



Privacy Impact Assessment

For

National Longitudinal Transition Study 2012

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1. System Information. Describe the system - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

The system name is “National Longitudinal Transition Study 2012” or “NLTS 2012”. The system will contain records on approximately 15,000 students and their parents, and 15,000 teachers and 2,000 principals from 500 districts, which will be used to conduct a study to describe the characteristics of, receipt of services by, and outcomes of transition-age students. The NLTS 2012 was commissioned by the National Center for Education Evaluation and Regional Assistance at the Department’s Institute of Education Sciences (IES) as part of the congressionally mandated national assessment of Individuals with Disability Education Act (IDEA).

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 study is authorized under Individuals with Disability Education Act (IDEA), Title I, Part D, Subpart 2, Section 664. The 2004 authorization of IDEA was signed into law (P.L. 108-446) on December 3, 2004. Section 664(e) of IDEA 2004 authorizes studies and evaluations of transitional services and results, including postsecondary placement and employment, for individuals with disabilities identified for services under IDEA. Section 664(a) of IDEA 2004 instructs the Secretary of Education to delegate responsibility for such studies to the Institute of Education Sciences (IES).

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 system of records will include, but will not be limited to information about the students who agree to participate in the study, specifically name, birth date, and contact information, which will be obtained from the student or parent via phone interviews. The system of records will also include student demographic information such as race, ethnicity, gender, age, and educational background; information on attendance and disciplinary incidences; information on employment history and college attended; scores on reading and mathematics achievement tests; and administrative data on the students including school transcripts. The system of records will also include information about the parents, teachers, and principals, of participating students, including name and contact information; demographic information such as race and ethnicity; and teaching experience.

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.

This information is being collected for statistical purposes. The purpose of the information collection under this study is to provide information on the characteristics of youth receiving special education services under IDEA, their courses of study, the transition and other



services and accommodations they receive, the barriers and challenges they face, and their postsecondary education and employment outcomes. More than 2.7 million youth with disabilities between the ages of 13 and 21 receive special education services funded under Part B of IDEA. In addition to the challenges all youth encounter as they leave high school and become young adults, youth with disabilities sometimes face barriers related to health, social isolation, service needs, and access to supports. This collection has been planned to help to address a national goal of significantly increasing the number of students entering and completing postsecondary education.

A major challenge in developing policies and improving practice to assist transition-age youth is securing reliable and complete information on their diverse needs, school experiences, and postsecondary paths. NLTS 2012 is the third in a series of longitudinal studies of students with disabilities, conducted approximately a decade apart. The study will not only be able to provide information about a current cohort of transition-age students receiving special education, but also, for the first time, identical information for students with Section 504 plans, a growing part of the youth population, and for students without disabilities or a 504 plan. Finally, the NLTS 2012 was designed to replicate many questions from the earlier studies of students with disabilities. These features allow the study to serve as a benchmark for assessing national progress in meeting the academic and other needs of all students, and a base of information for better understanding the pathways youth follow as they move from high school to young adulthood.

- 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.***

We currently plan to collect SSNs in Wave 2 of the surveys. Data on students' post-high school employment and earnings are critical to the objectives for the study. Self-reported information (e.g., through surveys) has generally been found to be unreliable and difficult to obtain after students leave high school and, in many cases, their parents homes. Past longitudinal surveys have had very low response rates to long-term follow up, in some cases making data on earnings unusable.

We are beginning to develop an agreement with the Social Security Administration (SSA) in which they will tabulate employment and earnings information for the NLTS 2012 sample using their Master Earnings File. This method will place low burden on students and low costs on the government. Historically, SSN has been necessary to match with SSA's Earnings File. While we have discussed with SSA the possibility of conducting a test of the effectiveness of matching based only on student name, date of birth, and location, such a test has not yet been conducted. If it proves to be successful, we will not collect SSN under Wave 2 of the surveys.

- 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.**



NLTS 2012 will provide up-to-date information on the characteristics, transition experiences, and transition outcomes of youth with disabilities that will help policymakers, educators, and parents improve policy and education practice to support successful outcomes. It will describe the secondary and postsecondary trajectories of youth with IEPs and how they differ from those of youth with Section 504 plans and youth with no identified disability. The study will inform policy, practice, and future research by examining the needs of various subgroups of youth with disabilities; how those needs are being addressed by schools and other organizations; barriers perceived by youth, parents, and school staff; and how youth outcomes are related to specific competencies, school experiences, and the services and supports youth receive. The study will also examine the extent to which school experiences and outcomes are changing in ways consistent with the goals of IDEA. In addition to supporting the specific analyses planned as part of NLTS 2012 Phase I, the data will be made available to other researchers and practitioners through well-documented restricted use files.

The system will include new data collected through surveys, administrative school records obtained from state and local education agencies (districts), and publicly available information on school districts and schools maintained by the National Center for Education Statistics (NCES). Information on earnings obtained from SSA will not be in the system of records; under SSA's rules and procedures, matching and data tabulations will be performed by their analysts and provided to ED only in aggregate form.

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?

IES will share name and date of birth of the student with Rehabilitation Services Administration (RSA) in order to collect aggregate information about the vocational rehabilitation services students received once they left school and with FSA in order to obtain financial aid data.

The Department may disclose information contained in a record in this system of records under the routine uses listed in this system of records without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Any disclosure of individually identifiable information from a record in this system must comply with the requirements of section 183 of the Education Sciences Reform Act (ESRA) (20 U.S.C. 9573), which provides confidentiality standards that apply to all collection, reporting, and publication of data by IES.

(1) Research Disclosure. The Director of IES may license de-identified confidential information from this system of records to qualified external researchers solely for the purpose of carrying out specific research that is compatible with the purpose(s) of this system of records. The researcher shall be required to maintain the confidentiality of the licensed data and to use it only for statistical purposes. All licensing shall be accomplished pursuant to the National Center for Education Statistics Licensing Program, described in the following website: <http://nces.ed.gov/statprog/instruct.asp>.

(2) Contract Disclosure. If the Department contracts with an entity to perform any function that requires disclosing records in this system to the contractor's employees, the Department may disclose the records to those employees who have received the appropriate level of



security clearance from the Department. Before entering into such a contract, the Department will require the contractor to establish and maintain the safeguards required under the Privacy Act (5 U.S.C. 552a(m)) with respect to the records in the system.

- 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?**

We are beginning to develop a Memorandum of Understanding with the Social Security Administration (SSA) for data transferring in order to collect aggregate employment and earnings information for the NLTS 2012 sample. We are discussing with SSA to conduct testing as part of this agreement of the effectiveness of matching based only on student name, date of birth, and location, to tabulate employment and earnings information for the NLTS 2012 sample using SSA's Master Earnings File. See response to question 5.

- 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?**

Participation in the study is voluntary. All participants are informed of this in writing via pre-interview letters and during the course of the interview. Participants may decline to participate at any time during the study or in any component of the study (e.g., providing SSN).

In addition, the following verbatim language will appear on the parent consent form and other applicable study-related materials:

All information gathered for the study will be kept confidential and will only be used for research purposes. The information collected about this student will be used only for statistical purposes and may not be disclosed or used, in identifiable form, for any other purpose except as required by law (Public Law 107-279, Section 183).

- 10. Web Addresses. List the web addresses (known or planned) that have a Privacy Notice.**

<http://ies.ed.gov/ncee/nlts/index.asp>

- 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?**

All physical access to the Department's site and to the sites of the Department's contractor and subcontractors, where this system of records is maintained, is controlled and monitored by security personnel. The computer system employed by the Department offers a high degree of resistance to tampering and circumvention. This security system limits data access to Department and contract staff on a need-to-know basis and controls individual users' ability to access and alter records within the system. The contractor and subcontractors will establish a similar set of procedures at their sites to ensure confidentiality of data. The



contractor and subcontractors are required to ensure that print data identifying individuals are in files physically separated from other research data and electronic files identifying individuals are separated from other electronic research data files. The contractor and subcontractors will maintain security of the complete set of all master data files and documentation. Access to individually identifying data will be strictly controlled. At each site, all print data will be kept in locked file cabinets during nonworking hours and work on hardcopy data will take place in a single room, except for data entry. Physical security of electronic data will also be maintained. Security features that protect project data include: password-protected accounts that authorize users to use the contractor's system but to access only specific network directories and network software; user rights and directory and file attributes that limit those who can use particular directories and files and determine how they can use them; and additional security features that the network administrators will establish for projects as needed. The Department's, contractor's, and subcontractors' employees who "maintain" (collect, maintain, use, or disseminate) data in this system must comply with the requirements of the Privacy Act and the confidentiality standards in section 183 of the ESRA (20 U.S.C. 9573), which provides criminal penalties for violations.

12. Privacy Act System of Records. 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?

The system is covered under the system of records notice entitled National Longitudinal Transitions Study 2012 (18-13-27), dated April 27, 2012, (77 FR 25152-25155).

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:

Records are maintained and disposed of in accordance with the Department's Records Disposition Schedules ED 068.a (NARA Job Number: N1-441-08-18).