

**U.S. Department of Commerce  
National Technical Information Service**



**Privacy Threshold Analysis  
for the  
Commerce Learning Center**

## **U.S. Department of Commerce Privacy Threshold Analysis**

### **NTIS/Commerce Learning Center (CLC)**

**Unique Project Identifier:** N/A

**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 and its purpose 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).

The Commerce Learning Center (CLC) is the learning management system for DOC and its bureaus. The CLC system resides in a FedRAMP authorized cloud owned by Cornerstone on Demand (CSOD). The CSOD cloud is load balanced between two data centers. One in California, and one in Virginia. The CLC 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 also 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. This information is used to target training by groups such as position, grade, etc.

In future phases, the system’s capabilities will be expanded to include assisting users to manage their individual development plans and to manage competencies for the purpose of self-development. The system will store goals, activities to support goals, competency associated with job position, and competency rating.

**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): SF-182 form processing capability added. No SSN is collected nor able to be entered by the user.					

☐ This is an existing information system in which changes do not create new privacy risks. *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 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): Kevin Mahoney

Signature of ISSO or SO: Kevin Mahoney Date: 4/7/17

Name of Information Technology Security Officer (ITSO): Heather Lynch

Signature of ITSO: Heather Lynch Date: 04/06/2017

Name of Authorizing Official (AO): Allison McCall

Signature of AO: Allison McCall Date: 4/6/2017

Name of Bureau Chief Privacy Officer (BCPO): Sean McAndrew

Signature of BCPO: Sean McAndrew Date: 4/18/17