

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

03/10/2016

**OPDIV:**

CMS

**Name:**

Information Technology Security and Privacy - Computer Based Training

**PIA Unique Identifier:**

P-4374608-973680

**The subject of this PIA is which of the following?**

Major Application

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Operations and Maintenance

**Is this a FISMA-Reportable system?**

Yes

**Does the system include a Website or online application available to and for the use of the general public?**

No

**Identify the operator.**

Agency

**Is this a new or existing system?**

Existing

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.**

PIA Validation

**Describe in further detail any changes to the system that have occurred since the last PIA.**

None

**Describe the purpose of the system.**

Information Technology Security and Privacy -Computer Based Training (ITSP-CBT) System stores training information for the annual CMS Information Security and Privacy program.

**Describe the type of information the system will collect, maintain (store), or share.**

ITSP-CBT collects and maintains name, phone numbers, e-mail address, user IDs and training completion dates.

**Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.**

The system provides both CMS employees, Contractors, federal and state agencies with the required Information Security and Privacy Training via a computer based training module.

User ID is required to uniquely identify the user in Information Technology Security and Privacy -Computer Based Training (ITSP-CBT) System. Other general information such as Name, Email Address, Phone Number, training completion dates are used for internal reporting on the training status.

**Does the system collect, maintain, use or share PII?**

Yes

**Indicate the type of PII that the system will collect or maintain.**

Name

E-Mail Address

Phone Numbers

Education Records

User IDs; passwords

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

Employees

Business Partner/Contacts (Federal/state/local agencies)

Vendor/Suppliers/Contractors

Yes

**How many individuals' PII is in the system?**

10,000-49,999

**For what primary purpose is the PII used?**

Information is shared with the Enterprise User Administration system (EUA) database for the purpose of verifying users that are taking or have taken the required security awareness CBT. CBT is required for initial access to CMS systems and as part of annual system certification.

**Describe the secondary uses for which the PII will be used.**

Personally Identifiable Information (PII) such as name, official email address is utilized in reports to keep track of the Information System Security and Privacy Awareness (ISSPA) training completed by the CMS user.

**Identify legal authorities governing information use and disclosure specific to the system and program.**

42 CFR 401.101–401.148 and sec 1106(a) of the Social Security Act, 42 U.S.C. 1306(a)

**Are records on the system retrieved by one or more PII data elements?**

Yes

**Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or identify if a SORN is being developed.**

09-70-3005: Correspondence Tracking

**Identify the sources of PII in the system.**

**Government Sources**

Within OpDiv

**Identify the OMB information collection approval number and expiration date**

Not Applicable

**Is the PII shared with other organizations?**

No

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

No prior notice is given as the system doesn't directly collect any personal information. The information is provided by the EUA on a nightly basis as a data extract and CBT system only stores the minimum information needed to identify a CMS user and generate reports on training.

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.**

The PII that is collected is in a separate application, which is the EUA, therefore there is no ability to opt-out.

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

Notification is not provided by ITSP-CBT, because the PII is not directly collected from the individual.

**Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.**

The PII data is obtained from another CMS System, therefore, there is no process in place by CBT to address individual's concerns.

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

The PII data is obtained from another CMS System, therefore, the process to ensure PII is not improperly or inadvertently modified or destroyed is by only allowing system administrators to have access to the database containing PII. The PII fields are locked and cannot be changed; The process to ensure that

individuals who provide or modify PII cannot repudiate that action is done within the source (EUA) system. The process to ensure PII is available when needed is by having nightly updates run between the EUA systems and ITSP-CBT; the process to ensure that PII is sufficiently accurate for the purposes needed is ensured when the nightly updates are sync.

**Identify who will have access to the PII in the system and the reason why they require access.**

**Administrators:**

For various checks and balances to ensure completeness of data.

**Developers:**

May require access to PII due to their need for system administration.

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

The process has been defined in Information Technology Security & Privacy - Computer Based Training (ITSP-CBT) Operations & Maintenance Manual (OMM). Approval from ITSP-CBT Information System Security Officer (ISSO) is required to provide access to system users. Periodic review of accounts are done by CBT ISSO to make sure to remove unwanted accounts.

**Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.**

Role based access is provided to those having access to PII and is limited to a 'need to know' basis and access is granted per their user identification.

**Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.**

Annual Information System Security & Privacy Awareness (ISSPA) training is mandatory for all personnel who have access to PII which is limited to System Owner, System Developer Maintainer, CBT Admin Team and Data Base Administrator. This course covers the CMS Information System Security and privacy areas and provides the training and awareness required to protect the information.

**Describe training system users receive (above and beyond general security and privacy awareness training).**

Other training avenues such as conferences, seminars and classroom training provided by CMS/HHS is available apart from the regular annual training.

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

CMS follows the requirements listed in the National Archives and Records Administration (NARA) policy. Specifically, Chapter 8 Information Technology , Subchapter - Information Technology Security. GRS 20 and GRS 24.

**Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.**

The administrative, technical, and physical controls documented in the CMS Information Security ARS - Appendix B CMSR Moderate Impact Level Data shall be applied to this system. The administrative controls for system backup, contingency planning and training are applied. The technical controls for authorized access to the system, least privileges, and password and incident management are applied. The physical controls in place that consist of security guards, identification badges, key cards, cipher locks and closed circuit TV are applied.

Note: web address is a hyperlink.