

Privacy Impact Assessment for The U.S. Department of Education "I Am What I Learn" Video Contest

September 4, 2009

Point of Contact: Liz Utrup 202 260 2299

Elizabeth.utrup@ed.gov

System Owner: Office of Communications and Outreach

> Author: Liz Utrup Elizabeth.utrup@ed.gov

## U.S. Department of Education Office of Communications and Outreach

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

The "I Am What I Learn" video contest is an online Back-to-School contest where active students 13 yrs or older will create videos describing the academic goals they will set for themselves and why their education is important to achieving their dreams. Potential contestants will visit <u>www.Ed.gov/IAmWhatILearn</u> to read the rules, FAQs and upload their videos.

Each potential contestant will upload their videos through their personal YouTube account in order to become a potential finalist and subsequent winner. Video submissions will be reviewed by a panel of judges who will determine 10 finalists. The Department will notify finalists via a YouTube message requesting that the finalist contact the Department by email or phone to confirm their participation and qualification.

The 10 finalists' videos will be showcased on the Department's YouTube channel. YouTube viewers will vote on their favorites. The three videos with the most votes by October 31, 2009 will be announced as the winners of the contest and each will receive a \$1000 prize.

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

The contest will require the ten participants who are selected as finalists to voluntarily contact the Department. In contacting the Department, the participants will share their first name, last name, phone number, email, grade, school, city, and state as well as either a parental consent and release form, if they are under the age of 18, or a release form if they are 18 or older.

The Department will review and document information from these finalists to verify that they qualify as finalists and subsequent winners based on the contests rules and guidelines. The Department has authority to conduct this contest under 20 U.S.C. 3402(1) & (3) and 3412(e)(2).

3. <u>Characterization of the Information</u>. What elements of 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?

Participants who receive notification to become a finalist will voluntarily contact the Department to confirm their interest in participating in the contest. They will then share their first name, last name, phone number, email, grade, school, city and state as well as either a parental consent and release form, if they are under the age of 18, or a release form if they are 18 or over. The Department will review and document information from these participants to verify their eligibility based on the contests rules and guidelines.

4. <u>Why is the information collected?</u> How is this information necessary to the mission of the program, or contributes to a necessary agency activity. Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

The Department must collect documentation that finalists have met contest requirements in order to confirm their eligibility and to award prize money.

There are no anticipated privacy risks associated with the contest. Participants will voluntarily contact the Department to confirm their participation in the contest as a finalist and subsequent winner.

5. <u>Social Security Numbers -</u> 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.

Social Security numbers will not be collected.

6. <u>Uses of the Information</u>. 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? If the system uses commercial information, publicly available information, or information from other Federal agency databases, explain how it is used.

The Department must receive voluntarily documentation from finalists to confirm their eligibility, meaning their information is consistent with contest requirements.

The information will only be used internally. The finalists' information will be documented and retained in a physical file.

The physical file will be stored in a locked cabinet within the U.S. Department of Education building, where armed security guards patrol the perimeter of the Department's building 24 hours a day, seven days a week.

7. <u>Internal Sharing and Disclosure</u>. With which internal ED organizations will the information be shared? What information is shared? For what purpose is the information shared? Describe the risks to privacy for internal sharing and disclosure and describe how the risks were mitigated.

There will be no internal sharing of information.

8. <u>External Sharing and Disclosure</u>. 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? Describe the risks to privacy from external sharing and disclosure and describe how the risks are mitigated.

No external entity will share the information for the duration of the contest, with the exception of the awards process. When the contest winners have been selected, the Department will share the names, cities and states of residence and schools of the winners with the public through an online video announcement.

9. <u>Notice</u>. 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?

No individual will be required to provide personal information to the Department, unless the individual is selected as a contest finalist. If an individual selected as a finalist does not provide the personal information required by the contest rules and consent to disclosure of PII as described in answer to question 8, the individual will not be considered as a finalist and potential winner in the contest.

10. <u>Security.</u> 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 finalists' information will be documented and retained in a physical file.

The physical file will be stored in a locked cabinet within the U.S. Department of Education building, where armed security guards patrol the perimeter of the Department's building 24 hours a day, seven days a week.

11. <u>Privacy Act System of Records.</u> 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?

There will not be a system of records created for this contest.

12. <u>Records Retention and Disposition</u>. 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:

These records are currently unscheduled. Applicable records retention schedules will be identified and/or developed, and submitted to the NARA if required. Until the records retention determinations are finalized, no records will be destroyed.

## Certifying Officials Signatures.

System Owner

Program Office Computer Security Officer

For systems that collect, maintain and or transfer SSNs:

Senior Program Official