Privacy Threshold Analysis
for the
CEN11 Demographic, Surveys, and Special Processing
U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau

Unique Project Identifier: 006-000400500

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose: Provide a general description of the information system in a way that a non-technical person can understand.

The E-Government Act of 2002 defines “information system” by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: “Information system” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44 U.S.C. § 3502(8).

a) Whether it is a general support system, major application, or other type of system

General Support System

b) System location

U.S. Census Bureau

c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)

Standalone System

d) The purpose that the system is designed to serve

These applications provide users with the ability to develop, collect, analyze, model and disseminate demographic data

e) The way the system operates to achieve the purpose

The Demographic Directorate directs U.S. Census Bureau programs on the United States population and its characteristics, income and poverty, health insurance coverage, and housing, along with gathering international demographic and economic data.
f) A general description of the type of information collected, maintained, use, or disseminated by the system

The U.S. Census Bureau's CEN11 Demographic, Surveys, and Special Processing System is a system comprised of a collection of application components that support the Demographic Directorate business functions.

g) Identify individuals who have access to information on the system

The Demographic Directorate

h) How information in the system is retrieved by the user

Data is received from within the U.S. Census Bureau through listing and interviewing activities obtained through field data collection. These data are sent back out to the field, via this system, on sample control files.

i) How information is transmitted to and from the system

The Demographic Directorate has its own data processing system that allows staff to calculate, process and manipulate the statistical data input for the purpose of creating statistical information and reports for internal and external consumption.
Questionnaire:

1. What is the status of this information system?

____ This is a new information system. *Continue to answer questions and complete certification.*

____ This is an existing information system with changes that create new privacy risks. *Complete chart below, continue to answer questions, and complete certification.*

<table>
<thead>
<tr>
<th>Changes That Create New Privacy Risks (CTCNPR)</th>
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<tbody>
<tr>
<td>a. Conversions</td>
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<tr>
<td>b. Anonymous to Non-Anonymous</td>
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<td>c. Significant System Management Changes</td>
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<td>d. Significant Merging</td>
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<tr>
<td>e. New Public Access</td>
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<td>f. Commercial Sources</td>
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<td>g. New Interagency Uses</td>
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<tr>
<td>h. Internal Flow or Collection</td>
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<tr>
<td>i. Alteration in Character of Data</td>
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<tr>
<td>j. Other changes that create new privacy risks (specify):</td>
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</tbody>
</table>

____ This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*

X____ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or later). *Skip questions and complete certification.*

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

NIST Special Publication 800-53 Revision 4, Appendix J, states “Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary.” Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

____ Yes. *Please describe the activities which may raise privacy concerns.*

X____ No

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations but includes any records [or information] in which the submitter has a commercial interest and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."
Yes, the IT system collects, maintains, or disseminates BII about: (Check all that apply.)

Companies
Other business entities

No, this IT system does not collect any BII.

4. Personally Identifiable Information

4a. Does the IT system collect, maintain, or disseminate personally identifiable information (PII)?

As per OMB 07-16, Footnote 1: "The term 'personally identifiable information' refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc... alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc..."

Yes, the IT system collects, maintains, or disseminates PII about: (Check all that apply.)

DOC employees
Contractors working on behalf of DOC
Members of the public

No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate PII other than user ID?

Yes, the IT system collects, maintains, or disseminates PII other than user ID.

No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4c. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.
___ Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

X___ No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

*If any of the answers to questions 2, 3, 4b, and/or 4c are “Yes,” a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the approved PLA must be a part of the IT system’s Assessment and Authorization Package.*
CERTIFICATION

X I certify the criteria implied by one or more of the questions above apply to the CEN11 Demographic, Surveys, and Special Processing system and as a consequence of this applicability, I will perform and document a PIA for this IT system.

I certify the criteria implied by the questions above do not apply to the [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO): Jeffrey Sisson

Signature of SO: ____________________________ Date: 5/9/2019

Name of Chief Information Security Officer: Jeffery Jackson

Signature of CISO: ____________________________ Date: 6/27/19

Name of Business Authorizing Official (BAO): Victoria Velkoff

Signature of BAO: ____________________________ Date: 6/27/19

Name of Technical Authorizing Official (TAO): Kevin Smith

Signature of TAO: ____________________________ Date: 6/24/19

Name of Bureau Privacy Officer (BPO): Byron Crenshaw

Signature of BPO: ____________________________ Date: 7/30/19