



Privacy Impact Assessment

for

eFLETC

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Security



Abstract

The Federal Law Enforcement Training Centers (FLETC) has implemented eFLETC as a virtual learning management environment supporting law enforcement training for federal, state, local, tribal, territorial, and international law enforcement officers. eFLETC serves as a scheduling, instructional delivery, and records system for up to 14,000 students. eFLETC automates and integrates processes to improve the efficiency of administrative support functions for online student training and registration, content delivery, and course analytics. FLETC is conducting this Privacy Impact Assessment (PIA) update to clarify the information collected in eFLETC, to include the removal of Social Security numbers (SSN).

Overview

FLETC serves a leadership role as the Federal Government's principal provider of world-class, interagency training of federal law enforcement personnel. FLETC prepares new and experienced law enforcement professionals to fulfill their responsibilities in a safe manner and at the highest level of proficiency. FLETC delivers interagency training with optimal efficiency through government-wide sharing of facilities, equipment, and expertise that produces economies of scale only possible from maintaining a consolidated law enforcement training organization. FLETC has architected and developed eFLETC as an online training delivery capability that provides law enforcement training and education in multiple delivery strategies and modalities.

FLETC provides law enforcement training to over 105 partner organizations. FLETC also trains state, local, tribal, territorial, campus, and international law enforcement officers and agents. The number of agencies attending training, the number of students trained, and the number of student-weeks delivered has steadily increased over the course of FLETC's history. FLETC's collaborative approach with its partner organizations uses research, training, and education in a shared mission of protecting our democratic institutions, ensuring public safety, and preserving law and order. More than 60,000 students are trained annually at FLETC training centers.

FLETC has used eFLETC to become a provider of virtual learning and services for the law enforcement community. eFLETC maintains FLETC student recordation data and personal information required for online training registration and transcription. The system consists of three discrete modules: Learning Management, Media Streaming Service, and Student Registration and Records. These modules are software hosted in a cloud that only contains eFLETC data at a vendor-managed datacenter. All vetted users have access to the Learning Management and Media Streaming Service modules to complete their training requirements. Only eFLETC administrators have access to the Student Registration and Records module.



eFLETC supports FLETC's increasing demand for law enforcement training by providing the ability to respond more quickly to the training needs of its customers with online training materials and courses readily available 24 hours a day, 7 days a week. eFLETC provides online registration capabilities for students and agency representatives. Records contained in eFLETC include schedules for eFLETC training programs and complete student training records. Current students can test online and retrieve their information electronically. Instructors and administrators can schedule classes and training resources, generate class rosters, assign instructors to classes, and assign students to various programs. eFLETC provides FLETC with a means to track the particular training that is provided, identify training trends and needs, schedule training classes and programs, schedule instructors, track training progress by students, assess the effectiveness of training, identify patterns, respond to requests for information related to the training of all eFLETC users, and facilitate the compilation of statistical information about training.

The Learning Management module manages the lifecycle of learning activities for all eFLETC students. It acts as the gateway for learners, trainers, supervisors, and administrators to access training. The Media Streaming module maintains and updates digital audio and video recordings, which can be associated with specific courses or provided as stand-alone informational pieces in the Learning Management module. The Student Registration and Records module maintains and updates user records, training histories, course catalogs, training resources, and training requirements. eFLETC also shares personally identifiable information with FLETC's Student Administration and Scheduling System (SASS).¹

Reason for the PIA Update

FLETC is conducting this Privacy Impact Assessment (PIA) update to clarify the information collected in eFLETC, to include the removal of social security number, date of birth, and gender. Although initially intended to be collected, FLETC never collected social security number, date of birth, and gender. In addition, this Privacy Impact Assessment Update provides more detail on the specific types of training information the system maintains.

There are no other changes to the uses of the data collected, and eFLETC still operates as outlined in the original Privacy Impact Assessment.²

¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, FEDERAL LAW ENFORCEMENT TRAINING CENTERS, PRIVACY IMPACT ASSESSMENT FOR THE STUDENT ADMINISTRATION AND SCHEDULING SYSTEM (SASS), DHS/FLETC/PIA-002 (2013), available at <https://www.dhs.gov/privacy-documents-federal-law-enforcement-training-center-fletc>.

² See U.S. DEPARTMENT OF HOMELAND SECURITY, FEDERAL LAW ENFORCEMENT TRAINING CENTERS, PRIVACY IMPACT ASSESSMENT FOR eFLETC, DHS/FLETC/PIA-003 (2017), available at <https://www.dhs.gov/privacy-documents-federal-law-enforcement-training-center-fletc>



Privacy Impact Analysis

Authorities and Other Requirements

The authority to collect the information in eFLETC remains the same as the original Privacy Impact Assessment: Government Employees Training Act, 5 U.S.C. §§ 4101-4118, as implemented by Executive Order 11348. The same System of Records Notice (SORN) as documented in the original Privacy Impact Assessment continues to apply: DHS/ALL-003 Department of Homeland Security General Training Records³ and DHS/ALL-004 General Information Technology Access Account Records System.⁴ The eFLETC Authority to Operate (ATO) was renewed June 9, 2022. Student records contained within the system are retained for 40 years, in accordance with National Archives and Records Administration (NARA)-approved schedule N1-056-022, dated June 25, 2002

Characterization of the Information

The system collects, generates, and retains the following information to create an individual's account:

- First Name
- Last Name
- Middle Initial
- System-Generated Unique ID
- Office Phone Number
- Agency
- Supervisor Name
- Supervisor Email Address
- Legacy ID (Administrators only)
- Office Email Address
- Mobile Phone Number
- Agency Street Address
- Agency City
- Agency State

³ See DHS/ALL-003 Department of Homeland Security General Training Records, 73 FR 71656 (November 25, 2008).

⁴ See DHS/ALL-004 General Information Technology Access Account Records System, 77 FR 70792 (November 27, 2012).



- Agency Zip Code
- Agency Fax Number
- Home Phone Number

eFLETC also maintains schedules for eFLETC training programs, testing material, class rosters, instructor assignments, digital audio and video recordings, and user records to include training histories, course catalogs, training resources, and training requirements. Given the clarification on the information collected by eFLETC, the risk related to overcollection and mishandling of SPII identified in the original Privacy Impact Assessment is diminished.

Uses of the Information

eFLETC requires personally identifiable information to accurately identify records relating to the student. The original eFLETC Privacy Impact Assessment documented that date of birth and Social Security number were used to identify students. However, this information was never collected by the system, and FLETC uses the student's name and a system-generated unique ID to identify students.

Notice

There are no changes to Notice. This Privacy Impact Assessment Update specifically clarifies what data eFLETC collects. The DHS/ALL-003 Department of Homeland Security General Training Records System of Records Notice (SORN)⁵ also provides notice to the individual. In addition, during the online registration process students receive notice through an electronic Privacy Notice describing why eFLETC is collecting this information.

Data Retention by the Project

There are no changes to Data Retention. Student information is retained for 40 years to ensure records are retrievable throughout the active careers of law enforcement officers trained at FLETC. Student records and training schedules are retained to validate the type, duration, and extent of training provided to law enforcement officers. eFLETC Data Retention provides a way to validate training and experience for purposes of job qualification, obtaining training credit to transfer to colleges and universities, and establishing a student's knowledge base for situations arising in a law enforcement environment outside of training.

Information Sharing

There are no changes to Information Sharing. The sharing of PII outside the Department is part of normal operations and is compatible with the original collection of

⁵ See DHS/ALL-003 Department of Homeland Security General Training Records, 73 FR 71656 (November 25, 2008).



information and the routine uses contained in the published DHS/ALL-003 Department of Homeland Security General Training Records System of Records Notice. Agencies that sponsor students in eFLETC can access eFLETC, based on their system access permissions, to provide and receive information about their students. Students can also access their profiles to access their own information. The primary reasons for sharing include validating training, evaluating the need for further training, and establishing the training level of students for position qualification or educational background.

Redress

There are no changes to Redress. eFLETC provides direct access to users with an active account, and individuals may submit a request in accordance with the Privacy Act and Freedom of Information Act to the FLETC Disclosure Officer. Requests should be directed to:

Federal Law Enforcement Training Centers
FOIA/Privacy Request
1131 Chapel Crossing Road, Building 681
Glynco, Georgia 31524

Inquiries may also be initiated through the FLETC website.⁶

Auditing and Accountability

There are no changes to Auditing and Accountability. FLETC uses technical controls to ensure that information is used in accordance with the stated practices in this Privacy Impact Assessment series. eFLETC uses role-based access controls to limit user's access to information. An individual must have a valid and active eFLETC account to access the system. All eFLETC users (i.e., instructors, system administrators, training support staff) must have both annual privacy and IT security training prior to receiving access to the system. eFLETC also has full audit capability for all data changes in the system.

Responsible Official

Alicia D. Mikuta
Information Management Officer
FLETC
U.S. Department of Homeland Security
Alicia.mikuta@fletc.dhs.gov

⁶ See www.fletc.gov



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Approval Signature

Original, signed copy on file with the DHS Privacy Office.

Deborah Fleischaker
Chief Privacy Officer (A)
U.S. Department of Homeland Security
privacy@hq.dhs.gov