U.S. Department of Commerce Privacy Threshold Analysis

NWS NWSHQNet NOAA8205

U.S. Department of Commerce
National Oceanic and Atmospheric Administration National Weather Service

Privacy Threshold Analysis
For the

National Weather Service Headquarters Local Area Network (NWSHQNet)

NOAA8205
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 National Weather Service Headquarters Local Area Network (NWSHQNet), NOAA8205, is a general support system consisting of domain controllers, servers, desktop/workstation, laptops, printers and network infrastructure components. NOAA8205 is located within the Silver Spring Metro Complex Building 2 (SSMC-2) and supports approximately 800 users and 1500 network devices. NOAA8205 provides network infrastructure support, management and connectivity services for administrative functions to include: Service Desk support, Active Directory, file and print, file backup and restoration, storage, Dynamic Host Configuration Protocol, Windows Internet Name Services, Domain Name Service, IP address space allocation, application distribution and patch management, backup and disaster recovery to the desktop and server customers within the NOAA8205 accreditation boundary. In addition, it provides system-level support for servers, desktops/workstations, and laptops and a test lab mimicking the production environment for systems and network engineers to develop and test new technologies. Lastly, the NOAA8205 active directory user base receives electronic mail and calendar services from the NOAA Messaging Operations Center.
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>
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<td>a. Conversions</td>
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<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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<td>e. New Public Access</td>
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<td>f. Commercial Sources</td>
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<td>g. New Interagency Uses</td>
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<td>h. Internal Flow or Collection</td>
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<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. *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
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

☒ I certify the criteria implied by one or more of the questions above apply to the NWSHQNet NOAA8205 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 NWSHQNet NOAA8205 and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO): Tommy Thompson

Name of Information Technology Security Officer (ITSO): Beckie Koonge

Name of Authorizing Official (AO): Jeremy Warren

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