

U.S. Department of Commerce



Privacy Threshold Analysis for the Commerce Learning Center (CLC)

U.S. Department of Commerce Privacy Threshold Analysis

Commerce Learning Center (CLC)

Unique Project Identifier: Contract No.: SS1301-17-BU-0002, Order No. SS130117CC0033

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose: *Provide a general description of the information system in a way that a non-technical person can understand.*

The E-Government Act of 2002 defines "information system" by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: "Information system" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

a) *Whether it is a general support system, major application, or other type of system*

The Cornerstone OnDemand (CSOD) Next Generation Learning Management System (NGLMS) is the learning management system for DOC and its bureaus. For the purposes of this document, it is referred to as the Commerce Learning Center or "CLC." The system manages instructor led training by providing a mechanism for creating courses, scheduling classes, and registering users for those courses. The system also tracks instructors and rooms that are used for training. In addition to managing instructor led training, the system provides access to online courses. The system supports processing of external training requests via Standard Form (SF) 182, Authorization, Agreement and Certification of Training. The system allows entry of training records completed outside of the system. The system provides the capabilities of reporting on how training is configured within the

system, training completed, and assigned training not completed. The system can also send email notifications to remind users of training events and required training not completed. The system may eventually allow name and email information to be transferred from other HR systems, such as the National Finance Center (NFC).

In order for the system to provide this functionality, the system stores training information (courses, training rooms, instructors, and training completion history), non-sensitive personally identifiable information (PII), and human resource (HR) information.

b) System location

The physical location of the system is managed by Cornerstone, who uses the Equinix data centers. The production system is located in El Segundo, CA and the disaster recovery site is located in Ashburn, VA.

c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)

The CLC is a standalone system that does not currently interconnect with systems. Data is populated in this system via a manual data feed process.

d) The purpose that the system is designed to serve

This system serves in administering human resources programs by the delivery, maintenance and reporting of agency training and training initiatives.

e) The way the system operates to achieve the purpose

The following functions can be performed within CLC to achieve its purposes:

- i. Employee Registers for Instructor Led Training
 1. Employee logs into system.
 2. Employee searches for training.
 3. Employee registers for training.
- ii. Employee Completes Online Course
 1. Employee logs into system.
 2. Employee searches for online training. Otherwise, the training may be assigned to the employee.
 3. Employee launches online training by selecting the link to start the online course.
 4. Employee completes online course.
- iii. Employee Requests External Training
 1. Employee logs into system.
 2. Employee completes SF-182. The online SF-182 does not capture the Social Security Number (SSN) or Date of Birth (DoB). The employee is tracked via User ID which is his/her email address.
 3. Employee submits SF-182.

4. Supervisor reviews request as well as other individuals (second tier supervisor, training administrators, financial approvers) and approves or denies the request.
 5. Employee completes post-course survey after successful completion of course.
- iv. Administrator Creates Training
 1. Administrator logs into system.
 2. Administrator inputs supporting information for course including provider, room information, and instructor information.
 3. Administrator creates course including information such as course description, target audience, subject areas, and related competencies.
 4. Administrator creates session for course if led by instructor, including dates, times, and locations where the course session will be offered.
 - v. Administrator Runs Learning History Report
 1. Administrator logs into system.
 2. Administrator chooses report to run.
 3. Administrator chooses criteria for report, such as users and courses to include.
 - vi. Office of Personnel Management (OPM) Enterprise Human Resource Integration (EHRI) Data Management
 1. Administrator logs into system.
 2. Administrator chooses report to run.
 3. Administrator chooses criteria for report, including training related data feeds from the system.
- f) *A general description of the type of information collected, maintained, use, or disseminated by the system*
The personal information collected in this system includes Employee ID, Name, Gender, Race, Email Address, Occupation, Job Title, Work Address and Telephone Number. This system also maintains training courses/details, training transcripts (assigned, in progress, completed and archived) and training reports (run by administrators). The PII on this system will only be used for the purposes of administering training.
- g) *Identify individuals who have access to information on the system*
The information in this system is accessed by all DOC employees and approved contractors and outside partners.
- h) *How information in the system is retrieved by the user*
Users login to the system over an encrypted link that is secured by TLS 1.2.
- i) *How information is transmitted to and from the system*

Information is transmitted to and from the system over an encrypted linked secured by TLS 1.2, RSA with 256 key exchange and AES256.

Questionnaire:

1. What is the status of this information system?

This is a new information system. *Continue to answer questions and complete certification.*

This is an existing information system with changes that create new privacy risks. *Complete chart below, continue to answer questions, and complete certification.*

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions		d. Significant Merging		g. New Interagency Uses	
b. Anonymous to Non-Anonymous		e. New Public Access		h. Internal Flow or Collection	
c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Character of Data	
j. Other changes that create new privacy risks (specify):					

This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*

This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or later). *Skip questions and complete certification.*

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

Yes. *Please describe the activities which may raise privacy concerns.*

No

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

Yes, the IT system collects, maintains, or disseminates BII about: (*Check all that apply.*)

- Companies
- Other business entities

No, this IT system does not collect any BII.

4. Personally Identifiable Information

4a. Does the IT system collect, maintain, or disseminate personally identifiable information (PII)?

As per OMB 07-16, Footnote 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..."

Yes, the IT system collects, maintains, or disseminates PII about: (*Check all that apply.*)

- DOC employees
- Contractors working on behalf of DOC
- Members of the public

No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate PII other than user ID?

Yes, the IT system collects, maintains, or disseminates PII other than user ID.

No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4c. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, and/or 4c are “Yes,” a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the approved PIA must be a part of the IT system’s Assessment and Authorization Package.

CERTIFICATION

 X I certify the criteria implied by one or more of the questions above **apply** to the Commerce Learning Center Nextgen Learning Management System (CLC) and as a consequence of this applicability, I will perform and document a PIA for this IT system.

 I certify the criteria implied by the questions above **do not apply** to the [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of Information System Security Officer (ISSO) or System Owner (SO): Gary Haney

Signature of ISSO or SO: GARY HANEY Digitally signed by GARY HANEY
Date: 2019.03.01 14:03:06 -05'00' Date: _____

Name of Information Technology Security Officer (ITSO): Jun Kim

Signature of ITSO: JUN KIM Digitally signed by JUN KIM
DN: c=US, o=U.S. Government, ou=Department of Commerce,
ou=Office of the Secretary, cn=JUN KIM,
0.9.2342.19200300.100.1.1=13001001483988
Date: 2019.03.01 13:46:05 -05'00' Date: _____

Name of Authorizing Official (AO): Renee Macklin

Signature of AO: RENEE MACKLIN Digitally signed by RENEE MACKLIN
Date: 2019.03.01 15:35:58 -05'00' Date: _____

Name of Bureau Chief Privacy Officer (BCPO): Wesley Fravel

Signature of BCPO: WESLEY FRAVEL Digitally signed by WESLEY
FRAVEL
Date: 2019.03.19 10:23:48 -04'00' Date: _____