U.S. Department of Commerce Privacy Threshold Analysis

NOAA4600

**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:**

NOAA4600 supports the mission of the Northwest Fisheries Science Center (NWFSC). “Scientists at the NWFSC conduct leading-edge research and analyses that provide the foundation for management decisions to protect, recover, restore, and sustain ecosystems and living marine resources in the Pacific Northwest.” NWFSC researchers are dedicated to producing scientific products that will strengthen decision-making at all levels, enhance socio-economic benefits, support sustainable resource use, and conserve biological diversity.

The NWFSC supports 4 major science and research themes:
1. Ecosystem Approach to Management for the California Current Large Marine Ecosystem
2. Habitats to Support Sustainable Fisheries and Recovered Populations
3. Recovery, Rebuilding and Sustainability of Marine and Anadromous Species
4. Oceans and Human Health

**Key Roles:**
- Provide current, relevant information to support science-based stewardship of natural resources. The primary mission of the NWFSC is to provide multi-disciplinary scientific and technical information to the West Coast Regional Office of NOAA Fisheries, other NOAA line offices, co-managers, stakeholders and other constituents to inform decision and policy-making processes.
- Foster scientific literacy and expertise. In order to achieve the national missions of NOAA, the NWFSC must ensure that Center research results reach the broader science, education, and public communities within the region and beyond. The Center has the additional responsibility to help train the next generation of fisheries scientists.

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).
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>
<td>d. Significant Merging</td>
<td>g. New Interagency Uses</td>
<td></td>
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<tr>
<td>b. Anonymous to Non-Anonymous</td>
<td>e. New Public Access</td>
<td>h. Internal Flow or Collection</td>
<td></td>
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<tr>
<td>c. Significant System Management Changes</td>
<td>f. Commercial Sources</td>
<td>i. Alteration in Character of Data</td>
<td></td>
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<tr>
<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.**

  ___ 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).  **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.**

  ___ 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 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 NOAA4600 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 Information System Security Officer (ISSO) or System Owner (SO):
Alicia Matter, NOAA4600 System Owner

Signature of ISSO or SO: MATTER.ALICIA.L.13 65880014 Digitally signed by MATTER.ALICIA.L.1365880014 Date: 2018.02.27 11:34:54 -08'00'
Date: 02/27/2018

Name of Information Technology Security Officer (ITSO):
Catherine Amores

Signature of ITSO: AMORES.CATHERINE.SOLEDAD.1541314390 Digitally signed by AMORES.CATHERINE.SOLEDAD.1541314390 Date: 2018.03.05 13:49:58 -05'00'
Date: 3/5/2018

Name of Authorizing Official (AO):
Mark Strom, Authorizing Official

Signature of AO: STROM.MARK.STEPHEN.DR.1365882890 Digitally signed by STROM.MARK.STEPHEN.DR.1365882890 Date: 2018.02.27 12:55:01 -08'00'
Date: 02/27/2018

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

Signature of BCPO: GRAFF.MARK.HYRUM.M.1514447892 Digitally signed by GRAFF.MARK.HYRUM.M.1514447892 Date: 2018.03.05 14:37:00 -05'00'
Date: 3.5.18