

**Privacy Impact Assessment (PIA)**

for the

**WizeHive:
Presidential Scholars Program (PSP) Workspace**

**May. 22, 19**

**For PIA Certification Updates Only:** This PIA was reviewed on May 22, 2019 by Simone Olson certifying the information contained here is valid and up to date.

**Contact Point**

**Contact Person/Title: Simone Olson, Executive Director, Presidential Scholars Program**

**Contact Email: simone.olson@ed.gov**

**System Owner**

**Name/Title: Luis Lopez**

**Principal Office: System: Office of the Chief Information Officer (OCIO)
Information Collection: Office of Communication & Outreach (OCO)**

*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.***

# Introduction

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

The U.S. Presidential Scholars Program was established in 1964, by executive order of the President, to recognize and honor some of our nation's most distinguished graduating high school seniors. The multiple program WizeHive allows eligible candidates, who have received an invitation to apply to the U.S. Presidential Scholars Program. Eligible candidates can complete and submit their applications electronically. WIZEHIVE, which is limited to users who have been authorized and issued user ID’s and passwords by ED, is reached through the U.S. Presidential Scholars Program’s main site, <http://www.ed.gov/psp>.

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

The Presidential Scholars Program was established by Executive Order of the President (EOs 11155, 12158 and 13697) to recognize and honor some of our nation's most distinguished graduating high school students from across the country. The program collects and uses some personally identifiable information to carry out the authorizing Executive Orders, and specifically to review and determine the eligibility of candidates; implement the program’s annual recognition component; and maintain historical records on the program for the time period and in the manner specified in the Department of Education’s Records Disposition Schedule (ED/RDS, Part 5, Item 6).

* 1. Is this a new system, or one that is currently in operation?
	Currently Operating System
	2. Is this PIA new, or is it updating a previous version?
	Updated PIA
	3. Is the system operated by the agency or by a contractor?

Contractor

* + 1. If the system is operated by a contractor, does the contract or other acquisition-related documents include privacy requirements?

Yes

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

* 1. Whatspecific 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.

This information is requested in order to carry out the authorizing Executive Order of the President 11155 (1964), "Providing for the recognition of certain students as Presidential Scholars" and its amendments, Executive Orders 12158 (1979), "Awards for Special Capability in the Visual and Performing Arts and in Creative Writing" and 13697 (2015), "Awards for Special Capability in Career and Technical Education".

**SORN**

* 1. 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

		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]](#footnote-2) Please provide the SORN name, number, Federal Register citation and link, or indicate that a SORN is in progress.



The System of Records Notice was published in the Federal Register December 3, 2003 (68 FR 67781-85).

https://www.federalregister.gov/documents/2003/12/03/03-30031/privacy-act-of-1974-system-of-records

* + 1. 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.
		

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**Records Management**

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

* 1. 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.

The Records Schedule Number is 102, Title: Recognition Programs Files, Item A, Part 5. Presidential Scholar Program data stored in WIZEHIVE is considered temporary. Data that has been collected is cut off annually upon close of program awards cycle and destroyed/deleted 4 years after cutoff. Scholar applications are required to be retained for 4 years. Scholar data is removed from WIZEHIVE PSP and stored for the required time on our ED secure servers and destroyed or deleted at the appropriate time. Any scholar paper applications that are not also available electronically are stored securely for the required time. All other candidate information is deleted/destroyed at the end of the program cycle.

Permanent records, such as the list of scholar finalists, are stored in the ED SharePoint system and transferred to NARA in accordance with the ED record schedule.

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

	Yes

# Characterization and Use of Information

**Collection**

* 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 Online forms asks candidates (students) to provide: their first name, middle initial, and last name; permanent address; State of legal residence, telephone number at permanent address; mailing address and telephone number if different from permanent address; personal information including gender, age, and date of birth; e-mail address; high school name and address; name, school subject area and address of the teacher being nominated by the applicant as a Distinguished Teacher; first-choice college; information about extracurricular activities, work experience, community activities, special talents and awards; standardized test scores; school transcripts; and responses to short answer questions and one essay topic. The application content was developed by the Commission on Presidential Scholars.

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

Yes

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

The WIZEHIVE PSP system collects information from individual students, schools, Chief State School Officers, other recognition program Partner organizations and testing agencies.

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

Information is collected primarily through on-line Web-based forms using WIZEHIVE. Paper submissions are allowed for those without on-line access, and that information is transcribed into WIZEHIVE. Specifics about how information collection are as follows:

* Individual students submit application and follow-up information via WIZEHIVE (with paper as an alternate)
* Schools submit student recommendations and transcripts via WIZEHIVE (with paper as an alternate)
* Chief State School Officers and partner organizations submit nomination information via WIZEHIVE
* Testing agencies (e.g. ACT, Inc., The College Board) submit student test scores by secure electronic transmission
	1. How is the PII validated or confirmed to ensure the integrity of the information collected?[[3]](#footnote-3) Is there a frequency at which there are continuous checks to ensure the PII remains valid and accurate?

Data submitted by the Chief State School Officers, partner organizations and testing agencies is reviewed and either confirmed or corrected by the individual students completing their applications. Data submitted by school recommender is reviewed and confirmed by the school principal.

**Use**

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

This information is requested in order to carry out the authorizing Executive Order 11155 (1964) and its amendments, Executive Orders 12158 (1979) and 13697 (2015), by:

* determining the eligibility of candidates by reviewing their submitted applications in order to select the program’s semifinalists and finalists on an annual basis;
* developing and implementing the program’s annual recognition component.
	1. Is the system using PII for testing/researching new applications or information systems prior to deployment or for training employees?

	No

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

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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.*

* 1. 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

* + 1. If the above answer is **YES**, explain the purpose for its collection, and how the SSN will be used.
		

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* + 1. Specify any alternatives considered in the collection of SNNs and why the alternatives were not selected.
		

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# Notice

* 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.

The WIZEHIVE system provides notices to individuals through a Privacy Policy Statement posted on the website for candidates who apply online. Candidates are invited to apply to the U.S. Presidential Scholars Program, but they are not required to apply. If a candidate chooses to apply to the program, they are aware that the collection of PII is necessary in order for them to be considered for the award. Users are notified that registration and submission of some PII is necessary because applications cannot be submitted anonymously. The applicant also reads through a privacy statement while filling out the application. Each candidate selects for himself/herself whether or not they are willing or unwilling to be contacted by the press if the press makes an inquiry about them.

* 1. 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.
	

The WIZEHIVE privacy policy is available at the following page: www2.ed.gov/programs/psp/applicant.html. The direct link to the notice is here: <https://www2.ed.gov/programs/psp/applications/privacy.pdf>

* 1. 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?

If invited candidates do not want their PII used, they can choose not to complete the registration and application process. There is no opt-out option once a person's PII is already in the system.

* 1. 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

# Information Sharing and Disclosures

**Internal**

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

	Yes
	2. What PII will be shared and with whom?
	

Winners’ city, state, school, and contact information will be shared with the Office of the Secretary, Public Affairs, legislative offices and others when requested.

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

The information is only shared with the purpose of honoring the students chosen as Scholars each year. The Secretary sends each Scholar a personalized letter. The press office coordinates media requests for the Scholars and the legislative offices manages congressional inquiries for recognizing Scholars. Scholars are contacted individually by the program office by email if the press or congressional offices express interest in contacting them. Contact information is not shared without immediate permission.

The student gives permission in writing in the application. As a follow up whenever we are approached by a media outlet or legislative office inquiring to make contact with a Scholar, we reach out to the Scholar via email to obtain permission and let the Scholar follow up if he or she chooses with the interested party.

**External**

* 1. 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
	2. What PII will be shared and with whom? List programmatic disclosures only.[[4]](#footnote-4)
	**Note: If you are sharing Social Security Numbers externally, please specify to whom and for what purpose**.
	

Winners’ city, state, school, and contact information will be shared with the entities below.

Routine programmatic disclosures listed in the Privacy Statement include the following. Disclosures to:

* Review Committee and the Commission on Presidential Scholars;
* The general public announcing the program’s candidates, semifinalists and finalists;
* The general public of the annual U.S. Presidential Scholars Yearbook;
* Contractors for production of program recognition materials and the U.S. Presidential Scholars Yearbook;
* Contractors and college-age interns to arrange Scholar accommodations, transportation, and other services;
* National, State and local media to publicize the Scholars and respond to press inquiries about them;
* White House and Federal agencies for briefings, speechwriting, or to obtain security clearances;
* National, State and locally elected officials and their staff to notify them of candidates, semifinalists and Scholars in their States or districts, and to assist with other activities to recognize these individuals; and
* State and local education officials to notify them of candidates, semifinalists and Scholars in their States, districts, or schools.
	1. What is the purpose for sharing the PII with the specified external entities?
	

The information is used by the Department and its Contractors to perform the following functions:

* Verify eligible candidates;
* Provide technical assistance and respond to e-mail requests from system users;
* Conduct the annual selection of Scholars;
* Announce the program’s candidates, semifinalists and finalists to the general public;
* Produce program recognition materials, including medallions and the annual U.S. Presidential Scholars Yearbook;
* Host in-State recognition ceremonies for semifinalists and finalists;
* Arrange the national recognition events, including Scholar accommodations, transportation, and other services;
* Inform national, State and local media so that they may publicize Scholars and the program;
* Provide information to the White House and Federal agencies for briefings, speechwriting, or to obtain security clearances for recognition events;
* Notify national, State and locally elected officials of candidates, semifinalists and Scholars in their States or districts and assist with the recognition of these individuals; and
* Notify State and local education officials to notify them of candidates, semifinalists and Scholars in their States, districts or schools.
	1. Is the sharing with the external entities authorized?
	

Yes

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

No

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

This information is mailed or securely emailed by the Department.

* 1. Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or other type of approved sharing agreement with another agency?
	

No

* 1. Does the project place limitation on re-disclosure?
	
	No

# Redress

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

Users are provided with login credentials to access the system containing their information.

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

Users may edit most fields. If a field is not editable, the user is instructed to call or email the U.S. Presidential Scholars Program to correct the information.

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

Users are provided opportunities to edit fields in the system and are instructed to call or email the U.S. Presidential Scholars Program to correct information that can only be edited by an administrator.

# Safeguards*If you are unsure which safeguards will apply, please consult with your* [*ISSO*](https://share.ed.gov/teams/OCIO/IA/SEA/SEA_Collab/SitePages/ED%20ISSOs.aspx)*.*

* 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

* 1. Is an Authority to Operate (ATO) required?

	Yes
	2. Under [NIST FIPS Pub. 199](https://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.199.pdf), what is the security categorization of the system: **Low, Moderate, or High?**
	Moderate
	3. What administrative, technical, and physical safeguards are in place to protect the information?

The system employs a full suite of administrative, technical, and physical safeguards to protect information based on federal requirements (NIST SP 800-53) and commercial best practices. The system has been evaluated against the SP 800-53 Moderate profile with FedRAMP cloud enhancements and has no open security findings. Safeguards include password-based and two-factor authentication, role-based access control, data encryption, and physical data center security.

* 1. 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

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

Yes

* 1. 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 Information Assurance Services IAS team conducts regular assessments on WIZEHIVE to determine if it meets the requirements set out by the Department and if it should be authorized to operate. During this assessment, each control is reviewed for completeness and Plans of Actions and Milestones POAMs created that should be addressed if the team found discrepancies. In addition, monthly vulnerability scans are also executed by the EDSOC team.

# Auditing and Accountability

* 1. How does the system owner assess and ensure that the PII is used in accordance with stated practices in this PIA?

The PSP system owner ensures that the PII is used in accordance with the stated practices in this PIA through several methods. The first method is by completing the Department of Education Risk Management Framework process in order to receive an Authority to Operate (ATO). When going through the ATO process the system owner establishes monitoring processes to ensure that information is used in accordance with approved practices. The second method is by ensuring that ED OCO personnel (staff and contractors), system and processes comply with National Institute of Standards and Technology (NIST) 800-53 controls for a Moderate Application which include administrative, technical and physical controls.

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

Yes

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

The primary risk associated with the PSP information collection is the unintentional disclosure of applicant grade point average and standardized test score data. The associated impact is low, because such information is routinely shared by the applicants themselves.

A secondary risk is the unintentional disclosure of applicant name and contact information. The associated impact is low, because applicants are unlikely to be embarrassed by disclosure of being nominated for this prestigious program.

These and other risks are mitigated by the implementation of appropriate security controls as described in the system security plan.

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](https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/OMB/circulars/a130/a130revised.pdf) [↑](#footnote-ref-1)
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> [↑](#footnote-ref-2)
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. [↑](#footnote-ref-3)
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. [↑](#footnote-ref-4)