



System Name: Food Nutrition Service (FNS)
Appendix J: Professional Standards Training Tracker Tool (PSTTT)

Privacy Documentation Checklist

Requirement	Y/N	Comments
Privacy Threshold Analysis (PTA)		
1. Has a PTA been developed for the system?	Y	Dated: 03/02/2016
2. Does the system contain personally identifiable information?	Y	Other: School Nutrition and Meal Service professionals Name
3. Is the PTA signed?	Y	04/07/2016
4. Is a Privacy Impact Assessment (PIA) required for the system?	Y	Dated: 10/20/2016
Privacy Impact Assessment (PIA)		
1. Does the PTA define the scope of the information collected, the reasons for its collections?	Y	The user will be able to create a user profile with the following information: School district/address, school name/address, individual name, email address, title of their position, and hiring date.
2. Does the PIA describe the uses of information and the accuracy of the data being used?	Y	The employees and managers are responsible for checking for accuracy of their own information. FNS staff will not be checking for accuracy.
3. Does the PIA describe how long information will be retained after the initial collection?	Y	Information will be retained for two years.
4. Does the PIA describe the scope of sharing within the United States Department of Agriculture?	Y	The information will be shared with Food and Nutrition Service and State agency employees for the purpose of tracking training hours for Administrative Review.
5. Does the PIA describe the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and/or the private sector?	Y	The information shared includes: employee name, school name, title of their position, email address, hiring date, training title and training

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		hours. The information will be shared with FNS and State agencies employees for Administrative Review purposes. The information is shared so school nutrition professionals can personally track their own training hours for professional standards requirements. Managers can enter in training for their own employees only.
a. Is personally identifiable information shared outside the Department?	N	
b. Under which System of Records Notice (SORN) does the system operate?	N	
6. Does the PIA describe the notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information?	Y	Tracking training is mandatory as stated on HHFKA, 2010, however using the USDA tool to track the trainings is voluntary.
7. Does the PIA describe an individual's ability to ensure the accuracy of the information collected about them?	Y	Each user has the ability to edit or delete entries.
8. Does the PIA describe technical safeguards and security measures?	Y	Internal users of the application are audited by the security office. The audit ensure a valid FNS-674 form is on file for ever internal users.
9. Does the PIA describe the selection process for any technologies used by the system?	N	No, the project does not employ technology which may raise privacy concerns.
10. Does the PIA describe the privacy impact of using third party websites and/or application	N	N/A

Additional Evaluator Comments:

FNS Professional Standards Training Tracker Tool (PSTTT) is used to track Professional Standards (PS) requirement set forth by the Healthy Hunger Free Kids Act (HHFKA) of 2010 requires PS for state and local school district nutrition professionals. In addition to hiring standards, mandatory annual training will be required for all individuals involved in preparing school meals. HHFKA details the number of required professional development hours that school nutrition professionals are required to receive on an annual basis.

A wide range of school nutrition and meal service professional staff uses the PSTTT. Within

each school, there may be some differences in terms of primary system users – individuals in a managerial role will have the ability to create profiles for their staff members if their staff members do not have access to a computer. The PSTTT will assist state agencies to record, track, and manage the required training hours in four major areas (Nutrition, Operations, Administration, and Communications & Marketing) to meet the requirements of the HHFKA Professional Standards Rule. The application will specify that users enter a business email address.

PSTTT will be accessible through FNS’ website (Internet) and mobile phone. The school nutrition professionals will have to obtain eAuthentication Level 2 to access the tool. The eAuth sits on the front-end .NET technology and the back-end database is a SQL Server database. The school nutrition professional will hit the site then re-directed to the eAuth site to log in. eAuth will verify permissions to enter the site and then re-direct them back to PSTTT, which is hosted at NITC.

Evaluator Recommendations:

- Privacy Office approves PTA and PIA.

*NOTE: PIA was not necessary for this system since PTA was already approved.

Evaluator Signature:

Champan Harris

Date:

04/19/2016
12/08/2016