELA
Contact Us Form
This information is not required to be updated. It's a one-time submission of a form that sends an email to project staff.

Title III Office Contact Information
This information is publicly available; however SEA's are responsible for updating their own contact information.

Constant Contact – Email List Subscription Signup Form
Email list subscribers can update their profile information by clicking the "Update profile" link in the emails received through their subscription.

Grant Application
The application is static, however if point of contact updates were required, a grantee would need to update the contact information via G5 and then contact their OELA program officer to notify them of the update.

KMS

Grantees can update their profile information from with the KMS website at any time, after logging in with their email address and password.

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

NCELA
Contact Us Form
This information is not required to be updated. It's a one-time submission of a form that sends an email to project staff and is not stored.

Title III Office Contact Information
The SEA's are responsible for updating their contact information. We do not notify an SEA.

Constant Contact – Email List Subscription Signup Form
All emails sent via Constant Contact have a footer that includes an unsubscribe and update profile link.

Grant Application
Grantees are responsible for updating the contact information via G5 on an annual basis.

KMS
Authenticated grantees have access to their profile page from within the KMS website and can update the information on a quarterly basis when submitting their quarterly progress reports.

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?

Yes

7.3. Under [NIST FIPS Pub. 199](#), what is the security categorization of the system: **Low, Moderate, or High?**

☐ N/A

Low

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

NCELA

Information collected on the NCELA website is accessible only to authorized users. Physical security of electronic data will be maintained in a secured data center, access to which is controlled by multiple access controls. NCELA has technical and administrative controls in place that are compliant with the Federal Information Security Modernization Act (FISMA) and with National Institute of Standards and Technology (NIST) standards. NCELA also operates under an approved Authorization to Operate.

When users select a link to go to Constant Contact, the Department provides them with notice that they are leaving the ED environment and are going to the Constant Contact environment. That environment has strong security, a description of which can be found at the Constant Contact webpage.

As the system is housed on a virtual server and is a public-facing website, all usage and user access are based on the least privilege concept and practices. Login access to system servers can only be performed from the NCELA internal network. Permitted remote access to the NCELA server is regulated by Amazon Web Services Security Groups based on specific IP Addresses.

For the Contact Us form, Emails are sent to a shared mailbox controlled the System Administrator. The staff is responsible for responding to the emails to provide assistance and have access to the information for that purpose. PII is only accessible by select staff who have been granted access to the Constant Contact account and contact us, and only staff who require access to the information are granted access.

KMS

Information collected on the KMS website is accessible only to authorized users. Physical security of electronic data will be maintained in a secured data center, access to which is controlled by multiple access controls. NCELA has technical and administrative controls in place that are compliant with the Federal Information Security Modernization Act (FISMA) and with National Institute of Standards and Technology (NIST) standards. NCELA also operates under an approved Authorization to Operate.

Access to the KMS website requires authentication (username and password). Information is transmitted using TLS 1.2.
The KMS system utilizes ASP.NET Identity for User Management, including Authentication and Authorization. ASP.NET Identity is a proven software library provided by Microsoft. This framework manages user credentials. No passwords are stored in the system."
"Password hashes are stored and encrypted with a Salt as per OWASP specifications. Password hashes are a one-way encryption scheme and cannot be reversed.

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 following is applicable to all collections under NCELA and KMS:

PII is regularly reviewed to determine whether the PII is still relevant. If PII is no longer relevant and necessary, then PII will be properly destroyed. The destruction or disposal of PII will be conducted in accordance with any litigation holds and the Federal Records Act and records control schedules approved by the National Archives and Records Administration (NARA).

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 following is applicable to all collections under NCELA and KMS:

OELA has standard operating procedures and protocols in place to safeguard grantee information. In addition, for grantee monitoring processes, OELA follows the guidelines provided in the Discretionary Handbook.

All staff that have access to PII are required to complete the "User Agreement for System Access" form that requires users to access and use the NCELA system using good security and privacy practices.

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?

This PIA details the privacy controls and safeguards implemented for this system in order to mitigate privacy risk. These controls and safeguards work to protect the data from privacy threats and mitigate the risks to the data.

One privacy risk associated with this system is unauthorized access, use, or disclosure of PII pertaining to the users. These data breaches involving PII can be hazardous to individuals because they can result in identity theft or financial fraud.

The risks are mitigated by the above-mentioned controls and safeguards, limiting access to only those with a legitimate need to know, and working closely with the security and privacy staff at the Department. The system also collects only the minimum information necessary to achieve the purpose of the system, and the information is collected, processed, or stored by the system is either voluntarily supplied by the user and is low risk information, or already publicly available information.

Additionally, OELA has developed and abide by a set of policies and control implementations, pursuant to NIST 800-53 Rev 4, to protect the information system and the data collected, stored, and processed in the system.