Privacy Threshold Analysis
for the
CEN21 Human Resources Applications
U.S. Department of Commerce Privacy Threshold Analysis  
U.S. Census Bureau CEN21 Human Resources Applications

Unique Project Identifier: 006-000403600

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 on 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 and its purpose 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).

1. Whether it is a general support system, major application, or other type of system
   Major Applications

2. System location
   Housed in the Bowie Computing Center

3. Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)
   The components within CEN21 share information with the Department of Homeland Security (DHS), the Department of the Treasury, the FBI, OPM, NFC, several external Vendors and other Census Bureau systems.

4. The purpose that the system is designed to serve
   The information collected/maintained by the CEN21 IT systems are used by the Application Development & Services Division (ADSD) via several Human Resource (HR) applications to process HR, employee health, and payroll data for applicants and personnel related to Census permanent employees, Schedule A employees, and the Decennial Census employee workforce.

5. The way the system operates to achieve the purpose
   The databases and applications within CEN21 provide searchable access to records by various elements (e.g., employee name and address).
6. A general description of the type of information collected, maintained, use, or disseminated by the system
CEN21 components assist in tracking the hiring process, employee awards, employee personnel actions, employee health records, payroll, and tax calculations.

7. Identify individuals who have access to information on the system
Applicant background information is verified through system connections to users at the Office of Personnel Management (OPM), the Department of the Treasury, and the Federal Bureau of Investigation (FBI). After receiving the information, the FBI sends the Census Bureau a confirmation of receipt. Earnings statements and reports are transmitted to the Department of the Treasury.

8. How information in the system is retrieved by the user
HTTPS, SFTP, PRIVATE DBLINKS

9. How information is transmitted to and from the system
HTTPS, SFTP, PRIVATE DBLINKS

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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<tr>
<td>c. Significant System Management Changes</td>
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<tr>
<td>d. Significant Merging</td>
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<tr>
<td>e. New Public Access</td>
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<tr>
<td>f. Commercial Sources</td>
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<tr>
<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>
</tr>
</tbody>
</table>

   ___ This is an existing information system in which changes do not create new privacy risks. 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 PHI, 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

___ X 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."

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

___ X BOC employees

___ X Contractors working on behalf of BOC

___ X 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?

_X_ 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 PIA 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 CEN21 Human Resources Applications 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): David Peters

Signature of SO: [Signature]

Date: 5/3/18

Name of Chief Information Security Officer (CISO): Tim Ruland

Signature of CISO: [Signature]

Date: 5/15/18

Name of Authorizing Official (AO): Kevin Smith

Signature of AO: [Signature]

Date: 5/15/18

Name of Authorizing Official (AO): David Ziaya

Signature of AO: [Signature]

Date: 5/25/18

Name of Bureau Privacy Officer (BPO): Byron Crenshaw

Signature of BCPO: [Signature]

Date: 5/29/18