

U.S. Department of Commerce NOAA NMFS



Privacy Impact Assessment for the Alaska Region (AKR) Local Area Network (LAN) – NOAA4700

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Date

U.S. Department of Commerce Privacy Impact Assessment AKR LAN – NOAA4700

Unique Project Identifier: 006-48-01-14-02-3305-00

Introduction: System Description

The Alaska Region (AKR) of National Oceanic & Atmospheric Administration (NOAA) Fisheries is one of six regional offices. The AKR oversees sustainable fisheries that produce about half the fish caught in US waters, with responsibilities covering 842,000 square nautical miles of water surrounding Alaska. The AKR also works to ensure the viability of protected species—principally marine mammals—and to protect and enhance Alaska's marine habitat.

The AKR Local Area Network (LAN) NOAA4700 is one of NOAA's general support systems (GSS), an interconnected information resource under direct management control with shared common functionality. NOAA4700 is a GSS that supports the AKR's mission with the following major applications: office automation; public interface via the Internet; and fisheries information management, including permits and catch accounting. NOAA4700 is a **Moderate** impact system.

The PII and BII that NOAA4700 collects may be categorized as **Personnel/Contracting**, **Permitting**, and **Strandings**. Each category is further discussed below.

Personnel/Contracting: In the course of daily business, the following information is routinely collected and maintained on AKR federal employees and contractors:

- Employee/Contractor Name
- Address
- Date of birth
- Social Security Number

- Business Email
- Business Address
- Business Phone Number
- Alternate phone number (i.e. cell phone)

This information is used for:

- Security investigations
- Federal employee personnel actions
- Federal employee performance reviews
- Federal employee payroll
- Federal employee awards

- HSPD-12 Common Access Cards

Information Sharing: The information is shared with NOAA Fisheries, the Office of Personnel Management, the Department of Commerce (DOC) Office of Security, the Defense Enrollment Eligibility Reporting System (DEERS), and the Real-Time Automated Personnel Identification System (RAPIDS).

Statutory Authority: 5 U.S.C. 1301.

Permitting: In order to manage U.S. fisheries, the NOAA Fisheries requires the use of permits or registrations by participants in the United States. Information in the NOAA4700 system 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 AKR website, submits it to the AKR by mail, along with any required supporting documentation and/or required fee payment, and receives a new permit once approved by the AKR. AKR also provides the option of online submission of permit applications and related information, via secure web pages.

The following information may be collected:

- Name
- Address
- Date of birth
- Social Security Number/Tax Identification Number
- Marriage certificates
- Divorce decrees
- Death certificates
- Vessel name

Information Sharing: Information is shared within the AKR in order to coordinate monitoring and management of sustainability of fisheries and protected resources (see next paragraph for additional sharing information). Sources of information include the permit applicant/holder, other NMFS offices, the U.S. Coast Guard, and the Pacific States Marine Fisheries Commission (PSMFC).

Information may also be disclosed:

- At the state or interstate level within the PSMFC 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.
- To the North Pacific Fishery Management Council staff and contractors tasked with development of analyses to support Council decisions about Fishery Management Programs.

- To the International Pacific Halibut Commission (IPHC) for the purposes of identifying current permit owners and vessels pursuant to applicable statutes or regulations and/or conservation and management measures adopted by the IPHC.
- To 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.

Statutory Authorities: 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 Northern Pacific Halibut Act, 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.

Strandings: The AKR collects and compiles data about marine mammal strandings throughout Alaska. The network is composed of state and federal wildlife and fisheries agencies, veterinary clinics, Alaska Native organizations, academic institutions, and individuals who respond to or provide professional advice on handling strandings.

Information collected includes:

- Name
- Telephone Number
- Email

Information Sharing: Strandings information may be shared with members of the AKR Strandings Network including:

- Alaska
 - Alaska Consortium of Zooarchaeologists
 - Alaska Department of Fish and Game
 - Alaska Sea Grant Marine Advisory Program
 - Alaska Sealife Center
 - Alaska Veterinary Pathology Services
 - The Alaska Whale Foundation
 - Aleut Community of St. Paul and Fur Seal Disentanglement Project
 - Rachel Bergartt, DVM
 - Chicago Conservation Council
 - Glacier Bay National Park and Preserve
 - NOAA Fisheries Alaska Region
 - North Slope Borough
 - The Petersburg Marine Mammal Center

- Sitka Sound Science Center
- University of Alaska Southeast, Juneau
- University of Alaska Southeast, Sitka
- University of Alaska Fairbanks, Marine Advisory Program
- University of Alaska Fairbanks, Museum of the North
- U.S. Fish and Wildlife Service, Alaska Region
- U.S. Forest Service, Alaska
- National
 - Marine Mammal Health and Stranding Response Program
 - Prescott Marine Mammal Rescue Assistance Grant Program
 - Unusual Marine Mammal Mortality Events Working Group
- Research
 - National Marine Mammal Laboratory
 - University of Alaska Museum Specimen Database (external website)

Statutory Authorities: The Marine Mammal Protection Act, the Endangered Species Act, and the Fur Seal Act.

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):					

__X__ This is an existing information system in which changes do not 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		j. Financial Account	X
c. Employer ID	X	g. Passport		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), 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:					
<p>Social Security numbers and tax identification numbers (TIN) allow positive identification for cost recovery billing of IFQ holders. Also, as stated in COMMERCE/NOAA-19, a TIN 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.</p>					
<p>**Financial transactions are for cost recovery in catch share programs. Cost recovery is a means by which NMFS recovers administrative costs, by charging a set percentage of the ex-vessel value each year. The ex-vessel value is the post-season adjusted price per pound for the first purchase of commercial harvest. Certain items under "Other Information" are components of ex-vessel value.</p>					
<p>For permit fees, checks may be submitted by mail to AKR, per regulation.</p> <ul style="list-style-type: none"> - AKR electronically scans the checks into an OTCnet (Treasury) application. - OTCnet processes the payment. - OTCnet returns a report to AKR that the check has been processed, including bank and account numbers, but without names. - After matching the check to OTCnet report, AKR shreds the check and deletes the report, both on paper and electronically. 					

General Personal Data (GPD)					
Name	X	g. Date of Birth	X	m. Religion	
a. Maiden Name		h. Place of Birth		n. Financial Information	X* **
b. Alias		i. Home Address	X	o. Medical Information	X
c. Gender		j. Telephone Number	X	p. Military Service	
d. Age	X	k. Email Address	X	q. Physical Characteristics	X
e. Race/Ethnicity		l. Education		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, and descendent.					

*** Refers to the transaction and accounts boxes checked in Identifying Numbers.

Work-Related Data (WRD)					
a. Occupation	X	d. Telephone Number	X	f. Salary	X
b. Job Title	X	e. Email Address	X	g. Work History	X

c. Work Address	X	f. Business Associates	X		
h. Other work-related data (specify): Cell phone or other alternate work/contact number, name of manager/supervisor, 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	
j. Other distinguishing features/biometrics (specify): Height, weight, hair and eye color, medical records for permit disputes					

*Required to be submitted with permit applications.

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

Other Information (specify)					
Fishing locations and methods. Catch information to include 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).					

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	X		
Other (specify):					

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

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

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	
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): BII is collected for regulatory requirements with respect to fisheries regulation in Magnuson - Stevens			

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.

Personnel/Contracting: PII information is collected for both contractor and federal employee personnel designated to work with AKR. This is information collected for several administrative and business functions for the AKR:

- (a) Recall and notifications for continuity planning
- (b) Incident response plan and outage notification/escalation
- (c) Account management processes (i.e. Requesting accounts, approving accounts, terminating accounts etc.)
- (d) NOAA Staff Directory

Permitting: This information will allow NMFS 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. NMFS 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 (see NOAA-19 SORN).

NMFS 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.

Strandings: Stranded animals may provide information on geographical distribution, feeding habits, reproduction, age distribution, diseases, parasites, and contaminant levels. If strandings are reported quickly, the network also may facilitate the rapid identification of mass mortalities or strandings caused by disease or toxicity/pollution problems. By conducting necropsies on dead stranded animals, it is also possible to learn more about the basic physiology and biology of animals not accessible in the wild or by any other means. Necropsies also have provided data on the incidence of human interactions including ship strikes, shootings, entanglements, and marine debris ingestions. These data help NMFS to make better management decisions about these stocks of marine mammals.

Without authorization from NMFS, the public cannot pick up stranded marine mammals. However, assistance in documenting the incident is helpful and will allow stranding network members to respond. The most important information to collect is the date, location of

stranding (including latitude and longitude), number of animals, and species, if known.

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	X		
Federal agencies	X		
State, local, tribal gov't agencies	X	X	X
Public			X
Private sector	X		
Foreign governments			
Foreign entities			
Other (specify):			

<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.

<input checked="" type="checkbox"/>	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII.</p> <p>Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>NOAA4000, NMFS LAN, WAN encryption NOAA4020, Science and Technology, WAN encryption NOAA4600, NOAA Seattle Local Area Network, WAN encryption</p>
<input type="checkbox"/>	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/or privacy policy may be found at: http://www.nmfs.noaa.gov/aboutus/privacy.html . There is also a Privacy Act Statement on permit applications: https://alaskafisheries.noaa.gov/webapps/efish/login		
X	Yes, notice is provided by other means.	Specify how: Notice is provided on the permit or related application.	
	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: Personnel/Contracting: Federal employees and contractors may decline to provide PII/BII in writing to their respective supervisor and contracting officer's representative, however, doing so may affect the status of employment and contract. Permitting: 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, by not completing the application, but will not be able to receive a permit. Strandings: Individuals may decline to submit strandings reports, by not submitting them.
	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:</p> <p>Personnel/Contracting: Employees and Users are provided with the link to NOAA’s privacy policy where it states: “Submitting voluntary information constitutes your consent to the use of the information for the stated purpose”.</p> <p>Permitting: Permittees are provided with the link to NOAA’s privacy policy where it states: “Submitting voluntary information constitutes your consent to the use of the information for the stated purpose”.</p> <p>Strandings: Strandings reporters are provided with the link to NOAA’s privacy policy where it states: “Submitting voluntary information constitutes your consent to the use of the information for the stated purpose”.</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:</p> <p>Personnel/Contracting: Individuals may update PII/BII upon written request to Chief, Operations and Management Division, Alaska Region, NOAA Fisheries. Other information is maintained within the NOAA Enterprise Messaging System (NEMS) database where users can review and update their contact information.</p> <p>Permitting: Information may be reviewed or updated when completing or renewing a permit application or supporting document, or by calling or emailing the applicable NMFS office at any time: 978-282-8438 (information is on permits and permit applications).</p> <p>Strandings: Individuals may update PII/BII upon written request to Chief, Protected Resources Division, Alaska Region, NOAA Fisheries.</p>
	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: System activity is captured with Active Directory event logging, Oracle auditing, and Cisco Firesight network monitoring.
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): May 5, 2016 <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.

The potential risk of inappropriate disclosure and/or unauthorized disclosure is mitigated by limiting the number of authorized system users, providing initial and annual system security training, monitoring authorized user activity, automatic and immediate notification of unauthorized system access or usage to the system administrator, documenting user violations, and gradually increasing user reprimands for system violations ranging from a verbal warning with refresher security training to denial of system access. Our permitting data is encrypted at rest and our backup tapes are encrypted.

The information is secured via both administrative and technological controls. PII and BII are stored on shared drives that require common access card (CAC) for access. The principle of least privileged and separation of duties is implemented by AKR to ensure that only personnel with the need to know have access to this information.

All NMFS personnel and contractors are instructed on the confidential nature of this information. Through acknowledgement of the NOAA rules of behavior, account request agreements etc. all users are instructed to abide by all statutory and regulatory data confidentiality requirements, and will only release the data to authorized users.

Buildings employ security systems with locks and access limits. Only those that have the need to know, to carry out the official duties of their job, have access to the data. Computerized data

base is password protected, and access is limited. Paper records are maintained in secured file cabinets in areas that are accessible only to authorized personnel of NOAA4700.

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	<p>Yes, this system is covered by an existing system of records notice (SORN).</p> <p>Provide the SORN name and number <i>(list all that apply)</i>:</p> <p>Personnel/Contracting: The existing Privacy Act System of records for DEPT-18 Employees Personnel Files Not Covered by Notices of Agencies.</p> <p>Permitting: NOAA-19, Permits and Registrations for United States Federally Regulated Fisheries.</p> <p>Strandings: Information is not retrieved by individual name or identifying number.</p>
	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	<p>There is an approved record control schedule.</p> <p>Provide the name of the record control schedule: NOAA Disposition Handbook Chapter 200-23 (Personnel Files) and Chapter 1500: 1505-11, 1507-11, and 1514-01</p>
	<p>No, there is not an approved record control schedule.</p> <p>Provide the stage in which the project is in developing and submitting a records control schedule:</p>
X	Yes, retention is monitored for compliance to the schedule.
	No, retention is not monitored for compliance to the schedule. Provide explanation:

- 10.2 Indicate the disposal method of the PII/BII. *(Check all that apply.)*

Disposal		
Shredding	X	Overwriting
Degaussing	X	Deleting
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.
X	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
	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.)

	Identifiability	Provide explanation:
X	Quantity of PII	Provide explanation: For permitting, the AKR maintains a significant quantity of sensitive PII.
X	Data Field Sensitivity	Provide explanation: The AKR maintains sensitive PII, especially Social Security numbers and tax identification numbers
	Context of Use	Provide explanation:
X	Obligation to Protect Confidentiality	Provide explanation: Permits data confidentiality is authorized by the Magnuson-Stevens Fishery Conservation and Management Act.
X	Access to and Location of PII	Provide explanation: Sensitive data is encrypted at rest and access is also restricted.
	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: No longer storing account numbers and cancelled checks.
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	No, the conduct of this PIA does not result in any required business process changes.
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12.2 Indicate whether the conduct of this PIA results in any required technology changes.

	Yes, the conduct of this PIA results in required technology changes. Explanation:
X	No, the conduct of this PIA does not result in any required technology changes.