Privacy Threshold Analysis
for the
Information Technology Center (ITC) NOAA1101
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:
The NOAA1101 General Support System (GSS), located at 1221 Caraway Court; Suite 1020; Largo, Maryland 20774, is an interconnected set of information resources under the management and control of Service Delivery Division (SDD) within the NOAA Office of the Chief Information Officer (CIO). The NOAA1101 GSS includes hardware, software, information, data, applications, communications, facilities, and people.

NOAA1101 GSS provides Infrastructure As A Service (IAAS), Data Center colocation, and Application Support services that are instrumental to obtaining the objectives of the President's Management Agenda; achieving the goals of the Office of Management and Budget for effective and efficient Government; and NOAA's goal for excellence in the technical operational support of NOAA's financial, management, and administrative systems. Support activities of the GSS include direct, technical, and operational support of financial and administrative systems.

The NOAA1101 GSS boundary encompasses the NOAA instance of Commerce Business System (CBS), CBS Support Systems, Grants Online (GOL), the Economic Development Administration’s (EDA’s) Revolving Loan Fund Management System (RLFMS) and Operations Planning and Control System (OPCS); and various other minor administrative and management applications.

The NOAA1101 GSS includes multiple interconnections with various NOAA line/staff offices such as The National Weather Service; NOAA Fisheries; and The Office of Law Enforcement. Interconnections with other government agencies and external entities also exist. These include: the US Department of the Treasury, US Department of Agriculture (USDA); Commercial Banking Institutions such as JP Morgan-Chase/MasterCard; and Carlson Wagonlit Travel (CWT) SatoTravel.

The CBS and GOL systems are documented as subsystems within NOAA1101 and are identified as FISMA children of the GSS.
The NOAA1101 GSS has been identified as a High Value Asset by the DOC Office of Cyber Security due to the Critical Systems Management Information it contains. The operational support of these systems is a critical factor in the functionality and benefit of these systems to NOAA employees and consequently to the achievement of NOAA's mission.
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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<tr>
<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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<td>j. Other changes that create new privacy risks (specify):</td>
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___ 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). Continue to answer 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.)."

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

- X Companies
- X 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...”

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

- X DOC employees
- X Contractors working on behalf of DOC
- 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 NOAA1101 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 NOAA1101 and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO): Joseph C. Smith III

Signature of ISSO or SO: ____________________________ Date: 4/3/2018

Name of Information Technology Security Officer (ITSO): Jean Apedo

Signature of ITSO: ____________________________ Date: ___________

Name of Authorizing Official (AO): Doug Perry

Signature of AO: ____________________________ Date: ___________

Name of Co-Authorizing Official (AO): Kim Darling

Signature of AO: ____________________________ Date: ___________

Name of Bureau Chief Privacy Officer (BCPO): Mark Graff

Signature of BCPO: ____________________________ Date: ___________