

**U.S. Department of Commerce
NOAA NMFS**



**Privacy Impact Assessment
for
NOAA4100 - Greater Atlantic Regional Office (GARFO) Network**

Reviewed by: Mark Graff, Bureau Chief Privacy Officer

- Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
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Date

U.S. Department of Commerce Privacy Impact Assessment NOAA4100 - Greater Atlantic Regional Office (GARFO) Network

Unique Project Identifier: NOAA4100

Introduction: System Description

The Greater Atlantic Regional Fisheries Office Local Area Network (LAN) Infrastructure (System NOAA4100) is one of the National Oceanic & Atmospheric Administration's (NOAA) general support system (GSS). A GSS is an interconnected information resource under the same direct management control that shares common functionality. The Greater Atlantic Regional Fisheries Office (GARFO) maintains several National Marine Fisheries Service's (NMFS) main host application and web servers. The computer systems within GARFO provide service to our ultimate end beneficiaries, the habitat, the fish, and the environment; and to the biologists, scientists, statisticians, and economists within the region and nation; and all fishers who depend on our data.

Part of this data is Permit data which consists of contents of permit applications and related documents, such as permit transfers and percentage of ownership in a corporation. A typical transaction is an initial or renewal permit application: the permit holder or applicant completes an application downloaded from the GARFO Web site, submits it to the applicable office by mail, along with any required supporting documentation and/or required fee payment, and receives a new permit once approved by NMFS. For permit transfers within a family, marriage certificates, divorce decrees, and/or death certificates may be required.

GARFO also collects and maintains PII for the following administrative support purposes:

1. For employment onboarding process and HR administration: SSN, Employee ID, Financial Account, Date of Birth, Driver's License, Passport, Alias, Gender, Age, Race, Home Address, Military Service, Occupation, Job title, Work History, Salary, Performance Plans, Fingerprints.
2. For Establishing Employee IT system user accounts: Name, Office, Government phone number, email address, supervisor.

GARFO collects and maintains BII as part of dealer data through the Atlantic Coastal Cooperative Statistics Program (ACCSP), which is a public organization. This process was implemented approximately 12 years ago. Information collected is for reporting of trip data and catch landings. Information collected for these applications are: Vessel Owner Name, Name of Vessel, Permit Number, Vessel Owner Date of Birth, Trip information, Catch Species, Catch Weight.

Information sharing: GARFO Employee PII is available only to the IT Staff and HR staff which is authorized to handle it.

Permit information is shared within NMFS offices, in order to coordinate monitoring and management of sustainability of fisheries and protected resources. Sources of information include the permit applicant/holder, other NMFS offices, the U.S. Coast Guard, the Northeast Fishery Management Council (NEFMC) and the Mid-Atlantic Fishery Management Council (MAFMC).

Permits BII is shared with State Fish and Game. The information (data for issuing fishing permits and permit histories, catch data collected from fishing vessels, landings data collected from fish dealers, and effort or catch based allocation data) shared within NMFS and State Fish and Game is to support both our missions and theirs. The *Department of Fish & Game* works to preserve the state's natural resources and people's right to conservation of those resources, as protected by Article 97 of the Massachusetts Constitution. This includes civil and criminal law enforcement. The Department exercises responsibility over the Commonwealth's marine and freshwater fisheries, wildlife species, plants, and natural communities, as well as the habitats that support them.

The information listed above is also shared with:

The Northeast Fisheries Sciences Center (NEFSC), since we both share some fisheries management responsibilities in the same regional area, much of our data collection, data analysis, and data dissemination roles either overlap or complement each other.

The Southeast Regional Office, as there is overlap in vessel activity with the Southeast Region, with vessels operating in both regions.

The Northeast Fishery Management Council (NEFMC) and the Mid-Atlantic Fishery Management Council (MAFMC) for the purpose of co-managing a fishery or for making determinations about eligibility for permits when state data are all or part of the basis for the permits. for purposes of data analysis. These MSA authorized fisheries management organizations have teams of analysts who use GARFO data to help drive fisheries management decision making.

The NEFMC and MAFMC and the North Atlantic Fisheries Organization for the purposes of identifying current permit owners and vessels pursuant to applicable statutes or regulations and/or conservation and management measures.

The Office of Law Enforcement for purposes of civil and criminal investigation and enforcement.

The Atlantic Coastal Cooperative Statistics Program (ACCSP). ACCSP is a critical data management partner to GARFO. Currently they are the data collection point for all federally

permitted dealers, and the future vision is to make them the collection point for all federally managed vessels. Data exchanges between GARFO and ACCSP have been integral to fisheries management for many years.

State fishery managers of the Atlantic Coastal States of Maine, Massachusetts and Rhode Island, because there is overlap with state management, and some federal fish activity reporting requirements overlap with what these states require.

Reciprocal information (data for issuing fishing permits and permit histories, catch data collected from fishing vessels, landings data collected from fish dealers, and effort or catch based allocation data) sharing occurs with the Army Corps of Engineers, for support of environmental assessment

The public: Vessel Owner Name, Name of Vessel and Permit Number are made publically available through our website. Notice of this is given on the permit application. We also allow other regions, centers and state organizations access to the publically available information directly from our database through a secure connection. This information is considered part of the public domain.

The applicable System of Records Notice for the permits PII and BII in NOAA4100 is: COMMERCE/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries.

Contractor Roles: Contractors work in IT and as researchers. Those in IT and in research positions have elevated privileges to the extent required to do their job.

Authorities for information collection: Applications for permits and registrations are collected from individuals under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, the High Seas Fishing Compliance Act, the American Fisheries Act, the Tuna Conventions Act of 1950, the Atlantic Coastal Fisheries Cooperative Management Act, the Atlantic Tunas Convention Authorization Act, the Northern Pacific Halibut Act, the Antarctic Marine Living Resources Convention Act, the Western and Central Pacific Fisheries Convention Implementation Act (WCPFCIA; 16 U.S.C. 6901 *et seq.*), international fisheries regulations regarding U.S. Vessels Fishing in Colombian Treaty Waters, the Marine Mammal Protection Act, the Endangered Species Act and the Fur Seal Act. The authority for the mandatory collection of the Tax Identification Number is 31 U.S.C. 7701.

5 U.S.C. § 301 authorizes the operations of an executive agency, including the creation, custodianship, maintenance and distribution of records.

The Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C 1801 *et seq.* authorizes the collection of information for the purposes of maintaining sustainable fisheries.

This is a moderate impact system.

Section 1: Status of the Information System

1.1 Indicate whether the information system is a new or existing system.

- This is a new information system.
- This is an existing information system with changes that create new privacy risks. *(Check all that apply.)*

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 with no changes that create new privacy risks.

Section 2: Information in the System

2.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. *(Check all that apply.)*

Identifying Numbers (IN)					
a. Social Security*	X	e. File/Case ID	X	i. Credit Card	
b. Taxpayer ID	X	f. Driver's License	X	j. Financial Account	X
c. Employer ID	X	g. Passport	X	k. Financial Transaction	X
d. Employee ID	X	h. Alien Registration		l. Vehicle Identifier	
m. Other identifying numbers (specify): Captain's license, State and Federal Dealer Numbers (if applicable), vessel identification number, permit or license numbers for Federal or state permit/licenses issued and start and end dates and other permit status codes, vessel registration number					
*Explanation for the need to collect, maintain, or disseminate the Social Security number, including truncated form: SSN is collected for purposes of identification and administration of individuals employed at GARFO.					
Tax Identification Numbers (SSNs or Employer ID Numbers) allow positive identification for cost recovery billing of IFQ holders. Also, as stated in both SORNs' routine uses, a Tax Identification Number is required on all permit applications other than research or exempted fishing permits, under the authority 31 U.S.C. 7701. For purposes of administering the various NMFS fisheries permit and registration programs, a person shall be considered to be doing business with a Federal agency including, but not limited to, if the person is an applicant for, or recipient of, a Federal license, permit, right-of-way, grant, or benefit payment administered by the agency or insurance administered by the agency pursuant to subsection (c) (2) (B) of this statute.					

General Personal Data (GPD)					
a. Name	X	g. Date of Birth	X	m. Religion	
b. Maiden Name		h. Place of Birth		n. Financial Information	X
c. Alias		i. Home Address	X	o. Medical Information	X
d. Gender	X	j. Telephone Number	X	p. Military Service	X
e. Age	X	k. Email Address	X	q. Physical Characteristics	X
f. Race/Ethnicity	X	l. Education	X	r. Mother's Maiden Name	
s. Other general personal data (specify): Permit applicant, permit holder, permit transferor/transferee, vessel owner, vessel operator, dealer applicant, dealer permit holder, spouse, former spouse, decedent.					

Work-Related Data (WRD)					
a. Occupation	X	d. Telephone Number	X	g. Salary	X
b. Job Title	X	e. Email Address	X	h. Work History	X
c. Work Address	X	f. Business Associates			
i. Other work-related data (specify): Vessel name, vessel length overall. Name of corporation, state and date of incorporation of business and articles of incorporation.					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints		d. Photographs	X	g. DNA Profiles	
b. Palm Prints		e. Scars, Marks, Tattoos		h. Retina/Iris Scans	
c. Voice Recording/Signatures		f. Vascular Scan		i. Dental Profile	
d. Other distinguishing features/biometrics (specify): Signature on form, Height, weight, hair and eye color, medical records for permit disputes					

System Administration/Audit Data (SAAD)					
a. User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	
b. IP Address	X	d. Queries Run	X	f. Contents of Files	
g. Other system administration/audit data (specify):					

Other Information (specify) Species, aggregate catch data and statistics, quota share balance, quota pound balance, quota pound limits, listings of endorsements and designations (i.e., gear endorsement, size endorsement, sector endorsement, permit tier) associated with the permit, name of physical IFQ landing site, Exemptions (i.e., Owner on Board - Grandfathered Exemption, Owner on Board, as stated in code of federal regulations) and exemption status, contact persons, Catch/Observer Discard Data, Quota Share/Quota Pound Transfer Data, Business Operation Information (Business Processes, Procedures, Physical Maps).					
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2.2 Indicate sources of the PII/BII in the system. (Check all that apply.)

Directly from Individual about Whom the Information Pertains					
In Person	X	Hard Copy: Mail/Fax	X	Online	X
Telephone	X	Email			
Other (specify):					

Government Sources

Within the Bureau	X	Other DOC Bureaus		Other Federal Agencies	X
State, Local, Tribal	X	Foreign			
Other (specify)					

Non-government Sources					
Public Organizations	X	Private Sector		Commercial Data Brokers	
Third Party Website or Application					
Other (specify): ACCSP Dealer Data collection					

2.3 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. *(Check all that apply.)*

Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)			
Smart Cards		Biometrics	
Caller-ID		Personal Identity Verification (PIV) Cards	
Other (specify):			

X	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
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Section 3: System Supported Activities

3.1 Indicate IT system supported activities which raise privacy risks/concerns. *(Check all that apply.)*

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

X	There are not any IT system supported activities which raise privacy risks/concerns.
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Section 4: Purpose of the System

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. *(Check all that apply.)*

Purpose			
To determine eligibility		For administering human resources programs	X
For administrative matters	X	To promote information sharing initiatives	
For litigation	X	For criminal law enforcement activities	X

For civil enforcement activities	X	For intelligence activities	
To improve Federal services online		For employee or customer satisfaction	
For web measurement and customization technologies (single-session)		For web measurement and customization technologies (multi-session)	
Other (specify): PII/BII are collected to support NOAA4100 business functions			

Section 5: Use of the Information

- 5.1 In the context of functional areas (business processes, missions, operations, etc.) supported by the IT system, describe how the PII/BII that is collected, maintained, or disseminated will be used. Indicate if the PII/BII identified in Section 2.1 of this document is in reference to a federal employee/contractor, member of the public, foreign national, visitor or other (specify).

GARFO collects and maintains PII from employees and contractors for the following administrative support purposes:

1. For employment onboarding process and HR administration
2. For Establishing Employee IT system user accounts

GARFO collects and maintains PII and BII through a combination of sources including data from Permits, Dealer data through ACCSP which is a public organization. Information collected is both for reporting of trip data and catch landings.

The following information is collected from members of the public:

Permits Data:

Vessel Owner Name, Name of Vessel and Permit Number are made publically available through our website. We also allow other regions, centers and state organizations access to the publically available information directly from our database through a secure connection.

This information will allow GARFO to identify owners and holders of permits and non-permit registrations and vessel owners and operators for both civil and criminal enforcement activities, evaluate permit applications, and document agency actions relating to the issuance, renewal, transfer, revocation, suspension or modification of a permit or registration. GARFO may use lists of permit holders or registrants as sample frames for the conduct of surveys to collect information necessary to the administration of the applicable statutes.

GARFO may post non-sensitive permit holder, vessel-related, and/or IFQ information for the public, via Web sites and Web Services, per notice given on permit applications. This information is considered to be part of the public domain.

Tax Identification Numbers allow positive identification for cost recovery billing of IFQ holders. Also, as stated in both SORNs' routine uses, a Tax Identification Number is required on all permit applications other than research or exempted fishing permits, under the authority

31 U.S.C. 7701. For purposes of administering the various NMFS fisheries permit and registration programs, a person shall be considered to be doing business with a Federal agency including, but not limited to, if the person is an applicant for, or recipient of, a Federal license, permit, right-of-way, grant, or benefit payment administered by the agency or insurance administered by the agency pursuant to subsection (c) (2) (B) of this statute.

Section 6: Information Sharing and Access

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. *(Check all that apply.)*

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau	X	X	X
DOC bureaus			
Federal agencies	X		
State, local, tribal gov't agencies	X	X	X*
Public			X*
Private sector	X		
Foreign governments			
Foreign entities			
Other (specify):			

* Public Web site

<input type="checkbox"/>	The PII/BII in the system will not be shared.
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6.2 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

X	Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: NOAA4200, Northeast Fisheries Science Center Network and NOAA4000, Fisheries Wide Area Network and Enterprise Services. All channels between systems are encrypted.
	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.3 Identify the class of users who will have access to the IT system and the PII/BII. (*Check all that apply.*)

Class of Users			
General Public		Government Employees	X
Contractors	X		
Other (specify):			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. (*Check all that apply.*)

x	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
X	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and notice of how PII/BII is used is available on the vessel and dealer permit applications. Vessel permit application: http://www.greateratlantic.fisheries.noaa.gov/aps/permits/forms/initlins.pdf p. 19 (last page of instructions); dealer permit application: http://www.greateratlantic.fisheries.noaa.gov/aps/permits/forms/inidlrtrappl.pdf p. 6 (last page of application)	
X	Yes, notice is provided by other means.	Specify how: See above regarding fishing and dealer permits. For employee onboarding and Human Resources (HR) administration, forms such as Declaration for Federal Employment (OF-306) provide notice and privacy statements (OF-306: https://www.opm.gov/forms/pdf_fill/of0306.PDF). For system administration, notice is given in writing as part of the supervisor’s request for the PII.
	No, notice is not provided.	Specify why not:

7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

X	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how: Dealers do have the right to decline, by not providing data to ACCSP, but in doing so any trips or landings that they make will be in violation of permit requirements.
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		<p>Permit Data: The personal information is collected when the individual completes the appropriate application. On the application, the individual is advised that NMFS will not be able to issue a permit if the individual does not provide each item of information requested. The individual may choose to decline to provide the required personal information at that time, but will not be able to receive a permit.</p> <p>For employee onboarding and HR administration: Individuals may decline to provide PII to their HR specialist or supervisor, in writing, but this may affect their employment status.</p> <p>Employees may decline to provide PII for system administration (to their supervisors, in writing), but their employment status may be affected.</p>
	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not:

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

X	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	<p>Specify how: Dealers/Permits: Individuals have the right to consent to particular uses of their PII/BII, either to an intermediary entity such as ACCSP, yet failure to consent to all uses of the information negates their opportunities to legally fish. A written statement of consent to only particular uses, of those outlined on fishing or dealer applications, would be sent to the entity directly receiving the information.</p> <p>For employee onboarding and HR administration: Individuals have the right to consent to only particular uses of their PII, to their HR specialists or supervisors in writing, but failure to consent to all uses affects their employment status.</p> <p>Employee PII for system administration has only one use.</p>
	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

X	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	<p>Specify how: Permit Data: Information may be reviewed/updated when completing or renewing a permit application or supporting document, or by calling (978) 281-9246 or emailing the applicable NMFS office at any time (contact information is on the permits and permit applications).</p>
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		Dealers may contact ACCSP by email at info@accsp.org to request that updates be made. Federal Employees/Contractors have the ability to review and update their PII through their HR Specialists. This information is provided as part of new employee orientation.
	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

Section 8: Administrative and Technological Controls

8.1 Indicate the administrative and technological controls for the system. (*Check all that apply.*)

X	All users signed a confidentiality agreement or non-disclosure agreement.
X	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
X	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
X	Access to the PII/BII is restricted to authorized personnel only.
X	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: Application accounts that are used to add and edit data into database tables that contain PII/BII are audited to a level in which we know who made the changes, and what the changes were.
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): <u>_5/4/2016_____</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
X	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
X	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security and privacy controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POAM).
X	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
	Contracts with customers establish ownership rights over data including PII/BII.
	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
	Other (specify):

8.2 Provide a general description of the technologies used to protect PII/BII on the IT system.

PII/BII for dealer /Permit reporting is stored on a private network in a database with FISMA compliant access controls in place. Applications that interact with the database do so through encrypted channels. There are plans for encryption of this data at rest.

PII used for supporting administrative functions is stored on an access controlled network share. The data at rest is stored in an encrypted state, with a minimum of 128 bit AES in a Microsoft office file.

Section 9: Privacy Act

9.1 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C. § 552a. *(A new system of records notice (SORN) is required if the system is not covered by an existing SORN).*

As per the Privacy Act of 1974, “the term ‘system of records’ means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”

X	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name and number <i>(list all that apply)</i> : COMMERCE/NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries; DEPT-18, Employees Information not covered by Records of other Agencies.
	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
	No, a SORN is not being created.

Section 10: Retention of Information

10.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. *(Check all that apply.)*

X	There is an approved record control schedule. Provide the name of the record control schedule: 200-01 Administrative and Housekeeping Records, 1507 Fisheries Statistics and Marketing News Reporting Files, 2300-04 Information Technology Operations and Maintenance Records
	No, there is not an approved record control schedule. Provide the stage in which the project is in developing and submitting a records control schedule:
X	Yes, retention is monitored for compliance to the schedule.

	No, retention is not monitored for compliance to the schedule. Provide explanation:
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10.2 Indicate the disposal method of the PII/BII. *(Check all that apply.)*

Disposal			
Shredding	X	Overwriting	
Degaussing		Deleting	X
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Levels

11.1 Indicate the potential impact that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed.

	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
X	High – the loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.

11.2 Indicate which factors were used to determine the above PII confidentiality impact levels. *(Check all that apply.)*

X	Identifiability	Provide explanation: A significant amount of individuals could be identified from the PII stored.
X	Quantity of PII	Provide explanation: NOAA4100 collects as little PII as necessary to support business functions, but this includes PII from Permits data and from internal administrative functions.
X	Data Field Sensitivity	Provide explanation: Sensitive information including the Social Security Number is collected.
X	Context of Use	Provide explanation: The value of the data beyond its use at GARFO and other supporting missions is small.
X	Obligation to Protect Confidentiality	Provide explanation: Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 et seq.
X	Access to and Location of PII	Provide explanation: PII/BII for dealer and permit reporting is stored on a private network in a database with FISMA compliant access controls in place. Applications that interact with the database do so through encrypted channels. PII used for supporting administrative functions is stored on an access controlled network share. The data at rest is stored in an

		encrypted state, with a minimum of 128 bit AES in a Microsoft office file.
	Other:	Provide explanation:

Section 12: Analysis

12.1 Indicate whether the conduct of this PIA results in any required business process changes.

X	Yes, the conduct of this PIA results in required business process changes. Explanation: Encryption of Permit and Dealer PII and BII at rest.
	No, the conduct of this PIA does not result in any required business process changes.

12.2 Indicate whether the conduct of this PIA results in any required technology changes.

X	Yes, the conduct of this PIA results in required technology changes. Explanation: Encryption of Permit and Dealer PII and BII at rest.
	No, the conduct of this PIA does not result in any required technology changes.