



Privacy Impact Assessment

For

National Blue Ribbon Schools Program (BRSP)

Date:

December 8, 2015

Point of Contact, System Owner, and Author:

Aba S. Kumi

aba.kumi@ed.gov

Office of Communication and Outreach (OCO)

U.S. Department of Education



1. System Information.

Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions. Indicate whether the system is new or existing and whether or not the PIA is new or being updated from a previous version; specify whether the system is “agency” or “contractor.”

The National Blue Ribbon Schools Program (BRSP) is an existing, operational, contractor program which maintains a secure data collection and management system consisting of a relational database-driven website. The system performs discrete and integrated program tasks that include general application procedures used to document exemplary schools. This will be a new PIA. This PIA is being updated from a previous version.

2. Legal Authority.

Cite the legal authority to collect and use this data. What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

The United States Department of Education is responsible for administering the Blue Ribbon Schools Program, which is authorized by Public Law 107-110 (January 8, 2002), Part D -- Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5).

Link: <http://www2.ed.gov/programs/nclbbrs/legislation.html>

3. Characterization of the Information.

What elements of personally identifiable information (PII) are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)? What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

The information collected by the system does not include personal identifiers such as date of birth, social security numbers, etc. The information is collected via a website, online form. The sources of the information are publicly available information for a school provided to the Program from State Education Agencies. The information is collected via a database driven website. The information stored in the online system are: the name of the nominated school, the school’s mailing address, telephone number, website, the school principal’s name and email address, the name of the school district, the district’s telephone number, the district superintendent’s name and email address and name of the school board chairperson. The information within the system is never retrieved by personal identifier. The information is not used to link or cross-reference multiple databases.

4. Why is the information collected?

How is this information necessary to the mission of the program, or contributes to a necessary agency activity? Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.



The information collected by the National Blue Ribbon Schools Program is needed to identify, evaluate, honor and recognize public and private elementary, middle, and high schools where students either achieve very high learning standards or are making notable improvements in closing the achievement gap. These schools serve as models for other schools throughout the nation, and details of their achievements are shared on the Department's website. The data and information collected in the National Blue Ribbon Schools Program application is knowledge already accessible in the public domain through openly available records. Ten contract staff members assigned to the National Blue Ribbon Schools contract have access to the information in the system. The database driven website is solely operated by RMC Research Corporation, who is required to adhere to all regulatory and privacy safeguards specified in the National Blue Ribbon Schools' contract terms and conditions. The website's contractor has documented safeguards in conducting the information collection process to protect access to PII and is required to withhold disclosure of information about the system and content, without express written permission issued by the Contracting Officer.

5. Social Security Number (SSN).

If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures. Also specify any alternatives that you considered, and why the alternative was not selected. If system collects SSN, the PIA will require a signature by the Assistant Secretary or designee. If no SSN is collected, no signature is required.

The National Blue Ribbon Schools Program (BRSP) does not collect, store, or maintain social security numbers.

6. Uses of the Information.

What is the intended use of the information? How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.

The information collected by the National Blue Ribbon Schools Program is used to identify, evaluate, honor, and recognize public and private elementary, middle, and high schools where students either achieve very high learning standards or are making notable improvements in closing the achievement gap. These schools serve as models for other schools throughout the nation, and details of their achievements are shared on the Department's website. The Secretary also uses the applications to identify educational practices that have been successful in closing the achievement gap. In addition, the information collected is generally publicly available via internet searches, and is already available in the public domain through openly available records or other Federal agency databases <http://nces.ed.gov/ccd>.

7. Internal Sharing and Disclosure.

With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared?



Information about recognized schools is shared with the following offices: Office of the Secretary, Office of Communications and Outreach (Press Office), Office for Civil Rights, Office of Special Education and Rehabilitative Services, Office of Legislative and Congressional Affairs.

8. External Sharing and Disclosure.

With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)? What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement with another agency?

The information is shared externally with the Department of Justice in an effort to ensure that a school eligible for recognition does not have a pending suit alleging that the school or school district as a whole has violated one or more of the civil rights statutes or the Constitution's equal protection clause. Also, the information is shared with Members of the U. S. House of Representatives and Senate for purposes of notification regarding recognized schools in their districts and state.

9. Notice.

Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)? What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?

A privacy notice is posted at <http://www2.ed.gov/notices/privacy/index.html>.

10. Web Addresses.

List the web addresses (known or planned) that have a Privacy Notice.

www.ed.gov/nationalblueribbonschools.

11. Security.

What administrative, technical, and physical security safeguards are in place to protect the PII? Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?

The system is being offered the same protections as provided under the Educate contract via a Memorandum of Understanding that is being drafted by the ISSO. Further, permissions are managed by the system owner and Information System Security Officer (ISSO). The database is located on the contractor site; unless someone is granted access to the system where the database is housed, the information cannot be accessed. Current access has been granted to specific members of the National Blue Ribbon School contract staff who managing the data and information for the Program.

Safeguards to protect the PII gathered include the following:



(a) The contractor is required to adhere to rules of behavior and execute contract documents that require adherence to federal laws on the protection of privacy and securing the confidentiality of all web work performed on behalf of the National Blue Ribbon Schools Program

(b) All nineteen employees are required to undertake annual required training on Privacy Laws.

The contractor conducts regular monitoring and auditing of the system to include scans and audit logging that sends emails using an event driven' notification system as well as digests of any detection and protection anomaly. Firewalls such as the Fort iGATE IDS and UTM Platform (<http://www.fortinet.com/products/fortigate/index.html>), Intrusion Detection Systems (IDS) and Intrusion Preventions Systems (IPS) such as Fail2Ban (www.fail2ban.org) framework are in place and continually monitored.

The National Blue Ribbon Schools Program is in the process of completing a Certification and Accreditation of the system to comply with the OMB and ED guidelines as detailed via FEDRAMP requirements. The contractor is working with the Department's Information Assurance Office to conduct this work. RMC Research, the contractor, has contracted with an independent third party assessor (<http://tdginc-gsa.com/>), who conducted a review and audit of the "SYSTEM" in March of 2015 using the NIST SP 800-53 REV 4 (http://csrc.nist.gov/publications/nistpubs/800-53-rev4/sp800-53r4_summary.pdf) guidance to secure the ATO from the Department.

12. Privacy Act System of Records.

Is the information within the system retrieved by personal identifier? If so, is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a? Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?

A system of record notice is not needed because the information collected is not retrieved by name or personal identifier. Therefore, a system of record as defined by the Privacy Act is not being created and the reporting requirements of OMB Circular A-130 do not apply.

13. Records Retention and Disposition.

Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected? If yes – provide records schedule number:

The Schedule Locator is 102, Title: Recognition Programs Files. The Office of Communication and Outreach (OCO) adheres to the Department's and NARA guidelines on records management. These are permanent records, cut off annually upon close of program awards cycle, and transferred to NARA after cutoff, per the disposition authority of ED 102 N1-441-09-6.



Privacy Impact Assessment