

Data Stewardship Executive Policy Committee

DS-017 - Data Stewardship Awareness Training

PURPOSE

Census Bureau employees and individuals with Special Sworn Status are data stewards with the responsibility to protect the confidentiality and privacy of information that is entrusted to them. This means that data and information are handled appropriately, as authorized, and in compliance with relevant laws. The Data Stewardship Awareness Training is mandatory and required to be taken annually. Data Stewardship Awareness training includes IT Security Awareness, Title 13 and Privacy Act responsibilities to reinforce the Census Bureau's strict confidentiality and privacy standards, and how those standards apply to everyday work life. This policy documents basic requirements surrounding implementation of the course, including penalties for not completing the annual training.

BACKGROUND

While Data Stewardship Awareness Training has been mandatory for several years recent audits have shown that the Census Bureau does not achieve 100% compliance in completion of this training. These audit groups have reported non-compliance with this required training to the DOC Office of the Inspector General, the IRS, and GAO. Non-compliance lessens the capability for the Census Bureau to present a strong data stewardship posture in its handling of sensitive data. This policy strengthens the penalties for non-compliance with the training requirement.

SCOPE

This policy covers all employees and contractors that support the Census Bureau or access any data protected under Title 13 U.S.C., Title 5, CIPSEA, and the E-Government Act.

POLICY

All new Census employees and special sworn status (SSS) individuals are required to complete the Data Stewardship Awareness Training prior to or during New Employee Orientation (NEO) and to complete the regular training requirement in the LMS annually thereafter. Training compliance is tracked in the Commerce Business Systems ETMIS+ to ensure course completion. Beginning in FY2013 individuals who do not complete the course by the last business day in June each year will have their network access disabled until they provide proof that they have completed the training.

EFFECTIVE DATE

Upon signature

LEGAL AUTHORITIES

The Census Bureau's legal authority is Title 13, U.S.C. The Data Stewardship Awareness Training provides awareness and a basic understanding of the confidentiality aspects of Title 13 U.S.C., the Oath of Nondisclosure, the Privacy Principles, and the Unauthorized Browsing Policy.

Other laws that cover privacy and confidentiality at Census are Title 5, which includes the Privacy Act of 1974, the E-Government Act of 2002, federal laws such as the Confidential Information Protection & Statistical Efficiency Act (CIPSEA), and Title 26.

The Federal Information Security Management Act (FISMA), Title III of the E-Government Act of 2002 requires all personnel with access to IT resources take security awareness training annually.

IMPLEMENTATION

Overall Responsibility

The responsibility for ensuring the course is updated with current information lies with the Policy Coordination Office (PCO) and the Office of Information Security (OIS). Responsibility for hosting the delivery of the course lies with the Human Resources Division (HRD). Responsibility for implementation of this policy lies with PCO and OIS. More specific responsibilities are outlined below. An implementation guide will detail tasks, procedures, and responsibilities for full implementation.

Division/Office Chief Responsibility

Division/Office Chiefs have primary responsibility for ensuring all employees complete the course annually, by the end of the fiscal year (September 30). All managers are responsible for allowing time for their staff to complete the course. HRD and Division/Office Chiefs will be able to issue/generate reports to track training completion status for employees and SSS personnel.

Census Headquarters Employees

Data Stewardship Awareness Training is provided to new employees during NEO. Training is provided by PCO and OIS via a lecture and paper. After orientation, PCO updates the training status for new employees in the CBS ETMIS+ system and these employees are compliant for the current fiscal year. Employees are responsible for completing the training annually thereafter in the LMS.

Special Sworn Status (SSS) Individuals

The Census Clearance Contractor Processing Branch (CCPB) provides all SSS individuals who will have IT access with the link to the Data Stewardship Awareness Training and notifies them of their responsibility to complete the computer-based training (CBT) before reporting to work. The Census CCPB then faxes the scanned signed certificate to PCO for entry into CBS ETMIS+. SSS individuals are responsible for completing the training annually thereafter in the LMS.

Certain SSS individuals that have access to titled data, but do not require IT access to Census Bureau systems, i.e. university researchers, are required to take training via paper.

SSS individuals who do not need access to the IT network and do not work with titled

information such as cafeteria workers, guards, cleaning crews, etc., receive training via a pamphlet.

National Processing Center (NPC)

Census employees at NPC complete training in the same manner as Headquarters employees. The NPC Training Office provides new employees with a hard copy of the Data Stewardship Awareness training to read and sign during orientation. Completion status is updated in CBS ETMIS+. Annually thereafter, training is completed through the LMS. The NPC Office of Security also provides a hard copy to new SSS individuals to read and sign and works with the NPC Training Office or the NPC Contractor's Office to update completion status into CBS ETMIS+. Annually thereafter, training is taken through the LMS.

Field Division (FLD)

FLD follows a standard Data Stewardship Awareness Training process by sending information on this requirement to the Regional Offices (RO). ROs are responsible for notifying the Field Representatives (FRs) that report to them. FLD ensures FRs take the training through the LMS and completion is tracked in the CBS ETMIS+ system. FLD will establish an equitable method for funding the cost for FRs to complete the course.

Implementation and Awareness Strategies

PCO is responsible for updating the training content each year. HRD maintains the contract with the LMS vendor and is responsible for ensuring individuals are registered for the training in the LMS. PCO and OIS Chiefs will brief Division/Office Chiefs prior to training rollout each year to discuss issues regarding implementation. Both offices will use additional outreach methods such as flyers or events to create awareness.

Training Noncompliance

The Chief Information Security Officer/Office Chiefs will work with the LAN Technology Support Officer (LTSO) to disable computer access for those found to be noncompliant. LTSO will supply a centralized workstation for those who must complete the course to regain access. Any employee whose access is suspended must contact LTSO to schedule training completion on the workstation. These individuals will print out their completion certificates and PCO will enter the data into the CBS ETMIS+ system. PCO and OIS Chiefs will work with LTSO to enable the users upon proof of training completion.

POLICY OWNER

Data Stewardship Executive Committee

SIGNATURE



Deputy Director, U.S. Census Bureau

5/17/13
Date Signed

Summary Information	
Policy Title:	DS017 Data Stewardship Awareness Training
Date Signed:	
Policy Owner:	Data Stewardship Executive Policy Committee (DSEP)
Office Responsible for Implementation:	PCO and OIS
Office Responsible for Dissemination:	PCO
Stakeholder Vetting:	PCO, OIS, FLD, HRD