






**U.S. Consumer Product Safety Commission
 PRIVACY IMPACT ASSESSMENT**

Name of Project:	Learning Management System
Office/Directorate:	EXRM

A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Al Anders, EXIT/ITTS/TSAD, x7663
System Owner: (Name, title, organization and ext.)	Donna Simpson, EXRM, x7218
System Manager: (Name, title, organization and ext.)	Al Anders, EXIT/ITTS/TSAD, x7663

B. APPROVING OFFICIALS

	Signature	Approve	Disapprove	Date
System Owner (EXRM)	 Donna Simpson	X		5/9/07
Privacy Advocate	 Linda Glatz, ITTP	X		5/10/07
Chief Information Security Officer	 Patrick Manley, ITTS	X		5/15/07
Senior Agency Official for Privacy	 Mary Kelsey, Director, ITTP	X		5/15/07
System of Record? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Reviewing Official:	 Patrick D. Weddle, AED, EXIT	X		5/15/07

C. SYSTEM APPLICATION/GENERAL INFORMATION

<p>1. Does this system contain any personal information about individuals? (If there is NO information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.)</p>	<p>Yes, the person's name, SSN, and date of birth are mandatory data fields and the person's address and telephone number are optional data fields.</p>
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D. DATA IN THE SYSTEM	
1. What categories of individuals are covered in the system? (public, employees, contractors)	CPSC Employees
2. Generally describe what data/information will be collected in the system.	The learning management system is used to track courses that an employee takes during the year. The employee enters a training request by entering their name, SSN, date of birth, course title, vendor name, course location, and other OPM specific data fields that pertain to the collection of training records.
3. Is the source of the information from the individual or is it taken from another source? If not directly from individual, then what other source?	The employee enters the information into the learning management system using the provided web form.
4. How will data be checked for completeness?	The employee's personal information (entered by the employee) is checked against information maintained by the CPSC enterprise directory for correctness.
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	The CPSC enterprise directory is maintained according to the processes for employee arrival (new employee) and employee departure (terminating employee) as defined by the Human Resources Department and EXIT.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	Yes, the data elements are described in the Learning Management DDL that is maintained in the EXIT Oracle database.
E. ATTRIBUTES OF THE DATA	
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	OPM has mandated that all federal agencies must submit training reports on a monthly basis. Section 4: Training Interface Processing of the "Guide to Human Resources" document defines the required fields for the training record. The employee SSN and date of birth are required fields. These fields must be collected by the learning management system and provided with each training record that is part of the monthly report.
2. For electronic systems, if the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.	The monthly training report is submitted over the OPM EHRI interface using a secure (encrypted) FTP connection. The connection can only be established by an authorized machine and user as predefined by CPSC and OPM.
3. How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.	The employee's last name is used to retrieve the employee's training records. The learning management system implements Single Sign On authentication using the Novell IChain proxy server (CPSC enterprise infrastructure server) and also implements Role Based Security to control access to system functions and data records. Only the employee who created the record has access to modify the record. Only supervisors, training administrators, and human resources have access to view a read only copy of the record. In all cases, the SSN is not displayed when the record is retrieved. No other users on the CPSC network have access to view the records.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Certain fields are mandatory according to OPM federal regulation. Employee's wishing to register for training must enter the required information. There is no option to decline, other than not using the system.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	Training records are kept for five years.
2. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures	Training reports are submitted to OPM via the secure EHRI interface. CPSC does not retain the training records.

documented?	
3. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	The training records include information such as the employee's name and optionally the employee's address and home telephone number.
4. What controls will be used to prevent unauthorized monitoring?	Authentication and Authorization controls are implemented. Access to training records is restricted, based on the user's authenticated identity and the user's security roles (permissions).
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	CPSC-
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	N/A – New System
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	CPSC employees and supervisors.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	Sensitive data fields such as SSN are not displayed when viewing the training records. Employees can only view their own records. Supervisors can view employee records. Supervisors are provided training on proper use of information.
3. Who is responsible for assuring proper use of the data?	EXRM and EXIT
4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?	NO
5. Do other systems share data or have access to the data in the system? If yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?	No other internal CPSC systems have access to the training records.
6. Will other agencies share data or have access to the data in this system? If yes, how will the data be used by the other agency?	The training records are uploaded once a month to OPM via the secure EHRI interface. OPM is responsible for the security of the EHRI interface.