Privacy Threshold Analysis

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Privacy Threshold Analysis

Date Submitted for Review: 2/20/2026

Name of the Information Technology (IT) System: Platform Hosted Applications (PHA) Professional Standards Training Tracker Tool (PSTTT)

Cyber Security Assessment and Management (CSAM) Identification Number: 1177

Name of Mission Area and Agency: Food, Nutrition and Consumer Services (FNCS)

Name of Program Office: Food and Nutrition Service (FNS)

1. **Describe the system or application and its purpose:**

   The Professional Standards Training Tracker Tool (PSTTT) is an application in the FNCS Platform Hosted Applications (PHA) authorization boundary. PSTTT is a voluntary, web-based tool for State agency professionals and school nutrition professionals to record, track and manage training courses and training hours completed as they meet their annual professional standards training requirements which are mandated by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) of 2010.

2. **Status of system or application:**

   This system is in production.

3. **Does the system collect, process, generate, or store any information that may be considered Personally Identifiable Information (PII)?**

   Yes

   a. **From whom is the PII collected?**

      Members of the public (U.S. citizens), Federal employees and Federal Contractors

   b. **Is the information retrieved by a unique personal identifier?**

      No

   c. **Is the PII shared internally within USDA or externally?**

      PII will be shared internally within USDA

   d. **Does an information sharing agreement exist to cover the external sharing of information?**

      Not applicable

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Personally Identifiable Information

Personally Identifiable Information (PII) is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Identifying Numbers

☐ Social Security number	☐ Truncated or Partial Social Security number	☐ Driver's License number
☐ Passport number	☐ License Plate number	☐ Registration number
☐ File/Case ID number	☐ Student ID number	☐ Federal Student Aid number
☒ Employee Identification number	☐ Alien Registration number	☐ DOD ID number
☐ Professional License number	☐ Taxpayer Identification number	☐ Business Taxpayer Identification number (sole proprietor)
☐ Credit/Debit Card number	☐ Business Credit Card number (sole proprietor)	☐ Vehicle Identification number
☐ Business Vehicle Identification number (sole proprietor)	☐ Personal Bank Account number	☐ Business Bank Account number (sole proprietor)
☐ Personal Device Identifiers or Serial numbers	☐ Business Device Identifiers or Serial numbers (sole proprietor)	☐ Personal Mobile number
☐ Health Plan Beneficiary number	☐ Business Mobile number (sole proprietor)	☐ DOD Benefits number

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Biographical Information

☒ Name (Including Nicknames)	☐ Business Mailing Address (sole proprietor)	☐ Date of Birth (MM/DD/YY)
☐ Ethnicity	☐ Business Phone or Fax Number (sole proprietor)	☐ Country of Birth
☐ City or County of Birth	☐ Group Organization/Membership	☐ Religion/Religious Preference
☐ Citizenship	☐ Immigration Status	☐ Home Phone or Fax Number
☐ Home Address	☐ ZIP Code	☐ Marital Status
☐ Spouse Information	☐ Children Information	☐ Military Service Information
☐ Race	☐ Nationality	☐ Mother's Maiden Name
☐ Personal Email Address	☒ Business Email Address	☐ Global Positioning System (GPS)/Location Data
☐ Employment Information	☐ Alias (Username/Screenname)	☐ Personal Financial Information (Including loan information)
☐ Education Information	☐ Resume or Curriculum Vitae	☐ Business Financial Information (Including loan information)

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☐ Professional/Personal References

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Biometrics

☐ Fingerprints	☐ Hair Color	☐ DNA Sample or Profile
☐ Retina/Iris Scans	☐ Video Recording	

Distinguishing Features

☐ Palm Prints	☐ Eye Color	☒ Signatures
☐ Dental Profile	☒ Photos	

Characteristics

☐ Vascular Scans	☐ Height	☐ Weight
☐ Scars, Marks, Tattoos	☐ Voice/Audio Recording	

Device Information

☐ Device Settings or Preferences (e.g., Security Level, Sharing Options, Ringtones)	☐ Cell Tower Records (e.g., Logs, User Location, Time)	☐ Network Communication Data

Medical /Emergency Information

☐ Medical/Health Information	☐ Mental Health Information	☐ Disability Information
☐ Workers' Compensation Information	☐ Patient ID Number	☐ Emergency Contact Information

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Specific Information/File Types

☐ Personnel Files	☐ Law Enforcement Information	☐ Credit History Information
☐ Health Information	☐ Academic/Professional Background Information	☐ Civil/Criminal History Information/Police Record
☐ Case Files	☐ Security Clearance/Background Check	☐ Taxpayer Information/Tax Return Information

Note: Any officer or employee who knowingly and willfully maintains a system of records without meeting the Privacy Act notice requirements (5 U.S.C. 552a(e)(4)) is guilty of a misdemeanor and may be fined up to $5,000 and be subject to disciplinary action.

4. Does the system use, collect or store Social Security Numbers (SSNs) or Tax Identification Numbers (TINs)? (This includes truncated SSNs/TINs e.g., last 4 digits.)

No

a. Provide the SSN's function within the project and the legal authority to use or collect it. Indicate if there are plans to remediate SSN usage in the future or if the remediation is in process?

Not applicable

5. Is this activity covered under an existing Privacy Impact Assessment (PIA) and Systems of Records Notice (SORN)?

Yes. There is an existing PIA, which is listed below

a. If yes, please identify the PIA and SORN ID in the textbox below.

PIA: CY25 FNCS PHA PSTTT PIA_12-18-2025

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Mission Area Privacy Determination

Title	Name	Signatures
Information System Security Manager	John Rosselot	JOHN ROSSELOT Digitally signed by JOHN ROSSELOT Date: 2026.04.14 15:59:21 -04'00'
Information System Owner	Nita Worley	Nita Worley Digitally signed by Nita Worley Date: 2026.04.14 16:23:22 -04'00'

Note: A Privacy Impact Assessment is required.

Deea Coleman Digitally signed by Deea Coleman Date: 2026.03.12 12:52:36 -05'00' _____Date: _____

Mission Area Privacy Officer
United States Department of Agriculture

TRACY HENDRIX Digitally signed by TRACY HENDRIX Date: 2026.03.12 10:02:22 -04'00' _____Date: _____

Office of the Chief Privacy Officer
United States Department of Agriculture

Template Revisions

Date	Version	Notes
N/A	1.2	No historical information available.

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Date	Version	Notes
02/12/2025	1.3	Removed “Gender” and “Sexual Orientation” from Biographical Information in accordance with Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.”