

# GeoLearning

## Privacy Impact Assessment

### 1. IT System of Electronic Collection Identification

- a. **Who is completing the initial screening assessment?**

Director of Hosting Operations,  
Learn.com.

- b. **Who is the IT system or electronic information collection owner?**

GoLearn Program Director,  
OPM/GoLearn.

- c. **What is the IT system or electronic information collection name?**

GeoLearning Baseline Learning Management System (LMS).

- d. **Does the activity represent a new or significantly modified IT system or information collection?**

No.

- e. **Is this an IT system or project or an electronic information collection?**

IT System or Project.

- f. **What is the Unique Project Identifier (UPI)?**

N/A.

**g. Will this system or electronic information collection use web technology?**

Yes.

**h. What is the purpose of the IT system or electronic information collection and why is the information being collected?**

This system is used to deliver online training for Federal clients, in support of the OMB e-training initiative.

**i. What is the IT system or electronic information collection status?**

Operational.

**j. Is the IT system or electronic information collection operated by OPM staff, contractor staff, or a combination of OPM and contractor staff?**

Combination of OPM staff and contractor staff.

**k. Where is the IT system or electronic information collection physically located?**

Virginia and Iowa.

## **2. Initial Screening Assessment**

**a. Is an OMB mandated PIA required for this IT system or electronic information collection?**

Yes.

**b. Does the system or electronic information collection contain or collect any Personally Identifiable Information (PII)?**

Yes.

**c. Is this an IT system that collects PII on members of the public?**

Yes.

**d. Is this an electronic information collection that collects PII on members of the public?**

Yes.

**e. Is this an electronic information collection that collects PII on Federal employees?**

Yes.

### **3. The PIA**

#### **3.1. Nature and Source of Information to Be Collected**

**a. What is the nature of the information to be collected?**

Individual learner data elements collected through GoLearn program are Unique Student Identifier, social security number, date of birth, salary, gender, race, last update of student record and last update of user ID. Only a small number of GoLearn data elements are such that the unauthorized disclosure may constitute an invasion of personal privacy with potential for adverse impact on the individual.

**b. What is the source of the information?**

Directly from the person to whom the information pertains;

From other people;  
Other sources such as databases and web sites, etc.

### **3.2. Reason for Collection of Information**

**a. Why is the information being collected?**

The GoLearn program collects personal information about individuals in order to deliver efficient and effective training and development services designed to enhance the capacity of the Federal workforce to achieve higher levels of performance.

**b. Is there legal authority for collecting the information?**

Yes.  
OPM has the responsibility and authority for effective promotion and coordination of training programs and operations as contained in section 4117 of title 5 of the United States Code. Executive Order 11248 assigns additional responsibilities to OPM for planning and promoting the development, improvement, coordination, and evaluation of training in accordance with chapter 41 of title 5 of the United States Code and the policy set forth in the Executive Order.

### **3.3. Intended Use of the Collected Information**

**a. What is the intended use of this information?**

Information will be used for individual learning plans, training, and development. OPM will record employee training for reporting to OMB, as required. Information collected through the GoLearn program is being used to support e-learning solutions designed to enhance the capacity of the Federal workforce. Individual learner use information in the system to better align their competencies with the jobs they are assigned to perform or the career paths they choose to pursue. Administrators use information in the system to assure that the right individuals receive the training they need to achieve the highest levels of performance.

- b. For major IT investments as defined in OMB Circular A-11, a high level data flow diagram must be prepared?**

Yes.

### **3.4. Purpose and Identification of Information to be Shared**

- a. Does the system share Personally Identifiable Information (PII) in any form?**

Yes.

Personally Identifiable Information in the GoLearn program is typically shared with three types of individuals: individual learners, Federal managers with responsibility for groups of individual learners, and system administrators responsible for maintaining the system and supporting their users.

- b. Who will have access to the PII on the system?**

Users, Administrators, and Contractors.

- c. Is information part of a computer matching program?**

No.

### **3.5. Opportunities Individuals Have to Decline to Provide Information or to Consent to Particular Uses of the Information**

- a. Is providing information voluntary?**

Yes.

- b. Are individual informed about required or authorized uses of the information?**

Yes.

A web privacy policy statement informs users about required or authorized uses of any information being collected.

- c. **Will other uses be made of the information than those required or authorized?**

No.

### **3.6. Security of Information**

- a. **Has the system been authorized to process information?**

Yes.

- b. **Is an annual review of the IT system or electronic information collection conducted as required by the Federal Information Security Management Act (FISMA)?**

Yes.

- c. **Are security controls annually tested as required by FISMA?**

Yes.

- d. **Are contingency plans tested annually as required by FISMA?**

Yes.

- e. **Have personnel using the system been trained and made aware of their responsibilities for protecting the PII being collected and maintained?**

Yes.

- f. Are rules of behavior in place for individuals who have access to the PII on the system?**

Yes.

General users, System/database, administrators, developers, etc.

**3.7. System of Records as Required by the Privacy Act, 5 U.S.C. 552a**

- a. Are records on the system routinely retrieved by a personal identifier?**

Yes.

- b. Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?**

Yes.

US OPM GOVT-1.

- c. Does the SORN address all of the required categories of information about the system?**

Yes.

- d. Has any of the information in the SORN changed since the information was published?**

No.

- e. Are processes in place for periodic review of Personally Identifiable Information contained in the system to ensure that it is timely, accurate, and relevant?**

Yes.

#### **4. Certification**

A PIA is required and the OPM Chief Privacy Officer signed the PIA on September 22, 2006.