

**U.S. Department of Commerce  
U.S. Census Bureau**



**Privacy Impact Assessment  
for the  
CEN15 Centurion System**

Reviewed by: Byron Crenshaw, 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  
U.S. Census Bureau/Centurion**

**Unique Project Identifier: 006-000401700**

**Introduction: System Description**

*Provide a description of the system that addresses the following elements:*

*The response must be written in plain language and be as comprehensive as necessary to describe the system.*

*(a) a general description of the information in the system*

The CEN15 IT system includes Centurion. This is a web-based application used for the design, delivery, and execution of surveys, censuses, and other data collection and data exchange efforts over the Internet. Centurion allows the Census Bureau to collect data more cost effectively and with a higher degree of accuracy as compared to equivalent traditional data collection methods. CEN15 is located at the Bowie Computer Center.

- Information collected via the Centurion IT system includes data covered by Title 13 and Title 26 collection authorities for demographic and economic surveys. Standard web browser clients are used to access the Centurion IT system. Members of the public accessing Centurion are survey or census respondents. Information collected via Centurion includes, but is not limited to, names, telephone numbers, email addresses, etc.

*(b) a description of a typical transaction conducted on the system*

Survey respondents access the Centurion web application on the internet using a secure web browser. They authenticate to the IT system, enter response data through a series of interactive web forms, and submit survey responses.

*(c) any information sharing conducted by the system*

The Centurion application allow survey sponsors, both internally (program area sponsors) and externally (sponsors of reimbursable surveys), access to their specific data. In other words, the data is shared by allowing Census Bureau personnel and data sponsors access to the data. Census Bureau personnel may have to process some data for external survey sponsors. The Centurion system automatically generates output files for each survey in one of many supported output formats. Output files are generated on a predetermined schedule and either delivered to the Bureau's MCS system where internal Bureau survey areas can then pick up their files or are delivered directly to where internal Bureau survey areas servers using the secure protocol.

*(d) citation of the legal authority to collect PII and/or BII*

13 U.S.C. Sections 8(b), 131, 161, 141, 182, 193 and 26 U.S.C 6103(j).

*(e) the Federal Information Processing Standard (FIPS) 199 security impact category for the system:*

Moderate

**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 without 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*		e. File/Case ID	X	i. Credit Card	
b. Taxpayer ID	X	f. Driver's License		j. Financial Account	
c. Employer ID	X	g. Passport		k. Financial Transaction	
d. Employee ID		h. Alien Registration		l. Vehicle Identifier	X
m. Other identifying numbers (specify):					
*Explanation for the need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	X	g. Date of Birth	X	m. Religion	
b. Maiden Name	X	h. Place of Birth	X	n. Financial Information	X
c. Alias	X	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	
f. Race/Ethnicity	X	l. Education	X	r. Mother's Maiden Name	
s. Other general personal data (specify): Other general personal data (specify): Citizenship					

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):					

<b>Distinguishing Features/Biometrics (DFB)</b>					
a. Fingerprints		d. Photographs		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):					

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

<b>Other Information (specify)</b>					

2.2 Indicate sources of the PII/BII in the system. *(Check all that apply.)*

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

<b>Government Sources</b>					
Within the Bureau		Other DOC Bureaus		Other Federal Agencies	
State, Local, Tribal		Foreign			
Other (specify):					

<b>Non-government Sources</b>					
Public Organizations		Private Sector		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.)*

<b>Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNDP)</b>
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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 that raise privacy risks/concerns. *(Check all that apply.)*

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

X	There are not any IT system supported activities that 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.)*

<b>Purpose</b>			
To determine eligibility		For administering human resources programs	
For administrative matters		To promote information sharing initiatives	
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
To improve Federal services online	X	For employee or customer satisfaction	
For web measurement and customization technologies (single-session )		For web measurement and customization technologies (multi-session )	
Other (specify): For statistical purposes (i.e., Censuses/Surveys)			

### **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).

Centurion collects PII and BII from members of the public for several censuses and surveys conducted by the Census Bureau.

To improve Federal services online: Customers are able to submit surveys via Centurion.

For statistical purposes (i.e., Censuses/Surveys): The Economic Census is the U.S. Government's official five-year measure of American business and the economy conducted by the U.S. Census Bureau. Responding to the Census is required by law. Forms are mailed to approximately 4 million businesses, including large, medium, and small companies representing all U.S. industries. Respondents are asked to provide a range of operational and performance data for their companies.

Centurion also collects data for the American Community Survey (ACS). This ongoing survey provides data annually, giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year.

Centurion also collects data for the Decennial Census tests, demographic, and other economic survey collections. The collections are for statistical purposes such as the Annual Wholesale Trade Survey (AWTS), Private School Survey (PSS), Annual Retail Trade Report Survey (ARTS), Annual Survey of Local Government Finances (ALFIN), etc.

## **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	
DOC bureaus			
Federal agencies	X*		X*
State, local, tribal gov't agencies			
Public			
Private sector			
Foreign governments			
Foreign entities			
Other (specify):* Identifiable information will not be shared.			

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	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII.</p> <p>CEN15 connects internally with Census Bureau systems CEN03, CEN05, CEN07, CEN18, CEN30, and CEN36.</p> <p>Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>The CEN15 Centurion IT system uses a multitude of security controls mandated by the Federal Information Security Management Act of 2002 (FISMA) and various other regulatory control frameworks including the National Institute of Standards and Technology (NIST) special publication 800 series. These security controls include, but are not limited to the use of mandatory HTTPS for public facing websites, access controls, anti-virus solutions, enterprise auditing/monitoring, encryption of data at rest, and various physical controls at Census Bureau facilities that house Information Technology systems. Census Bureau also deploys an enterprise Data Loss Protection (DLP) solution as well.</p>
	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	X	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 can be found at: <a href="http://www.census.gov/about/policies/privacy/privacy-policy.html">http://www.census.gov/about/policies/privacy/privacy-policy.html</a>	
X	Yes, notice is provided by other means.	Specify how: via Privacy Act Statements provided to respondents prior to responding to a census or survey.
	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: Various surveys maintained by the CEN15 IT system are voluntary and therefore not required to provide PII/BII.
X	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: Some surveys and the Economic Census are mandatory as required by 13 U.S.C. Individuals are informed of this by one of the following: via Privacy Act Statements

		upon login, letter, interview, or during data collection.
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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.	Specify how: Various surveys maintained by the CEN15 IT system are voluntary and therefore not required to provide PII/BII.
X	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: Some surveys and the Economic Census data maintained by the CEN15 IT system are mandatory as required by 13 U.S.C. The data are used for statistical and administrative purposes only and are exempt from consent to particular uses of PII/BII.

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.	Specify how: For the Economic Census and surveys maintained by the CEN015 IT system, individuals have the opportunity to provide updates to PII/BII data on the submitted survey or on the survey website.
X	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: For surveys that collect information for statistical purposes, respondents are exempt from review/update of PII/BII unless the Census Bureau contacts them to update the information.

## **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: Only authorized government/contractor personnel are allowed to access PII/BII within a system. Authorizations for users occur yearly, at a minimum in accordance with applicable Bureau, Agency, and Federal policies/guidelines. In addition to system processes that handle PII/BII, all manual extractions for PII/BII are logged and recorded per Department of Commerce Policy, the NIST 800-53 Appendix J Privacy Control Catalog, and specifically NIST control AU-03, Content of Audit records.
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): 07/11/2019 <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 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.

X	Other (specify): Publications are subject to approval by the Disclosure Review Board
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8.2 Provide a general description of the technologies used to protect PII/BII on the IT system.

Census Bureau Information technology systems employ a multitude of layered security controls to protect BII/PII at rest, during processing, as well as in transit. These NIST 800-53 controls, at a minimum, are deployed and managed at the enterprise level including, but not limited to the following:

- Intrusion Detection | Prevention Systems (IDS | IPS)
- Firewalls
- Mandatory use of HTTP(S) for Census Public facing websites
- Use of trusted internet connection (TIC)
- Anti-Virus software to protect host/end user systems
- Encryption of databases (Data at rest)
- HSPD-12 Compliant PIV cards
- Access Controls

Census Bureau Information technology systems also follow the National Institute of Standards and Technology (NIST) standards including special publications 800-53, 800-63, 800-37 etc. Any system within the Census that contains, transmits, or processes BII/PII has a current authority to operate (ATO) and goes through continuous monitoring on a yearly basis to ensure controls are implemented and operating as intended. The Census Bureau also deploys a DLP solution as well.

## **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). Provide the SORN name and number <i>(list all that apply)</i>:</p> <p>COMMERCE/CENSUS-3, Special Censuses, Surveys, and Other Studies- <a href="http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-3.html">http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-3.html</a></p> <p>COMMERCE/CENSUS-4, Economic Survey Collection- <a href="http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-4.html">http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-4.html</a></p> <p>COMMERCE/CENSUS-5, Decennial Census Program- <a href="http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html">http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html</a></p> <p>COMMERCE/CENSUS-7, Special Censuses of Population Conducted for State and Local Government- <a href="http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-7.html">http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-7.html</a></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	There is an approved record control schedule. Provide the name of the record control schedule:
	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:

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

<b>Disposal</b>			
Shredding		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: PII collected can directly identify individuals
X	Quantity of PII	Provide explanation: The collection is for Census Bureau Censuses and surveys, therefore, a severe or catastrophic number of individuals would be affected if there was loss, theft or compromise of the data.
X	Data Field Sensitivity	Provide explanation:

		The PII, alone or in combination, are directly usable in other contexts and make the individual or organization vulnerable to harms, such as identity theft, embarrassment, loss of trust, or costs.
X	Context of Use	Provide explanation: Disclosure of the PII/BII in this IT system or the PII/BII itself may result in severe or catastrophic number of harm to the organization.
X	Obligation to Protect Confidentiality	Provide explanation: PII/BII collected is required to be protected in accordance with 13 U.S.C. section 9.
X	Access to and Location of PII	Provide explanation: PII/BII is located on computers and other devices on a network controlled by the Census Bureau. Access limited to certain populations of the Census Bureau's workforce and limited to Special Sworn Status individuals (e.g., of sponsoring agencies). Access only allowed by organization-owned equipment outside of the physical locations owned by the organization only with a secured connection.
	Other:	Provide explanation:

## **Section 12: Analysis**

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

	Yes, the conduct of this PIA results in required business process changes. Explanation:
X	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.

	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.