

**U.S. Department of Commerce  
U.S. Census Bureau**



**Privacy Threshold Analysis  
for the  
Qualtrics,  
Cloud Based Survey Software**

## U.S. Department of Commerce Privacy Threshold Analysis

### U.S Census Bureau, Cloud Based Survey Software

**Unique Project Identifier:** [Number]

**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).

The Center for Survey Measurement (CSM) employs a variety of qualitative research methods, including cognitive interviews, usability testing and focus groups to test new materials and methods as well as to understand public perceptions of the work the Census Bureau is doing. CSM needs a cloud-based subscription survey software to allow for collection of information to support CSM activities.

The contractor must provide a subscription to the cloud-based subscription survey software for five (5) Census Bureau users and allow for up to 50,000 responses (cumulative) for one year.

The Census Bureau may have a need to increase the number of users/seats and the number of responses to be collected. The contractor may propose pricing for additional users/seats and an increased number of responses (optional service).

(a) *Whether it is a general support system, major application, or other type of system*  
Other – software as a service, research tool

(b) *System location*  
Amazon Gov Cloud located in Oregon

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

Stand-alone4

(d) *The purpose that the system is designed to serve*

The information collected in this program of developing and testing questionnaires will be used by staff from the Census Bureau to evaluate and improve the quality of the data in the surveys and censuses that are ultimately conducted.

*(e) The way the system operates to achieve the purpose*

This system will serve as a research data collection tool to evaluate and improve the Census Bureau's online services and to measure employee and customer satisfaction. The tool will be programmed by Census Bureau staff and sent to sampled members of the public, employees or customers for data collection. We will be able to:

- Create, test, and modify surveys
- Apply flow logic to surveys with advanced branching and display logic,
- Use a variety of question types,
- Embed data (either pre-existing from an input file or from previous survey questions),
- Ability to implement survey quotas,
- Mobile and offline compatibility,
- Randomization within question, between questions and between survey instruments.

*(f) A general description of the type of information collected, maintained, use, or disseminated by the system*

The types of information that will be used by Qualtrics is General Personal Data and Work Related Data PII. The information collected in this program of developing and testing questionnaires will be used by staff from the Census Bureau to evaluate and improve the quality of the data in the surveys and censuses that are ultimately conducted.

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

General public will have access to enter their own data only. They will not have access to other respondents' data. The contractor will provide access to five (5) Census Bureau users for the purpose of programming multiple surveys and collecting up to 50,000 responses for one year. General public access is for input only.

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

Data access depends on user type. If the user has access to the data, they can retrieve the data based on any of the characteristics collected in the data.

*(i) How information is transmitted to and from the system*

Respondents submit data using HTTPS (TLSv1.2 with AES 128/256 depending on the browser) to the front-end web server (typically *customername.qualtrics.com*).

Data are processed by application servers and sent to database servers for storage. Web data are delivered to the Respondent in the form of survey questions, graphics, and other content created in the survey design. Some surveys are restricted by password or location, as setup by the survey creator. This multi-tiered architecture has multiple layers of hardware and software security to ensure that no device/user can be inserted into the communication channel.

For high availability and speed, base code and static images/docs are stored in the cloud and delivered to Users as efficiently as possible using cache and location information.

Users access the Qualtrics platform with login credentials using a web browser. Customers may choose to authenticate by linking their single sign-on (SSO) system to Qualtrics' Services. Brand Administrators have full control over Users and the password policy.

**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.*

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

- 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.*
- 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.*

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.

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 Qualtrics 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): Jennifer Hunter Childs \_\_\_\_\_

Signature of ISSO or SO: **JENNIFER CHILDS** Digitally signed by JENNIFER CHILDS  
Date: 2018.06.25 10:10:59 -04'00' Date: \_\_\_\_\_

Name of Chief Information Security Officer (CISO): Timothy Ruland \_\_\_\_\_

Signature of CISO: **TIMOTHY RULAND** Digitally signed by TIMOTHY RULAND  
Date: 2018.06.26 07:41:53 -04'00' Date: \_\_\_\_\_

Name of Authorizing Official (AO): Kevin Smith \_\_\_\_\_

Signature of AO: *Kevin Smith* Date: 8-29-18

Name of Authorizing Official (AO): John Eltinge \_\_\_\_\_

Signature of AO: *[Handwritten Signature]* Date: 9/4/2018

Name of Bureau Privacy Officer (BPO): Byron Crenshaw \_\_\_\_\_

Signature of BPO: *Byron Crenshaw* Date: 9/5/2018