United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

Memorandum

AUG 2 2 2006

To: Assistant Secretaries
Deputy Assistant Secretaries
Heads of Bureaus and Offices

From: W. Hord Tipton
Chief Information Officer

Subject: New Records Management and Privacy Act Computer-based Training

Purpose:

This is to announce two new computer-based training (CBT) modules on "Records Management" and "Orientation to the Privacy Act." The Office of the Chief Information Officer (OCIO) developed these standard Department-wide courses that will be available through the Department of the Interior's (DOI) enterprise-wide Learning Management System, DOI Learn. Records Management and Privacy Act training is required by Federal statute and Departmental regulation identified in Attachment I. The two training courses are meant to assist DOI bureaus and offices in meeting their statutory and regulatory training requirements for employees, contractors, partners, and volunteers within their oversight.

In addition, in the spirit of Secretary Kempthorne's memorandum dated June 20, 2006, on safeguarding personally identifiable information, understanding the requirements regarding information is necessary in order to be good stewards of the information entrusted to the Department. As the Secretary stated in his memorandum, this responsibility is expected of all DOI employees, contractors, volunteers, and any others who collect, access, maintain, use, or make decisions using this information.

Background:

The completion of each CBT should take approximately one hour. Although the two CBTs will be issued together, separate completion certificates will be issued for each course. In order to receive a certificate for each course, users will need to obtain a passing score on the testing provided. Those taking the training will have the option of going through part of the course and taking the remainder at a later time.

These CBT modules use the same software used for the Annual End-User Federal Information Systems Security Awareness Training. The same minimum workstation configuration required for Security Awareness Training will be required for these new CBTs. Refer to the memorandum from the OCIO dated May 26, 2006, on "Supplement to the Fiscal Year 2006 Annual End-user Security Training," that is available at http://www.mydoi.doi.net/ocio/imd/ocio_privacy_training.html.

DOI Learn Managers for each bureau (see Attachment II) will collaborate with the managers to ensure that their employees, contractors, partners and volunteers complete Records Management and Privacy Act training and are given their logon credentials and instructions for using DOI Learn. Managers must first obtain accounts for contractors, partners and volunteers under their oversight by providing certain information to the DOI Learn Managers. Systems at some locations may not be adequate to handle the training on-line. Your bureau training staff will coordinate with your IT staff to provide CD-ROMs to employees without Internet access or make the information available on your intranet.

Scope:

As a result of the requirements in Attachment I, managers are urged to ensure that employees, contractors, partners, and volunteers who have access to DOI records complete Records Management and Privacy Act training. Information on these persons must be submitted to the DOI Learn Managers in each bureau and office in order to provide accurate reporting to the Office of Management and Budget and other offices when needed.

Due Dates:

DOI offices and bureaus already have recorded over 11,000 completions of these CBT's to date due to bureaus and offices that have established this training as mandatory during the pilot testing phase. We are confident that DOI will reach 100% compliance by September 29, 2006. Those completions prior to this memorandum will be valid for CY 2006 reporting. Persons who have taken the training will retake the training before the one-year anniversary of their previous year completion. This will help to ensure a continued 100% completion each year. New employees, contractors and others must complete the training within 45 days of entry.

Contacts:

If you have any questions concerning this directive please contact Marilyn Leginini at (202) 219-0868 or via email at marilyn_legnini@ios.doi.gov. Staff may contact their bureau DOI Learn Managers (identified in Attachment II).

Attachment I: Background on Training Compliance
Attachment II: Bureau DOI Learn Managers

cc: Bureau and Office Chief Information Officers
Departmental Records Managers
Departmental Privacy Officers
Departmental Contracting Officers

Attachment I

Background on Training Requirements

The Federal Records Act (FRA) and Code of Federal Regulations requires that agencies: "ensure that adequate training is provided to all agency personnel on policies, responsibilities, and techniques for the implementation of recordkeeping requirements and the distinction between records and non-record materials, regardless of media, including those materials created by individuals using computers to send or receive electronic mail" (36 CFR 1222).

The Privacy Act of 1974 requires that agencies: "establish rules of conduct for persons involved in the design, development, operation, or maintenance of any Privacy Act system of records, or maintaining any record, and instruct each such person with respect to such rules and the requirements of this section, including any other rules and procedures adopted pursuant to this section and the penalties for noncompliance" (5 U.S.C. 552a(e)(9)).

According to Departmental Privacy Act regulations, "bureaus responsible for a [Privacy Act] system of records shall be responsible for assuring that employees with access to the system are made aware of the requirements of this section and of 5 U.S.C. 552a(i)(1).... (43 CFR 2.52 (d)).

Contractors managing Privacy Act system of records are also required to comply with Privacy Act requirements. Section 5 U.S.C. 552a(m) of the Privacy Act states that when an agency provides by a contract for the operation by or on behalf of the agency of a system of records to accomplish an agency function, the agency shall, consistent with its authority, cause the requirements of this section to be applied to such system. For purposes of subsection (i) of this section any such contractor and any employee of such contractor, if such contract is agreed to on or after the effective date of this section, shall be considered to be an employee of an agency.

Federal Acquisition Regulations (FAR) (FAR 24.103.3) require that contracting officers, among other things, make available, in accordance with agency procedures, agency rules and regulation implementing the Privacy Act.

Attachment II

Bureau DOI Learn Managers

Bureau	DOI Learn Manager	Phone	e-mail
FWS	Pat Houghton	304-876-7267	Pat_Houghton@fws.gov
BLM	Ron Tucker	602-906-5610	Ron_Tucker@blm.gov
USGS	Melanie Hood	303-202-4148	mkhood@usgs.gov
OSM	Judith Blowe	202-208-2552	jblowe@osmre.gov
OS	Marta Kelly	202-208-6755	Marta_kelly@ios.doi.gov
MMS	Cheryl Callahan	703-787-1808	cheryl.callahan@mms.gov
BOR	Norma Martinez	303-445-2763	nmartinez@do.usbr.gov
NPS	Paula Molloy	202-354-1412	paula_molloy@nps.gov
BIA	Patti MacLeod	202-208-2893	Patti MacLeod & Beth_Terranova@ios.doi.gov Fax: 202-219-2432
OST	Thomas Bird Bear	505-816-1322	Fax: 505-816-1375
NBC	Robert Veltkamp	202-208-3441	Robert_J_Veltkamp@nbc.gov