



Privacy Impact Assessment *Accuplacer*

Part 1 – General

Name of Department:	VCC Assessment Center		
PIA Drafter:	Norman Chang		
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AVP Student & Enrol Services:	Clayton Munro		
Email:	cmunro@vcc.ca	Phone:	604-871-7000

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

English language assessments at VCC have traditionally been administered in an offline paper format. As we move forward in a world of blended delivery, and grow our student population, VCC is seeking a solution for delivering English Language Assessments that is both current and scalable. This project aims to identify, procure, and implement an updated system for delivery and assessment.

Assessment Services should deliver modern, centralized, efficient, and cost-effective English Language Assessments. Digital delivery of these tests allows for a more modern, adaptable, and scalable approach, while allowing faculty within the assessments centre to focus more time on pre- and post-assessment support for students.

After months of research into VCCs needs, assessment best practices, and the solutions available on the market, VCC has decided to pursue College Board's ACCUPLACER tool as our English language assessments solution. This solution is intended to be long-term and has no end date. ACCUPLACER is a web-based platform.

2. Scope of this PIA

The scope of this PIA covers the use of ACCUPLACER English language assessments for all assessment centre needs at VCC. ACCUPLACER also offers mathematics testing, which is out of scope for the current project, but may be considered by the assessments centre in the future. Data is stored on AWS servers in the United States. There will be integration to Banner through text file input.



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AWS as a hosting service is outside the scope of this PIA.

Elluician Banner is outside the scope of this PIA.

Active Directory (AD) is not being utilized for the account management.

3. Related Privacy Impact Assessments

We are unaware of any PIA associated with Accuplacer. The use of AWS is covered by the BCNET PIA.



2017 BCNET AWS
PIA.doc

4. All Elements of Information or Data

The elements of information or data utilized various based on the integration of service.

Student interaction with Accuplacer:

- *Student name (first and last)*
- *Student contact information (address, background, email address, telephone number, gender, birthday, VCC ID.)*
- *Student test grades results or grades*
- *Username (X#) and password for Accuplacer*

VCC staff interaction with Accuplacer:

- *Name (first and last)*
- *VCC email address*
- *Position title*
- *Username (X#) and password for Accuplacer*
- *Administrative access based on assigned roles*



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Accuplacer interaction with VCC:

- *Authentication:*
 - *Students and staff can authenticate with Accuplacer directly using Accuplacer's native authentication, signing in with a unique X# username (X# - the Accuplacer identifier) and password.*
 - *Accuplacer sends several export files, which includes name, personal information, and results/grades to VCC. VCC uses this information to update Banner.*

Accuplacer interaction with Banner Ellucian:

- *Banner is considered as system of record. A single integration has been built to support data import from Accuplacer to Banner Ellucian. It is scheduled to run once a day with validation check and exception reports.*

Historical data migration and retention:

- *No historical data will be populated. ACCUPLACER maintains a 5-year history of data so if an institution terminates use, the data will reside in the system for 5 years.*

If personal information is involved in your initiative, please continue to the next page to complete your PIA.



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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

Data for this initiative will be stored in US and accessed in Canada. The platform is managed by Pearson, the development contractor for ACCUPLACER. Disclaimer is displayed within the portal.

International Users and Transfers of Information

The ACCUPLACER System operates on a software as a service platform that is located within the United States. Accordingly, your Student Data may be transferred from your testing location to the United States. College Board is the data controller of Student Data. The data controller of remote proctoring data is the remote proctoring service and/or your educational institution.

ACCUPLACER's data is in its own cloud accounts with role-based restricted access to all the data. College Board has ISO 27001 and SOC-2 certifications and is certified by third-party auditors annually to help them proactively manage risks and controls.



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6. Data-linking Initiative

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.	
1. Personal information from one database is linked or combined with personal information from another database;	yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact the Privacy Officer to discuss the requirements of a data-linking initiative.	



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7. Common or Integrated Program or Activity*

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

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8. Personal Information Flow Diagram and/or Personal Information Flow Table

s. 15(1)(l)



Attached is the implementation of score web service data from Accuplacer:



score-web-service-client-3-x (1).pdf

Personal Information Flow Table

	Description/Purpose	Type	FOIPPA Authority
1.	New student accesses Accuplacer web site to register for test; creates account	Collection	26(c)
3.	VCC Assessment staff create staff/instructor accounts	Collection & Use	26(c) and 32(a)
4.	Personal information exported from Accuplacer to Ellucian Banner through a secure integration data exchange.	Disclosure & Use	33.1(1)(i), 33.1(1)(i.1) and 32(a)

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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for personal purposes</i>	<i>Staff and contract instructors bound by employee/contractor agreement; staff bound by Standards of Conduct</i>	<i>Low</i>	<i>High</i>
2.	<i>Student information request may not actually be from student (i.e. their Accuplacer account may be compromised)</i>	<i>Students are instructed not to share account login information; students can update passwords if they believe they have been compromised</i>	<i>Low</i>	<i>High</i>
4	<i>VCC integration server is compromised</i>	<i>This server will be located behind VCC firewall and protect with standard VCC security practices</i>	<i>Low</i>	<i>High</i>

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located.

VCC privacy page link is added to the beginning of the test:



RE VCC privacy
policy.txt



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<https://www.vcc.ca/about/college-information/privacy-policy/>

Within the above policy, a summary of the approach has been provided with link to disclaimer as well as contact information (#3).

More detail information is included under the information disclaimer section:

<https://www.vcc.ca/about/college-information/disclaimer/>

Under What Authorization We Collect (#2)

We collect personal information from you as authorized by the College and Institute Act. The personal information we collect is necessary to:

- *obtain a personal education number (PEN) for the student*
- *carry out institutional responsibilities related to operating program or activity*
- *prepare and submit budgets, financial statements, reports and other information that the minister considers necessary to carry out the minister's responsibilities in relation to institutions*
- *conduct institutional research and statistical analysis*

The Freedom of Information and Protection of Privacy Act has directed that we provide you with this background. You may be assured that we will take all reasonable measures to ensure that your information is treated in a confidential manner.

Why We Collect (#1)

We collect personal information:

- *For the purpose of sending you official correspondence related to your education at VCC, communicating with you in an instructional capacity, and gathering essential information for operating purposes.*
- *For the purpose of providing students with the opportunity to participate in former student outcome surveys. The results of these surveys are used to improve the quality and effectiveness of instruction and services that we provide.*



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The Ministry uses this information in order to monitor institutional progress and comply with government stated objectives.

To conduct institutional research on education policy issues, such as quality of education, student satisfaction, ease of transfers, student access, future student needs, evaluate training needs for a variety of population groups such as insert students, transfer students, first nations students, international student etc.

Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section.

11. Please describe the physical security measures related to the initiative (if applicable).

Accuplacer application is hosted at the secure Amazon Web Services data centre in US. AWS physical access security is stated in the details under this page:

<https://aws.amazon.com/compliance/data-center/controls/>

EMPLOYEE DATA CENTER ACCESS

AWS provides physical data center access only to approved employees. All employees who need data center access must first apply for access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access, and are time-bound. Requests are reviewed and approved by authorized personnel, and access is revoked after the requested time expires. Once granted admittance, individuals are restricted to areas specified in their permissions.

THIRD-PARTY DATA CENTER ACCESS

Third-party access is requested by approved AWS employees, who must apply for third-party access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access, and are time-bound. These requests are approved by authorized personnel, and access is revoked after request time expires. Once granted admittance, individuals are restricted to areas specified in their permissions. Anyone granted visitor badge access must present identification when arriving on site and are signed in and escorted by authorized staff.

12. Please describe the technical security measures related to the initiative (if applicable).



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Information on technical security measures provided by AWS can be found at: <https://aws.amazon.com/compliance/data-center/controls/>

Following security measures have been deployed to our Accuplacer instance:

- Encryption and Deletion Protection are enabled for ACCUPLACER's DB clusters. RDS uses industry-standard AES-256 encryption algorithm to encrypt data on the server where it is hosted. Data on RDS DB are encrypted at rest. Backups are automated.
- Containers, where applications run, are running on AWS Fargate which are in private VPC subnets
- Application infrastructure and codebase are scanned with industry-standard tools (e.g., Snyk, Checkmarx, Qualys)
- Container images are also scanned when pushed to AWS ECR repositories
- WAF rules are in place for all ALBs and CloudFront distributions to detect any attacks
- Alerts are in place for application/services
- The College Board is committed to data and information security. To that end, they maintain an ISO 27001 certification as well as a SOC 2 Type 1 report, which includes ACCUPLACER within its scope.

13. Does your department rely on any security policies? If so, indicate here:

Internal VCC security protocols and policies.

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

Accuplacer does not give Customers direct access to the production database for security and data protection purposes. ACCUPLACER's data are in its own cloud accounts with role-based restricted access to all the data. Read access to Customer data without utilizing the production database can be done through the secure API.

Accuplacer follows industry standard security practices to protect the personal information submitted to us, both during transmission and once it's received. College Board has achieved ISO 27001 certification for our information security program, is certified by third-party auditors annually, provides annual SOC 2 reporting on their information security program, and is PCI compliant. These practices help them proactively manage risks and controls. They never ask students or parents to send credit card, bank, or password information over the phone or by email.



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VCC staff access is managed by a permissions library and uses standard access control methods for every object in the system. The ability to view, create, modify and delete is all controlled at the user level with role-based permissions framework. VCC staff assigned administrative rights set staff and instructor access based on their business processes.

15. Please describe how you track who has access to the personal information.

College Board will give you information about whether we have, or process on behalf of a third party, any of your personally identifiable information. To request this information send a message to Customer Service.

Customer Service Contact Information:

*College Board
250 Vesey Street
New York, NY 10281
Phone: (844) 849-3551*

Individuals can also access, correct, or ask questions about their identifiable information by logging in to their account or contacting Customer Service.

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated. If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Students have the ability to update their personal information via their Accuplacer account. This information will NOT update in Ellucian Banner. A separate process will be required. Test information corrections would be made through the Assessment officer staff.

Personal information is not shared outside of Vancouver Community College.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.



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Test/Grade information could possibly be used to make decisions regarding a student's ability to hold a designation and meet requirements for further course enrollment (i.e. GPA pre-requisite).

- 18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

Staff and instructors of Vancouver Community College are held to a professional standard.

- 19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

Academic information is retained as per the college's Record Management Policy:

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-policy-2018-06-27.pdf>

and associated procedures:

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-procedures-2018-06-27.pdf>

Part 5 – Further Information

- 20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

No.

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Privacy Officer.

- 21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

No.



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Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer.

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

A personal information bank of student information will be created in Accuplacer. VCC is able to provide the descriptors required as part of this initiative.

As per section 69 (6) of FOIPPA:

(6) The head of a public body that is not a ministry must make available for inspection and copying by the public a directory that lists the public body's personal information banks and includes the following information with respect to each personal information bank:

- (a) its title and location;*
- (b) a description of the kind of personal information and the categories of individuals whose personal information is included;*
- (c) the authority for collecting the personal information;*
- (d) the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;*
- (e) the categories of persons who use the personal information or to whom it is disclosed;*



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Part 6 – Privacy Comments

This PIA is based on a review of the material provided as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update.



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Part 7 - Program Area Signatures

C. MUNRO

AVP Student & Enrol Services


Signature

April 4, 2023
Date

Ellen Wainwright

Director IT


Signature

April 4, 2023
Date

From: Patricia Mori
Sent: March 30, 2023 9:36 AM
To: Norman Chang
Cc: Aamra Bilal
Subject: RE: VCC privacy policy

Hi Norman,

In my last email I asked if it was in the RegisterBlast appointment making system but did you mean when students are in the actual Accuplacer test? If so, we did add a VCC privacy policy in the Accuplacer test for student's to agree or disagree to before they begin the test. Please see below.
This was given to us by Lawrence.

Vancouver Community College Notification for Disclosure of Personal Information Outside of Canada

As part of Vancouver Community College's (VCC) deployment of the College Board ("the Provider") Accuplacer platform, your personal information will be collected and used by VCC and the Provider for the purposes of facilitating the use of the Accuplacer platform.

The Provider stores personal information outside of Canada. Your first name, last name, email address and other personal information will be stored, used, and accessed by the Provider outside of Canada for the sole purpose of providing cloud-based Accuplacer services to you.

VCC maintains the highest standards for the protection of your personal information in our custody and control. VCC also contractually requires its service providers to equally maintain these standards.

For more information on VCC's privacy policies and practices please click here:

<http://www.vcc.ca/about/college-information/privacy-policy/>

For more information on College Board's Accuplacer privacy policies and practices, please click here:

<https://privacy.collegeboard.org/>

By agreeing to the disclosure of your personal information as described above, you will be able to use this application.

This consent will be in effect as of the date of submission and will remain in effect for the duration of your education with VCC.

Thanks,
Pat

From: Norman Chang <nchang@vcc.ca>
Sent: March-29-23 4:21 PM
To: Patricia Mori <pmori@vcc.ca>
Cc: Aamra Bilal <abilal@vcc.ca>
Subject: VCC privacy policy

Hi Pat,

Can you please work with the vendor to add VCC privacy link somewhere during account registration
<https://www.vcc.ca/about/college-information/privacy-policy/>

thx

Norman Chang
Director, IT
Vancouver Community College
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