

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

10/27/2016

OPDIV:

OS

Name:

Training Tracking Database

PIA Unique Identifier:

P-8695122-356807

The subject of this PIA is which of the following?

Minor Application (child)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

No

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

Describe the purpose of the system.

The Training Tracking Database (TTD) is a web application that collects, manages, and analyzes training programs, which contain data on students and classes. A variety of training programs are offered on occupational safety and health topics including but not limited to: Indoor Air Quality: Factors Affecting Health, Occupational Noise Exposure Awareness and Asbestos Awareness.

Describe the type of information the system will collect, maintain (store), or share.

TTD is an intranet web application that the Federal Occupational Health's (FOH) Training Center uses to collect, manage, and analyze training programs and store data on students and training classes.

FOH training programs are designed to meet required state and Federal requirements and can be customized to meet agency-specific policies and procedures as well. Course availability can be viewed on the Federal Occupational Health website or call the FOH Training Center.

In order to register for a course, one must contact the director of the FOH Training Center either via phone or email. The contact information for the FOH Training Center Director is available on the FOH website. To register for a class, the student's name, agency, supervisor, work email address and student's work phone number must be provided via email or over the phone to the FOH Training Center Director. The student's work email provided must be a .gov or .mil extension. The director enters the students' information into the TTD.

Students taking the accredited Asbestos and Lead course (A& LC) complete training forms that ask for date of birth (DOB), social security number (SSN), and home mailing address; this information is entered into the TTD. In case students decide to pursue a license from the State of Maryland the following information is sent to the Maryland Department of Environment (MDE): student name and date of birth.

At the completion of the course the director sends a copy of the students certificate (via UPS) to either their supervisor or agency HR representative. In addition, those students will receive a certificate card that will include their picture. Those that successfully complete courses that are accredited by the District of Columbia will receive a certificate card as well. The administrator has HHS credentials (HHS user name and password) to access TTD. No contractors access TTD.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

The TTD database stores both student (information regarding who is enrolled in the class) and class information (student performance, eg exam scores and attendance). The student information includes Personally Identifiable Information (PII) data such as: students' name, agency, supervisor and work email. If they are students in the A&LC, their DOB, SSN, and home mailing address will be in the system as well.

TTD can generate a student list per class via the Standard Form (SF)-182, which is a form for approval, authorization and certification of completion, sign-in sheet, certificates, and training selection about the class. TTD provides statistics, such as the total number of students enrolled, total number of students completed training, total amount of revenue, and total number of classes being held. TTD can provide PDF reports, such as the enrollments totals by class, purchase order information, certification expirations, enrollment revenue, student status, and instructor assignments. TTD can provide blank forms, such as the SF182 and sign-in sheet. Also, TTD has an administration feature to maintain user account access to TTD. The administrator has HHS credentials (HHS user name and password) to access TTD. No contractors access TTD.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Social Security Number

Date of Birth

Name

Photographic Identifiers

E-Mail Address

Mailing Address

Phone Numbers

Certificates

Home Address

HHS user name and password credentials

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Employees

Business Partner/Contacts (Federal/state/local agencies)

How many individuals' PII is in the system?

100-499

For what primary purpose is the PII used?

The student data is maintained in order to track their course registration from course sign-up to course completion.

Describe the secondary uses for which the PII will be used.

Information can be shared with the Students Federal Agency Training Coordinator. TTD can provide statistics and reports on training.

Describe the function of the SSN.

There are instances when the Maryland Department of the Environment calls the Director requesting the students SSN of those that have successfully completed their accredited course in case they decide to pursue a license from the state .

Cite the legal authority to use the SSN.

5 U.S.C. §1302, 5 U.S.C. §4118,

Identify legal authorities governing information use and disclosure specific to the system and program.

HHS/FOH, as the servicing agency enters into this interagency agreement pursuant to 5 U.S.C. § 7901

Health Services Programs (PL 79-658) that authorizes the heads of agencies to establish health services programs and 42 U.S.C. 231 and the Service and Supply Fund (SSF) Charter.

Are records on the system retrieved by one or more PII data elements?

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

OPM/Govt-1 - General Personnel Records

09-90-0018 - Personnel Records in Operating Offices

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person

Hardcopy

Email

Other

Government Sources

Within OpDiv

Other HHS OpDiv

Other Federal Entities

Identify the OMB information collection approval number and expiration date

This program does not collect information from the public, and therefore, is not subject to the requirements of the Paperwork Reduction Act.

Is the PII shared with other organizations?

Yes

Identify with whom the PII is shared or disclosed and for what purpose.

Within HHS

Agency training coordinators and supervisors may request a list of the students that successfully completed coursework.

Other Federal Agencies

Agency training coordinators and supervisors may request a list of the students that successfully completed coursework.

State or Local Agencies

Agency training coordinators and supervisors may request a list of the students that successfully completed coursework.

Describe any agreements in place that authorizes the information sharing or disclosure.

Each customer agreement has an individual inter-agency agreement with FOH. These agreements specify the services provided between FOH and its customer agency. FOH monitors these agreements to ensure that they are fulfilled and that the serviced are billed appropriately.

Describe the procedures for accounting for disclosures.

Disclosures are accounted for after each accredited Asbestos or Lead training course has been completed because the FOH Training Center mails a copy to Maryland Department of Environment (MDE) or Pennsylvania Department of Labor form back to the department. The copies are sent via UPS and all training forms are documented and kept in a locked file in the training center. Each shipment must be signed for and the agency calls to confirm that they have received all the paperwork. All students are informed that the forms they fill out will be sent to the either MDE or the Pennsylvania Department of Labor in case they decide to pursue a license from the State.

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Individuals are aware that their personal information will be collected because each individual that attends an accredited Asbestos or Lead training course completes a form in order for their identification card to be issued, that asks for their DOB, SSN, and home address.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

Individuals can opt-out of collection or use of their PII by deciding that they no longer want to take a certain class. If so, they will either not be registered for the class or their registration will be removed from the database. Additionally, If a system administrator decides to opt-out of using their user credentials, they will not be able to access the system.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

In the event of major changes, FOH would provide e-mail notification to affected persons.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

If information is inaccurate or an individual suspects their PII has been misused, all the usual avenues for addressing the misuse are available, including contacting the Director of the FOH Training center, supervisors, FOH help desk and/or the Computer Security Incident Response Center. Once the Director of the FOH Training Center is notified, the FOH help desk would be contacted. The FOH Help desk would work with the source to gather information necessary to file a complete incident report with the HHS Computer Security Incident Response Team (CSIRC). The FOH Help desk would notify the appropriate internal parties to contact CSIRC, as well as the FOH privacy representative. The FOH Office of the Director would be notified of the actual breaches of PII or Protected health information (PHI). CSIRC would review the FOH generated incident report and provide FOH with mitigation guidance. The FOH Help desk would coordinate with CSIRC staff involved to coordinate acceptable resolution of reported issues.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

The system has been through a security accreditation following the National Institute of Standards and Technology (NIST) 800-53 guidelines, and has been independently verified to provide data integrity and availability as required by the medial programs that use it, and on a routine basis (at least annually), it is required to demonstrate to independent auditors that these capabilities are maintained.

Data is used as part of training work flow and is reviewed with the employee or their supervisor at the time of collection, so normal processes drive review and correction of data. While most training registration information collected is used for registration and reporting once a course is complete, reporting information can be provided to the agency training coordinator or supervisor based on availability and relevance. Upon preparing any report requests, the administrator will review the information for integrity and accuracy.

Identify who will have access to the PII in the system and the reason why they require access.

Administrators:

Only the Admin user can use all the features in TTD. The administrators user id and password are maintained in the system. The administrator inputs student course enrollment information into TTD and inputs course exam scores and course attendance.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Only the Administrator user can use all the features in TTD. The administrators user ID and password are maintained in the system. The system administrator is the only person that has access to TTD. Access is granted on a "least privilege" basis and is restricted through the use of the security features of each system. Role-based access provides that capability.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

Only the Admin user can use all the features in TTD. The administrators user ID and password are maintained in the system. Only the Director of the FOH Training Center has the role of admin user for TTD.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

The HHS Office of the Secretary complies with the Federal Information Security Management Act's (FISMA) requirement that all agencies require all system users (employees and contractors) to be exposed to security awareness materials, at least annually and prior to the employee's use of, or access to, information systems. Current trainings include:

Describe training system users receive (above and beyond general security and privacy awareness training).

Users with security or administrative jobs are required to take standard role based training as defined and provided by Department of Health & Human Services.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

TTD records fall under the Official Personnel Folder (OPF) and is maintained for the period of the employee's service in the agency and is then, if in a paper format, transferred to the National Personnel Records Center for storage or, as appropriate, to the next employing Federal agency. If the OPF is maintained in an electronic format, the transfer and storage is in accordance with the Office of Personnel Management (OPM) approved electronic system. Other records are either retained at the agency for various lengths of time in accordance with the National Archives and Records Administration records schedules or destroyed when they have served their purpose or when the employee leaves the agency. The transfer occurs within 90 days of the individuals' separation. In the case of administrative need, a retired employee, or an employee who dies in service, the OPF is sent within 120 days. Destruction of the OPF is in accordance with General Records Schedule-1 (GRS-1) or GRS 20.

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Administrative Security - The Administrator is on the only personnel that had access to TTD. The administrator uses HHS credentials to access TTD assigned to the appropriate role(s) and permission list(s) based on their job functions.

Technical Security - After 15 minutes of inactivity the workstation is locked and requires the user to re-authenticate prior to re-establishing access to any applications. Users are required to change their passwords every 60 days.

Physical Security - Screening access through the use of trained security personnel viewing Government Personal Identity Verification (PIV) cards.

Note: web address is a hyperlink.