



USAID
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Secondary Analysis for Results Tracking Database (SART) Privacy Impact Assessment (PIA)

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

Office of the Chief Information Officer (M/CIO)
Information Assurance Division
USAID/E3/ED/Secondary Analysis for Results Tracking Database
Approved Date: September 21, 2016

Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

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1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

2 Information

2.1 Program and System Information

2.1.1 Describe the PROGRAM and its PURPOSE.

Optimal Solutions Group LLC (Optimal) was awarded the Secondary Analysis for Results Tracking (SART) contract (AID-OAA-C-12-00069), which includes the task of facilitating the tracking of secondary data for Goals 1 and 3 of the USAID Education Strategy. For this purpose, Optimal will develop a data system referred to as “SART Ed” that will serve as a central repository for data related to Goals 1 and 3 of USAID’s education strategy.

The SART Ed system serves a crucial role in USAID/E3/ED in fulfilling its reporting requirements to the Administrator and to Congress. Data contained in the system will be used to measure improvements at an aggregated versus individual level in learning or school participation that are brought about through USAID-funded programming.

2.1.2 Describe the SYSTEM and its PURPOSE.

SART Ed will serve as a central repository of datasets that are to be collected and de-identified by implementing organizations under other USAID mechanisms. In collaboration with Optimal, the USAID education office will ensure that datasets are cleared for release in a manner that conforms to recommended practices.

Information stored in the data system will include 1) data related to the measurement of pupil performance on early grade reading assessments; and 2) data on attendance trends aggregated to the level of the school or higher. In all cases, data will be properly anonymized by primary data collectors before they are transmitted to Optimal, resulting in no PII being stored in the SART system. The data will include information such as children’s age, sex, grade of primary school education, and performance on various measures of learning. Children’s data will be associated with broad information about schools such as the country and state (outside of the U.S.) where the school is located.

2.1.3 What is the SYSTEM STATUS?

- New System Development or Procurement
 - Pilot Project for New System Development or Procurement
 - Existing System Being Updated
 - Existing Information Collection Form or Survey
- OMB Control Number:

2.1.3 What is the SYSTEM STATUS?

- New Information Collection Form or Survey
- Request for Dataset to be Published on an External Website
- Other:

2.1.4 What types of INFORMATION FORMATS are involved with the program?

- Physical only
- Electronic only
- Physical and electronic combined

2.1.5 Does your program participate in PUBLIC ENGAGEMENT?

- No.
- Yes:
 - Information Collection Forms or Surveys
 - Third Party Web Site or Application
 - Collaboration Tool

2.1.6 What type of system and/or TECHNOLOGY is involved?

- Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
- Network
- Database
- Software
- Hardware
- Mobile Application or Platform
- Mobile Device Hardware (cameras, microphones, etc.)
- Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
- Wireless Network
- Social Media
- Web Site or Application Used for Collaboration with the Public
- Advertising Platform
- Website or Webserver
- Web Application

2.1.6 What type of system and/or TECHNOLOGY is involved?
<input type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input checked="" type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input checked="" type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input checked="" type="checkbox"/> Other: COTS application (i.e., Revelo, JIRA) and Open Source software (i.e., D3 for BI dashboards)
<input type="checkbox"/> None

2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input type="checkbox"/> USAID employees and personal services contractors
<input type="checkbox"/> Employees of USAID contractors and/or services providers
<input type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input checked="" type="checkbox"/> Others: Non-U.S. Citizen children participating in USAID-funded education programs located outside of the United States.
<input type="checkbox"/> None

2.2 Information Collection, Use, Maintenance, and Dissemination

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Social Security Number or Truncated SSN
<input type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input type="checkbox"/> Home Address
<input type="checkbox"/> Home Phone Number
<input type="checkbox"/> Personal Cell Phone Number
<input type="checkbox"/> Personal E-Mail Address
<input type="checkbox"/> Work Phone Number
<input type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input type="checkbox"/> Employment or Salary Record
<input type="checkbox"/> Medical Record
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input checked="" type="checkbox"/> Education Record: Only the grade the child is in is collected and, in some cases, the type of school (e.g., government school, private school, etc.) is collected as well.
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input checked="" type="checkbox"/> Sex or Gender
<input checked="" type="checkbox"/> Age

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo)
<input type="checkbox"/> Sexual Orientation
<input type="checkbox"/> Marital status or Family Information
<input type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input type="checkbox"/> Citizenship
<input checked="" type="checkbox"/> Other: Data may also include: month and year of birth (but not full DOB) and broad location information for a school, such as its state and urban or rural location.
<input checked="" type="checkbox"/> No PII is collected, used, maintained, or disseminated

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input checked="" type="checkbox"/> Form Data
<input checked="" type="checkbox"/> User Names
<input checked="" type="checkbox"/> Passwords
<input type="checkbox"/> Unique Device Identifier
<input type="checkbox"/> Location or GPS Data
<input type="checkbox"/> Camera Controls (photo, video, videoconference)
<input type="checkbox"/> Microphone Controls
<input type="checkbox"/> Other Hardware or Software Controls
<input type="checkbox"/> Photo Data
<input type="checkbox"/> Audio or Sound Data
<input type="checkbox"/> Other Device Sensor Controls or Data
<input type="checkbox"/> On/Off Status and Controls
<input type="checkbox"/> Cell Tower Records (logs, user location, time, date)
<input checked="" type="checkbox"/> Data Collected by Apps (itemize)

2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

<input type="checkbox"/> Contact List and Directories
<input type="checkbox"/> Biometric Data or Related Data
<input type="checkbox"/> SD Card or Other Stored Data
<input checked="" type="checkbox"/> Network Status
<input checked="" type="checkbox"/> Network Communications Data
<input type="checkbox"/> Device Settings or Preferences (security, sharing, status)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

2.2.4 Who owns and/or controls the system involved?

<input type="checkbox"/> USAID Office:
<input type="checkbox"/> Another Federal Agency:
<input checked="" type="checkbox"/> Contractor: Optimal will manage access to SART Ed working with USAID System Owner
<input checked="" type="checkbox"/> Cloud Computing Services Provider: IT-CNP will host SART Ed in a FedRAMP-certified environment.
<input type="checkbox"/> Third-Party Website or Application Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:

3 Privacy Risks and Controls

3.1 Authority and Purpose (AP)

3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?

Not applicable. SART Ed does **not** collect, use, maintain, or disseminate PII.

3.1.2 Why is the PII collected and how do you use it?

Not applicable. SART Ed does not collect or use PII.

3.1.3 How will you identify and evaluate any possible new uses of the PII?
Not applicable. SART Ed does not collect or use PII.

3.2 Accountability, Audit, and Risk Management (AR)

3.2.1 Do you use any data collection forms or surveys?
<input type="checkbox"/> No:
<input checked="" type="checkbox"/> Yes:
<input checked="" type="checkbox"/> Form or Survey (Please attach)
<input type="checkbox"/> OMB Number, if applicable:
<input type="checkbox"/> Privacy Act Statement (Please provide link or attach PA Statement)

3.2.3 Who owns and/or controls the personal information?
<input checked="" type="checkbox"/> USAID Office: SART Ed will serve as a central repository of datasets for USAID/E3/ED that do not contain PII. The education office working with their implementing organizations will ensure that datasets are cleared for release in a manner that conforms to USAID recommended practices.
<input type="checkbox"/> Another Federal Agency:
<input type="checkbox"/> Contractor:
<input type="checkbox"/> Cloud Computing Services Provider:
<input type="checkbox"/> Third-Party Web Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input checked="" type="checkbox"/> Other: Implementing organizations: Data will be collected and cleaned of PII by the implementing organizations that operate under other USAID mechanisms. SART Ed will not include any PII.

3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:

3.3 Data Quality and Integrity (DI)

3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.4 Data Minimization and Retention (DM)

3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?

No. SART Ed does not collect, use, maintain or disseminate PII.

Yes:

3.4.4 What types of reports about individuals can you produce from the system?

Reporting is done at the aggregate-level for SART Ed (e.g., countries, etc.) only. In addition, only the following information is collected with respect to children:

- Education Record (Only the grade a child is attending and in some cases, the type of school (i.e., government school, private school).
- Sex or Gender
- Age
- Other: Data may also include: Month and year of birth (but not full birthdate); grade of school attended (but not full school records); broad location information for a school (e.g., state and urban/rural location of school).

No personally identifiable information about individuals is collected, used, maintained or disseminated by SART Ed

3.4.6 Does the system monitor or track individuals?

(If you choose Yes, please explain the monitoring capability.)

No. SART Ed does not monitor or track individuals.

Yes:

3.5 Individual Participation and Redress (IP)

3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.7 Transparency (TR)

3.7.1 Do you retrieve information by personal identifiers, such as name or number?

(If you choose Yes, please provide the types of personal identifiers that are used.)

No.

Yes:

3.7.2 How do you provide notice to individuals regarding?

1) The authority to collect PII:

2) The principal purposes for which the PII will be used:

3) The routine uses of the PII:

4) The effects on the individual, if any, of not providing all or any part of the PII:

Not applicable. SART Ed does not collect, use, maintain, or disseminate PII so no notice provided on the system.

3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

No

Yes:

3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.8 Use Limitation (UL)

3.8.1 Who has access to the PII at USAID?

Not applicable. SART Ed does not collect, use, maintain or disseminate PII.

3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

Not applicable. SART Ed does not collect, use, maintain, or disseminate PII.

3.8.4 Do you share PII outside of USAID?

If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?

No. SART Ed does not collect, use, maintain, or disseminate PII.

Yes:

3.9 Third-Party Web Sites and Applications**3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?**

Not applicable. SART Ed does not use third party web-sites.

Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links
<input checked="" type="checkbox"/> None. There are no documents or links that I need to provide.
<input type="checkbox"/> Privacy Threshold Analysis (PTA)
<input type="checkbox"/> Privacy Impact Assessment (PIA)
<input type="checkbox"/> System of Records Notice (SORN)
<input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)
<input type="checkbox"/> Data Collection Forms or Surveys
<input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices
<input type="checkbox"/> USAID Web Site Privacy Policy
<input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application
<input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents