

# Privacy Impact Assessment AgLearn Next Gen

Policy, E-Government and Fair Information Practices

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# **Privacy Impact Assessment for AgLearn Next Gen**

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## Abstract

AgLearn Next Gen is an application fully hosted in a FedRAMP certified PaaS environment at Amazon Web Services GovCloud (AWS GovCloud) using their Platform as a Service (PaaS) CentOS offering (LAMP (Linux, Apache, MySQL, and PHP)).

AgLearn Next Gen is a learning management system that functions as the official system of record for all training in the USDA.

This PIA is being conducted as a result of the Privacy Threshold Analysis which found that the system requires a PIA to ensure the appropriate level of security incorporated into the system.

## Overview

AgLearn Next Gen is the official system of record for all training in USDA. AgLearn Next Gen provides an electronic SF-182 and Individual Development Plan (IDP) functionality that significantly reduces the paperwork requirements of traditional SF-182 and IDP submission. AgLearn Next Gen provides the capability to manage the SF-182 and IDP processes through its entire approval cycle. This provides the ability to maintain training cost records within a central location for easy access and reporting to Congress on departmental training costs. AgLearn Next Gen is a system that provides online administration of curriculum by trainers, individualized training capabilities, online registration, uniform content, collaborative tools, integrated back-end systems, and support many online delivery platforms such as SkillSoft, Lynda.com, Rosetta Stone and dMason.

AgLearn Next Gen is a total training management system which supports all aspects of training, not just online training. AgLearn Next Gen supports nearly 130,000 employees, partners and contractors, as well as agency lead administrators, agency Training Officers, and over 2,000 agency AgLearn Next Gen administrators.

Since the inception of AgLearn Next Gen in 2004, nearly 10 million online courses have been completed, of which approximately 3.9 million have been for mandatory training, 1.1 million for agency mission-specific training and 1.2 million for discretionary training. 9,800 discretionary courses have been built, over 15,000 online books have been provided, and more than 30 different language courses have been offered.

## **Section 1.0 Characterization of the Information**

### **1.1 What information is collected, used, disseminated, or maintained in the system?**

The system collects:

- Identifying Numbers
  - Employer IDs
- General Personal Data
  - Name
  - Education
- Work-Related Data
  - Occupation
  - Job Title
  - Work Address
  - Email Address
- User ID

### **1.2 What are the sources of the information in the system?**

Initial data sets for user profile information are loaded from the USDA Identity, Credential, and Access Management (ICAM) service's Enterprise Entitlements Management Service (EEMS). Course administrators upload content.

### **1.3 Why is the information being collected, used, disseminated, or maintained?**

The information collected is used to identify users of the learning management system.

### **1.4 How is the information collected?**

The information is collected by a data feed with the USDA ICAM EEMS.

### **1.5 How will the information be checked for accuracy?**

Users are able to view their information in the system.

Any user requests to modify their profile would go through their HR system, outside the AgLearn Next Gen system boundary.

**1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

General authority to collect the information in this system is 44 U.S.C. § 3101. Training information is collected and maintained under the provisions of the Government Employee Training Act (GETA), as codified in 5 U.S.C. §§ 4101-4118, with accompanying regulations promulgated in 5 C.F.R. § 410.311. Executive Order 11348, as amended by Executive Order 12107 also provides general authority for the collection of training information. Training data collected also is consistent with the Office of Personnel Management’s *Guide to Personnel Recordkeeping* and *Guide to Human Resources Reporting* pursuant to 5 C.F.R. § 410.601. Collection of race and national origin (RNO) information is also authorized by the Equal Employment Opportunity Commission (EEOC) Management Directive 715. Certain online trainings are required to be completed by the Federal Information Security Management Act, 44 U.S.C. § 3541 et seq. Also, collection of data from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) external learners on ATF F 6400.1, Training Registration Request for Non-ATF Students (OMB 1140-0053) and ATF F 6330.1, Application for National Firearms Examiner Academy (OMB 1140- 0049) is authorized by OMB in accordance with the Paperwork Reduction Act of 1995.

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

The system requires e-Authentication access with specific access to a role established for use. Data collected is necessary to the administration of training needs of employees and contractors as per the above regulations and as required on the OPM SF-182 Request for External Training form.

## Section 2.0 Uses of the Information

**2.1 Describe all the uses of information.**

The data is necessary to ensure accurate delivery of training and accurate recording of training records for each employee, affiliate, and contractor, especially as it relates to the completion of federally mandated training programs.

The data is used to determine a user’s eligibility and/or requirement for a particular internal training event as well as external training requests. It is used for administrative matters to improve the accuracy of training assignments, approvals, and completion reporting. It is also utilized for supporting both the assignment of human resource program training as well as the reporting of data back to the agency to determine eligibility for additional training and/or responsibilities.

**2.2 What types of tools are used to analyze data and what type of data may be produced?**

Data analysis is done through business rules in place with the EEMS data feed. The data within this system boundary is a replication of the EEMS data set. No additional analysis is performed on the data and no secondary data is produced.

**2.3 If the system uses commercial or publicly available data please explain why and how it is used.**

N/A

**2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

- All access to AgLearn Next Gen is constrained to HTTPS and authentication is protected behind ICAM eAuthentication.
- Authorizations are controlled within the system based on a user role. Users are restricted to only seeing their information or course content that has been expressly authorized for their access.
- Security controls are implemented in accordance with Federal, USDA, and NIST requirements in line with the security categorization of this system.
- There will be no publicly accessible data.
- There is a landing page accessible to the public without authentication and authorization at <https://aglearn.usda.gov>.
- Access to learner profiles and course content requires authentication, and access is role based.

## Section 3.0 Retention

**3.1 How long is information retained?**

Information is retained in accordance with NARA General Records Schedule 2.6 – Employee Training and are retained for 3 years or when superseded and obsolete.

**3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?**

Yes

**3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.**

The data retained in the system is related to course material and therefore does not carry risk due to duration of retention.

## Section 4.0 Internal Sharing and Disclosure

**4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

Training data associated with mandatory training (e.g. *Ethics, No Fear Act/Whistleblower, Information Security Awareness, Equal Employment Opportunity and OSHA*) may be shared by key system administrators through the appropriate component program office, with department auditors or program offices tasked with validating compliance with these training requirements.

**4.2 How is the information transmitted or disclosed?**

Automated reports are generated on training completions. These reports may contain privacy information and may be hosted for retrieval or emailed to the concerned parties.

The EEMS data feed is an automated server-to-server exchange.

**4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

Access to this information is controlled by multi-factor authentication and restricted to authorized individuals.

## Section 5.0 External Sharing and Disclosure

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

N/A

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

N/A

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

N/A

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

N/A

## Section 6.0 Notice

**6.1 Does this system require a SORN and if so, please provide SORN name and URL.**

N/A AgLearn Next Gen does not retrieve records using a personal identifier.

**6.2 Was notice provided to the individual prior to collection of information?**

N/A

**6.3 Do individuals have the opportunity and/or right to decline to provide information?**

N/A

**6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

N/A



- 6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

N/A

## Section 7.0 Access, Redress and Correction

- 7.1 What are the procedures that allow individuals to gain access to their information?**

Individuals are able to view any Personally Identifiable Information (PII) and/or Business Identifiable Information (BII) pertaining to them through their learner profile and record of learning in the LMS.

- 7.2 What are the procedures for correcting inaccurate or erroneous information?**

Individuals seeking to amend their profile information can do so by working with the human resources (HR) specialist within their division to make any required changes in the respective HR system. Updates will be applied through the next EEMS data feed.

- 7.3 How are individuals notified of the procedures for correcting their information?**

The user information is corrected through the organization's HR department; instructions to change incorrect employee information are located at <https://usda.custhelp.com> which can be accessed through the AgLearn help section (Ask AgLearn Now (Help)).

- 7.4 If no formal redress is provided, what alternatives are available to the individual?**

Redress is handled through a user's respective HR organization outside of the AgLearn Next Gen system boundary. A user's information within this system would be updated via the next EEMS data feed.

- 7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

There are limited privacy risks in regard to redress. Redress will be handled primarily in the system.

## Section 8.0 Technical Access and Security

### **8.1 What procedures are in place to determine which users may access the system and are they documented?**

USDA LMS accounts are created in two different ways depending on the user’s role. USDA segregates accounts into “managed” and “non-managed” accounts:

- All federal employees are considered managed which means they are in USDA’s HR system and their accounts are automatically created in the LMS by the HR feed. This includes managed contractors and partners. Add, change, and delete records are written in real time to an intermediate database from which they are batch fed to the LMS at 8am, 4pm and 12am. This type of user receives a notification from eAuthentication/HR when their account is created telling them to log in and take control of the eAuthentication account by changing their password.
- Contractors and partners that are not managed must first register with the USDA for their single sign on (SSO) / eAuthentication account. Then the AgLearn agency lead submits a request to Team AgLearn (group email) to create the account in the LMS. The user will receive a notification after their eAuthentication and another after their LMS registration. These account types are limited and require approval from ICAM.

### **8.2 Will Department contractors have access to the system?**

Yes

### **8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

The USDA requires annual information security awareness training (which includes an acceptance of the USDA’s rules of behavior and privacy/Controlled Unclassified Information (CUI) training) for all USDA AgLearn users.

Additionally, annual privacy training for access is required for all system administrators and database administrators.

Anyone designated as having a significant information security role (SISR) must also complete information security role-based training in accordance with NIST 800-53 Rev 4, Security Controls AT-3, Role-based Security training.

All required training is logged in AgLearn and reported annually as part of the organization’s FISMA reporting requirements.

**8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

This system received its initial authorization to operate (ATO) on 09/20/2018 with annual reviews completed for 2019 and 2020. The current review for ATO renewal on 09/20/2021 is in progress.

**8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

The system logs events including account creation, system access, and file modifications.  
Logs are captured locally on the system and off-boarded to a central logging facility.

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

The following privacy risks were identified:

- Accessing the system by inappropriate parties – mitigated by requiring e-Authentication and roles.
- Viewing hard copy by inappropriate parties – mitigated by following current requirements to protect hard copy information.

## Section 9.0 Technology

**9.1 What type of project is the program or system?**

AgLearn Next Gen is a minor application operating on open source technology.

**9.2 Does the project employ technology which may raise privacy concerns? If so please discuss its implementation.**

No

## Section 10.0 Third Party Websites/Applications

**10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

Yes

**10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

N/A – The agency does not utilize 3rd party websites or applications.

**10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

N/A

**10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

N/A

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

N/A

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

N/A

**10.7 Who will have access to PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

N/A

**10.8 With whom will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

N/A

**10.9 Will the activities involving the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

N/A

**10.10 Does the system use web measurement and customization technology?**

No

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

N/A – The agency does not use web measurement and customization technology.

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

N/A – The agency does not utilize 3rd party websites or applications.

## Responsible Officials

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