

**U.S. Department of Commerce  
National Oceanic and Atmospheric Administration**



**Privacy Threshold Analysis  
for the  
NOAA4800 - Alaska Fisheries Science Center (AKFSC) Network**

**U.S. Department of Commerce Privacy Threshold Analysis**  
**National Oceanic and Atmospheric Administration**  
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**Unique Project Identifier: 006-03-02-00-01-0511-00**

**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 NOAA4800 system consists of a series of Local Area Networks (LANs) connected via a shared Wide Area Network (WAN) connection. The LANs are separated from the WAN by a firewall and router. Via the system identified as NOAA4000, NMFS CIO staff manage the WAN and all of the firewalls except for the Seattle LAN firewall. A common Active Directory, managed by the NMFS EAD staff, binds the LANs into one system. See diagram below. Three programs with privacy-related data within the system are:

NORPAC Database (Observer Data): NORPAC refers to the observer data collection within the North Pacific by the Fisheries Management and Analysis (FMA) division within NOAA4800. In the past, it was referred to simply as the Observer Database. It is not a true acronym. The database consists of various data collected by fishery biologists while deployed on board commercial fishing vessels or at shoreside processing plants participating in the Bering Sea and Gulf of Alaska groundfish fisheries. Data collection activities began in 1973 and they continue to date. While deployed at their assignments, observers collect data on the catch size, fishing locations, catch composition, length frequencies, age structures, marine mammal interactions, and a variety of research projects. The specific data components collected are outlined in the Groundfish Observer Manual. Once received by FMA, these data are extensively checked for quality and are then entered onto an Oracle database and made available to authorized staff. The database also stores observer training records and performance evaluations.

All of these data are collected cooperatively from private commercial fishing interests and are protected from general release by confidentiality statutes. This protects the private business interests of industry while still providing NOAA Fisheries with the detailed information necessary to effectively manage the ecosystem.

NMFS Groundfish Tagging Program: The collection of information for the National Marine Fisheries Service (NMFS) Groundfish Tagging Program has been in operation since the early 1970s. This information collection covers the Groundfish Tagging Program on the West Coast and Alaska. The NMFS Groundfish Tagging Program provides scientists with information necessary for effective conservation, management, and scientific understanding of the groundfish fishery resources off Alaska. Data from the releases and recoveries that are collected through this program have been used to examine movement

patterns, evaluate areal apportionment strategies of annual catch quota, validate ageing methods, and to examine growth.

When a tag is recovered, typical information given by the respondent is: (1) tag number, (2) date of capture, (3) location of capture, (4) size of fish, (5) sex of fish, (6) depth of capture, (7) gear type, (8) vessel name, and (9) name and address of reward recipient. The standard tag recovery form is attached to a prepaid business reply envelope. Individuals use this envelope to submit and record recovery information for each tag. Each recovery envelope contains a confidentiality statement. Submitting tag recovery information is voluntary, and the amount of information received can vary with each recovery.\

Submitting tag recovery information is voluntary. Tags (recovery information) are generally collected from fishermen and processors. Tags can be sent in directly from these individuals, as well as from observers and port samplers with NMFS, the Alaska Department of Fish and Game (ADFG), and Canada Department of Fisheries and Oceans (DFO). Information sent in by NMFS observers includes the vessel captain's signature approving the collection and use of the provided data.

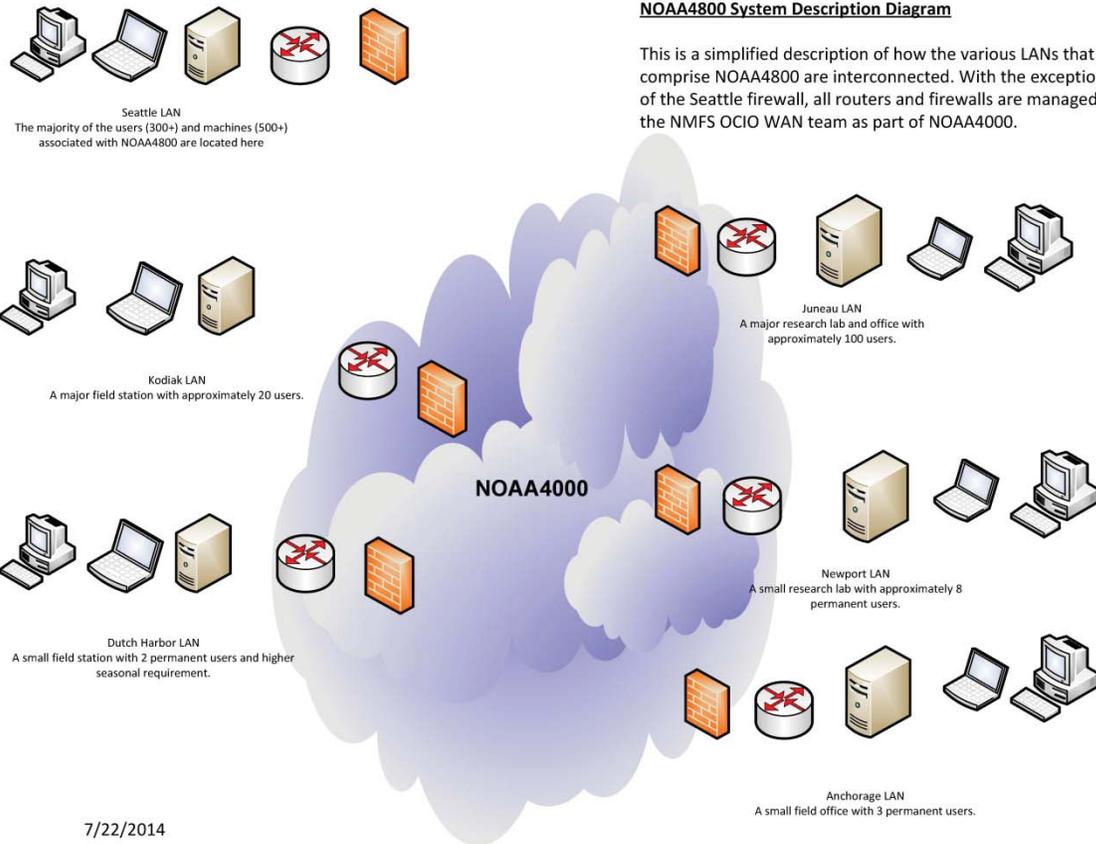
Economic Data Report (EDR) Dataset: The EDR data collection forms collect confidential business data on costs, revenues, ownership, employment, and physical plant characteristics from vessels, processors, and Quota Share permit holders licensed to participate in federally managed crab and groundfish fisheries in Alaska. In addition to business data, the forms also include name, title, telephone and fax numbers, and email address of the person submitting the EDR form; name and address of the owner or leaseholder of the vessel or plant; Federal Fishery processor or vessel permit number, Coast Guard vessel registration number, federal license number, Registered Crab Receiver number, State of Alaska seafood processor number, and ADF&G Commercial Crew License or CFEC Gear Operator Permit number of vessel crew members.

EDR data is collected on an annual basis from vessels, processors, and quota share holders participating in selected catch share programs developed by North Pacific Fishery Management Council and administered by NMFS Alaska Regional Office, specifically, the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, American Fisheries Act pollock fishery, Amendment 80 Non-pollock Groundfish Trawl fishery, and Gulf of Alaska groundfish trawl fisheries. To monitor changes in the economic performance of the affected fisheries following rationalization and subsequent management changes, the NPFMC developed the respective EDR data collections to provide analysts with economic information not available from other sources. The EDR data collections also contribute to meeting the requirements of the MSA for catch share program evaluation.

### **System Specific Information:**

- a) NOAA4800 is a General Support System.
- b) The primary site of NOAA4800 is Seattle, WA. Additional locations are Newport, OR, Juneau, AK, Anchorage, AK, Kodiak, AK, and Dutch Harbor, AK.
- c) NOAA4800 is interconnected with the NMFS LAN (NOAA4000), which provides transport services.

- d) The purpose of the NOAA4800 system is to provide information storage and computational resources for NOAA Fisheries scientists.
- e) In order to achieve its purpose, NOAA4800 provides connectivity between individual end-user computers to infrastructure devices such as files servers, through networking devices such as firewalls, routers, and switches.
- f) NOAA4800 collects, maintains, and uses several types of information, including natural resource data (conservation, marine ecosystems, and mammals), administrative data (budget formulation, budget planning), general workforce management data (number of contractors, contracting budgets, etc.), and information technology data (help desk, infrastructure, system development, and security).
- g) A staff of approximately 500 people composed of biologists, physical scientists, administrative, and support professionals have access to information on the NOAA4800 system.
- h) Information is retrieved from servers to desktop and laptop computers via file sharing technologies.
- i) Information is transmitted locally via file sharing protocols, and externally via NOAA4000.



**NOAA4800 System Description Diagram**

This is a simplified description of how the various LANs that comprise NOAA4800 are interconnected. With the exception of the Seattle firewall, all routers and firewalls are managed by the NMFS OCIO WAN team as part of NOAA4000.

**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.*

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 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.)."

X Yes, the IT system collects, maintains, or disseminates BII about: *(Check all that apply.)*

X Companies

X 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.

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 Alaska Fisheries Science Center (AKFSC) Network 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 Alaska Fisheries Science Center (AKFSC) Network and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO):   Ajith Abraham  

Signature of SO:   ABRAHAM.AJITH.136589 9238   Digitally signed by ABRAHAM.AJITH.1365899238 Date: 2020.03.16 07:55:36 -07'00' Date:   3/16/2020  

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

Signature of ITSO:   AMORES.CATHERINE.S OLEDAD.1541314390   Digitally signed by AMORES.CATHERINE.SOLEIDAD.1541314390 Date: 2020.03.18 14:32:44 -04'00' Date:   3/18/2020  

Name of Authorizing Official (AO):   Jeremy Rusin  

Signature of AO:   RUSIN.JEREMY.DEWITT.1 1380624407   Digitally signed by RUSIN.JEREMY.DEWITT.1380624407 DN: cn=US, o=U.S. Government, ou=DoD, ou=PKI, ou=OTHER, cn=RUSIN.JEREMY.DEWITT.1380624407 Date: 2020.03.16 08:46:43 -07'00' Date:   3/16/2020  

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

Signature of BCPO:   GRAFF.MARK.HYRUM.1 514447892   Digitally signed by GRAFF.MARK.HYRUM.1514447892 Date: 2020.05.04 16:59:35 -04'00' Date:   05/04/2020