U.S. Department of Commerce
NOAA

**Privacy Impact Assessment
for the
Office of National Marine Sanctuaries
NOAA6602**

Reviewed by: __MARK GRAFF_____ , Bureau Chief Privacy Officer

☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
☐ Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

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_____ 08/05/2020
Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer   Date

U.S. Department of Commerce Privacy Impact Assessment
NOAA Office of National Marine Sanctuaries

Unique Project Identifier: 006-48-02-00-01-0511-00

<u>Introduction</u>: 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) Whether it is a general support system, major application, or other type of system

NOAA6602 is an information technology (IT) general support system (GSS) that services all fourteen Office of National Marine Sanctuaries sites nationwide. NOAA6602 is a GSS and stores PII on an ad-hoc basis if and when employees receive documentation as part of the application and hiring of employees, and the processing of HR data about employees. Electronic copies of resumes and hiring ranking are stored temporarily during the hiring phase; in addition, the system temporarily stores COOP information, travel authorization and vouchers, passports and international travel forms, information for the security badging process, and performance appraisal ranking.

(b) System location

The sites that constitute the ONMS are the Silver Spring HQ, Channel Islands, Cordell Bank, American Samoa, Florida Keys, Flower Garden Banks, Gray's Reef, Greater Farallones, Hawaiian Islands Humpback Whale, Monitor, Monterey Bay, Olympic Coast, Stellwagen Bank, Mallows Bay, and Thunder Bay National Marine Sanctuaries and the Papahanaumokuakea Marine National Monument. Each site maintains a file server for storage of scientific data and research. All sensitive data is stored on an ACL controlled file share. ONMS maintains Azure based websites and Azure based applications that may contain non-sensitive PII such as Sanctuary Permit applications and images of people at Sanctuary events. ONMS websites are the only publically accessible location for ONMS information via the internet. Information on the ONMS sanctuary websites may be viewed, over the HTTPS protocol, by the general public.

(c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)

NOAA6602 uses the network services of NOAA6001.
NOAA6602 uses the Security Services of NOAA0100.
NOAA6602 uses the Network Services of NOAA0200.
NOAA6602 Uses the Messaging Operations center NOAA0300.

(d) The way the system operates to achieve the purpose(s) identified in Section 4

OSPREY
An applicant for a research permit downloads the permit application from the ONMS website. Once completed the application is sent by US postal Service or delivered in person to an ONMS facility.

Permit Coordinators at each site enter the completed permit into the OSPREY applications secure web interface. Permit coordinators at each assign a unique number to each permit provide by the OSPREY application. Permit Coordinators at each ONMS site work with the applicant to complete the application and verify the accuracy of the data submitted. The ONMS permit application is assigned to Government agencies, Universities and companies that wish to conduct research within the sanctuaries.

UAS
ONMS recently acquired two PUMA AE Unmanned Aviation System (UAS). The UAS is used to capture photogrammetry (e.g. living marine resources and coastal mapping) and meteorological data. UAS requirements and procedures are documented in the ONMS Privacy Policy and Procedure V4.3 and the ONMS Unmanned Aircraft System Policy & Procedures V4.0. The policies and procedure are updated annually or when changes to the system occur.

Tier 2 Web
NOAA6602 has multiple websites using Tier 2 multi-session cookies that are not collecting PII. The web admin uses the cookies for analytics and for improving the customer experience. The home website for NOAA6602 is http://sanctuaries.noaa.gov and the privacy policy for ONMS is https://sanctuaries.noaa.gov/about/privacy.html.

The use of Tier 2 multi-session cookies that are not collecting PII is a requirement by the Federal CIO (https:// policy.cio.gov/web-policy/analytics), which states:

- All agencies must participate in the General Service Administration's (GSA) Digital Analytics Program DAP and deploy the DAP tracking code on all public facing agency websites. The DAP provides agencies with free quantitative analytics to inform website management. Participation in the DAP does not preclude agencies from using other analytics programs." And

- Agency use of web measurement and customization technologies must comply with OMB Memorandum M-10-22, Guidance for Online Use of Web Measurement and Customization Technologies".

- The Federal CIO provides the mandate to use tier-2 multi-session cookies and/or other technologies for tracking analytics.

Acquisition
ONMS collects and stores limited BII on an ad-hoc basis from businesses or other entities that are providing proprietary information in support of federal acquisition actions. Occasionally there is financial information included with the acquisition package.

HR Data
ONMS, during the hiring process or in assisting employees with travel preparation, uses information stored in the DOC eOPF, EPP, and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data. ONMS follows the DOC and NOAA Policy guidance for HR. Additional requirements or procedures are documented in the ONMS Privacy Policy and Procedure V4.3. The Privacy Policy and Procedure is updated annually or when changes to the system occur.

ONMS Public Websites
ONMS websites are the only publically accessible location for ONMS information. Information on the ONMS sanctuary websites may be viewed, over the HTTPS protocol, by the general public.

(e) How information in the system is retrieved by the user

Scientific data that is collected is published on NOAA6602 websites and in scientific journals.
OSPREY
Permit applications, with the applicant being an institution or organization, are given a unique identifier and are then retrieved using this identifier. Permit data can only be accessed by ONMS permit coordinators, while connected to the NOS internal network. ONMS permit coordinators access the OSPREY application via a Web Browser over the HTTPS.

UAS
Data on the UAS is captured by the UAS on encrypted internal media. The data is retrieved by the ONMS UAS director when the data is directly connected to the PUMA scientific computer. The Puma Scientific computer is not connected to any computer network. Data is first reviewed by the director on the UAS to remove any inadvertent PII prior to the non-PII data being transferred to the Puma scientific computer. The UAS director then hand carries the Non PII data to an ONMS computer. UAS requirements and procedures are documented in the ONMS Privacy Policy & Procedure V4.3 and the ONMS Unmanned Aircraft System Policy & Procedures V4.0. The UAS is also only operated in remote locations to avoid the potential to capture PII. The UAS is flown with Line Of Sight and Ship based Radar is used to verify that there are no other vessels in the vicinity.

HR
ONMS, during the hiring process or to assist employees with travel preparation uses information stored in the DOC eOPF, EPP and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data. All access to this data is over the internal NOAA and DOC networks.

Acquisition data
Acquisition data is stored on an ACL controlled network share and access over the secured NOS network. Access to the data is restricted to the purchasing manager and the IT manager and can only be accessed over the internal NOS network or internally.

ONMS Public Websites

ONMS websites are the only publically accessible location for ONMS information. Information on the ONMS sanctuary websites may be viewed, over the HTTPS protocol, by the general public. Only specific ONMS employees with access approved by the application owner, IT manager and ISSO may modify change or update the data over the internal NOAA network via HTTPS protocol. All images are for public release and may be downloaded by the general public over the HTPPS protocol.

GovDelivery
ONMS uses the NOAA6001 instance of Gove Delivery. This is an online communications tool that delivers public information of interest to customers of ONMS by email. Customers submit their email addresses to ONMS, which staff enter into GovDelivery for mail-outs. Only the email address is kept within the system. Staff use this application to generate and send out newsletters and other materials. The only information stored in Gov Deliver is the email address. This creates a new non-sensitive security risk for ONMS

(f) How information is transmitted to and from the system

OSPREY
All communication, by the permit coordinators, to and from the OSPREY application is via HTTPS protocol.

UAS
The UAS is hand carried from UAS to Scientific workstation.

HR
HR data is stored on the DOC eOPF, EPP and Etravel systems. Administrators access the data over the NOAA secure portal. Data is transmitted to and from the system over HTTPS.

Acquisition data
Acquisition data is stored on an ACL controlled network share and access over the secured NOS network. Data transmission occurs of the NOS secure network.

ONMS Public Websites
ONMS websites are the only publically accessible location for ONMS information. Information on the ONMS sanctuary websites may be viewed, over the HTTPS protocol, by the general public.

GovDelivery
This is an online communications tool that delivers public information of interest by email to customers of ONMS. Customers submit their email addresses to ONMS, which staff enter into GovDelivery for mail-outs. Only the email address is kept within the system. Staff use this application to generate and send out newsletters and other materials.

(g) Any information sharing conducted by the system

OSPREY
NOAA6602 only shares scientific data. Permit data is used internally. Any permit data shared does not include PII.

UAS data is processed then shared internally only.

Acquisition, and GovDelivery data is not shared.
Only data and images designated for public are available on ONMS websites and available for download over HTTPS.

Employee data is stored in the DOC eOPF, EPP and Etravel systems. Only employees with a need and approval my access HR data. ONMS uses the NOAA6001 file services for data storage but does not store PII on the network share. A limited amount of BII may be stored on the NOAA6001 file services in access controlled shares.

(h) The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information

ONMS Public Websites
The ONMS websites are used as a public outreach tool. ONMS websites are the only publically accessible location for ONMS information. Information on the ONMS sanctuary websites may be viewed, over the HTTPS protocol, by the general public.

GovDelivery

GovDelivery is used as a public outreach tool.

OSPREY The Office of National Marine Sanctuaries administers the National Marine Sanctuaries Act, Executive Order 13158, Marine Protected Areas, and other authorities pertaining to designation and management of national marine sanctuaries and marine national monuments.

- The Marine Mammal Protection Act, 16 U.S.C. 1361 et seq.; the Fur Seal Act, 16 U.S.C. 1151 et seq.; and the Endangered Species Act, 16 U.S.C. 1531 et seq.
- Executive Orders 10450, 11478, 12065, 5 U.S.C. 301 and 7531–332; 15 U.S.C. 1501 *et seq.*; 28 U.S.C. 533–535; 44 U.S.C. 3101; Equal Employment Act of 1972; and all existing, applicable Department policies, and regulations.
- E.O. 12107, E.O. 13164, 41 U.S.C. 433(d); 5 U.S.C. 5379; 5 CFR Part 537; DAO 202- 957; E.O. 12656; Federal Preparedness Circular (FPC) 65, July 26, 1999; DAO 210-110; Executive Order 12564; Public Law 100-71, dated July 11, 1987.
- 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.
- 5 U.S.C. 3109, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, and 5533
- Presidential Memorandum: Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems (Feb. 15, 2015); National

Marine Sanctuaries Act, 16 U.S.C. 1431 *et seq.*; Marine Debris Act, 33 U.S.C. 1951 *et seq.;* Coast and Geodetic Survey Act, 33 U.S.C. 883a *et seq.*; Coastal Zone Management Act, 16 U.S.C. 1451 *et seq.*; Coral Reef Conservation Act, 16 U.S.C. 6401 *et seq.*; National Historic Preservation Act, 16 U.S.C. 470 *et seq.*; Ocean Pollution Act, 33 U.S.C. 2701 *et seq.*; Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 *et seq.*; Clean Water Act, 33

- U.S.C. 1251; 47 CFR parts 80, 87, and 95, U.S. Office of Management & Budget (OMB) Circular A–130; the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act); High Seas Fishing Compliance Act of 1995, 16 U.S.C. 5501 *et seq.*; International Fisheries Regulations: Vessels of the United States Fishing in Colombian Treaty Waters: 50 CFR 300.120; the FAA Modernization and Reform Act of 2012 (Pub. L. 112–95); the American Fisheries Act, Title II, Public Law 105–277; the Atlantic Coastal Fisheries Cooperative Management Act of 1993, 16 U.S.C. 5101–5108, as amended 1996; the Tuna Conventions Act of 1950, 16 U.S.C. 951–961; the Atlantic Tunas Convention Authorization Act, 16 U.S.C. Chapter 16A; the Northern Pacific Halibut Act of 1982, 16 U.S.C. 773 *et seq.* (Halibut Act), the Antarctic Marine Living Resources Convention Act of 1984, 16 U.S.C. 2431– 2444 and the Debt Collection Improvement Act, 31 U.S.C. 7701.

- National Marine Sanctuaries Act, Section 301(b)(2):

  The act "provide[s] authority for comprehensive and coordinated conservation and management of these marine areas, and activities affecting them"

  Conserving and managing these marine areas requires communicating about them, which requires a web presence. As many elements of conservation and management involve people, as do activities affecting them, it is important to be able to *show* people interacting with sanctuary ecosystems in various ways.

- Section 301(b)(4):

  The act tasks ONMS with "enhancing public awareness, understanding, appreciation, and wise and sustainable use of the marine environment, and the natural, historical, cultural, and archeological resources of the National Marine Sanctuary System."

  To enhance public awareness and understanding we must first of all have a web presence. Using photos of people enables us to communicate elements of understanding, appreciation, and sustainable use of the marine environment. Photos of people are also often essential to demonstrating the historical and cultural context of these places.

- Section 309(c)(1)

  "The Secretary may support, promote, and coordinate efforts to enhance public awareness, understanding, and appreciation of national marine sanctuaries and the System."

  Photographs of people enable us to support existing public awareness, understanding, and appreciation of the system while also promoting future public awareness, understanding, and appreciation.

- Section 301(c)(2)

  Activities under this subsection may include education of the general public, teachers, students, national marine sanctuary users, and the ocean and coastal resource managers."

  Photographs of people are often necessary for such education.

COMMERCE/DEPT-9: Travel Records (Domestic and Foreign) of Employees and Certain Other Persons. Budget and Accounting Act of 1921; Accounting and Auditing Act of 1950; and

Federal Claim Collection Act of 1966.
COMMERCE/NOAA12 Marine Mammals, Endangered and Threatened Species, Permits and Authorizations Applicants.
COMMERCE/DEPT-13, Investigative and Security Records.
COMMERCE/DEPT-18, Employees Personnel Files Not Covered by Notices of Other Agencies
COMMERCE/DEPT-29, Unmanned Aircraft Systems
OPM/ GOVT-5, Recruiting, Examining, and Placement Records
COMMERCE/NOAA11 Contact Information for Members of the Public Requesting or Providing Information Related to NOAA's Mission

(i) The Federal Information Processing Standards (FIPS) 199 security impact category for the system

ONMS is a FIPS 199 Moderate Security risk.

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 in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment.

_____   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).

__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 01-2017 or later).

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*		f. Driver's License	X	j. Financial Account	
b. Taxpayer ID		g. Passport	X	k. Financial Transaction	
c. Employer ID		h. Alien Registration	X	l. Vehicle Identifier	
d. Employee ID		i. Credit Card		m. Medical Record	
e. File/Case ID					
n. Other identifying numbers (specify):					
The above information is only collected to assist employees with making travel arrangement. Paper copies are temporarily stored in a locked file cabinet and destroyed when no longer needed.					

General Personal Data (GPD)					
a. Name	X	h. Date of Birth		o. Financial Information	X
b. Maiden Name		i. Place of Birth		p. Medical Information	
c. Alias		j. Home Address	X	q. Military Service	
d. Gender		k. Telephone Number	X	r. Criminal Record	
e. Age		l. Email Address	X	s. Physical Characteristics	
f. Race/Ethnicity		m. Education		t. Mother's Maiden Name	
g. Citizenship		n. Religion			
u. Other general personal data (specify):					

The **OSPREY** application collects the Applicant's name Business or Institution Mailing Address, Business or Institution Phone Number and Business or Institution email address. The potential exists for an applicant to provide personal information and is being included in this section as well as the work related data section. The applicant must provide the following information: (1) the names, addresses, and telephone numbers of owner, captain, and applicant; (2) vessel name and home port; (3) USCG documentation number, state license, or boat registration number; (4) Length of vessel and primary propulsion type (i.e., motor or sail); (5) Number of divers aboard; and (6) Requested effective date and duration of permit.

The **UAS** does not collect any of the above data types.

GovDelivery only collects email addresses.
HR Data is stored in the DOC HR system.

Work-Related Data (WRD)					
a. Occupation	X	e. Work Email Address	X	i. Business Associates	
b. Job Title	X	f. Salary		j. Proprietary or Business Information	
c. Work Address	X	g. Work History	X		
d. Work Telephone Number	X	h. Employment Performance Ratings or other Performance Information	X		
k. Other work-related data (specify):					

The OSPREY application collects the above checked data types.
The UAS does not collect any of the above data types.
ONMS, during the hiring process or to assist employees with travel preparation uses information

stored in the DOC eOPF, EPP and Etravel systems. ONMS also uses the NOAA staff directory for employee information.
ONMS does not use paper copies for HR data.

GovDelivery only collects email addresses.
HR Data is stored in the DOC HR system.

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): ONMS places photographic images on their web site. ONMS web sites contain images of staff, volunteers and affiliates, guest and visitors to ONMS sites. These include photographs and videos of events and interviews that occur at our sites.					

System Administration/Audit Data (SAAD)					
a. User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	
b. IP Address		d. Queries Run		f. Contents of Files	
g. Other system administration/audit data (specify): The NOAA6602 OSPREY application uses the NOAA ICAM to authenticate the permit coordinators. Only ONMS permit coordinators have access to the OSPREY application Auditing of ONMS permit coordinator access is sent to NOAA ArcSight. ArcSight records User ID, date, and time of access to the OSPREY system.					

Other Information (specify)

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		Email			
Other (specify):Gov Delivery User email addresses are submitted online from the ONMS websites. Osprey is located in the ONMS instance of the OSPREY cloud.					

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

Non-government Sources					
Public Organizations		Private Sector	X	Commercial Data Brokers	
Third Party Website or Application					
Other (specify): Procurement data is provided in proposals and other procurement documents					

2.3 Describe how the accuracy of the information in the system is ensured.

OSPREY

The completion of ONMS permits is an interactive task completed by the applicant and the ONMS permit coordinator. The permit process is accomplished over multiple weeks and requires interaction between the applicant and permit coordinator. During this process, the permit coordinator contacts the applicant via Email and phone calls and verifies information provided.

Acquisitions

Acquisition data is reviewed by the contracting officer. Data is verified by the contracting officer contacts via Email and phone calls; this process is used to verify information provided by the vendor.

HR Data

ONMS, during the hiring process or to assist employees with travel preparation uses information stored in the DOC eOPF, EPP and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data.

HR data is validated at the time of hiring by the HR representative. The HR representative compares picture ID and other information to validate the applicant's identity.

For travel, the HR representative also validates the users Driver's License and Passport if necessary.

HR data for travel is only used to assist the employee in making travel arrangements and is not stored.

GovDelivery

The communications team reviews user data at least annually through user audits. If the data is outdated, the email audit will return an undeliverable message and admin deletes the user from the database. The user can also reply that they would like to be removed from the system or use the unsubscribe function in the email. The administrators review users' data prior to inputting into the system and the user reviews their data at various points in the process.

UAS

The ONMS UAS is used for mapping the ONMS sanctuaries in remote locations and is not used as a source for PII.

2.4 Is the information covered by the Paperwork Reduction Act?

X	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection. OMB Control Numbers: • 0648-0141, National Marine Sanctuary Permits • 0648-0625 Socioeconomic Research & Monitoring for the Gray's Reef National Marine

	Sanctuary • 0648-0432 Dr. Nancy Foster Scholarship Program revision/extension • 0648-0763 Economic Value of Wildlife Viewing Passengers in Stellwagen Bank National Marine Sanctuary (SBNMS) • 0648-0397 Application Form for Membership on a National Marine Sanctuary Advisory Council - Youth Membership Application change request • 0648-0719 National Oceanic and Atmospheric Administration's Papahanaumokuakea Marine National Monument and University of Hawaii Research Internship Program • 0648-0582 Evaluation of Public Visitors' Experience of Exhibits at Mokupapapa Discovery Center extension • 0648-0777 Economic Value of Wildlife Viewing Passengers in Stellwagen Bank National Marine Sanctuary (SBNMS)
	No, the information is not covered by the Paperwork Reduction Act.

2.5 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) The UAS has the potential to temporarily contain PII.			

	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.

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	X	Electronic purchase transactions	
Other (specify): **UAS Only** Although the ONMS UAS has the potential to collect PII via video surveillance, it is not the purpose of the device and any PII captured is immediately deleted. The UAS is also only operated in remote locations to avoid the potential to capture PII. The UAS is flown with Line Of Sight and Ship based Radar is used to verify that there are no other vessels in the vicinity. **Security System.** ONMS Flower Garden Banks office recently installed a new security system which includes video security cameras. The video footage can only be viewed on an isolated network and is only shared with law enforcement. Signage is posted. The system adds minimal new privacy risk.			

	There are not any IT system supported activities which raise privacy risks/concerns.

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			
For a Computer Matching Program		For administering human resources programs	X
For administrative matters	X	To promote information sharing initiatives	X
For litigation		For criminal law enforcement activities	
For civil enforcement activities		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)	X

Other (specify):
ONMS
Both the National Marine Sanctuaries Act and ONMS regulations prescribe procedures by which certain activities that would otherwise be prohibited may be conducted through the issuance of a permit. Any person proposing to conduct an activity prohibited by ONMS regulations must apply for and receive a permit prior to conducting that activity. There are nine types of permits, including those for research, education, and special use activities.

HR: ONMS, during the hiring process or to assist employees with travel preparation uses information stored in the DOC eOPF, EPP and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data. ONMS also uses HR information such as travel authorization and vouchers, passports and international travel forms, and information for transmitting the security badge request email

Information sharing:
NOAA6602 has multiple websites using Tier 2 multi-session cookies that are not collecting PII. The web admin uses the cookies for analytics and for improving the customer experience. The use of Tier 2 multi-session II is a requirement by the Federal CIO (https://policy.cio.gov/web-Policy/analytics). Information shared is scientific data only.

Photographic images on Web sites
ONMS collects and displays photographs on their websites in support of the education and outreach portion of the National Marine Sanctuaries act.

- Portions of the National Marine Sanctuary provide[s] authority for comprehensive and coordinated conservation and management of these marine areas, and activities affecting them"
  Conserving and managing these marine areas requires communicating about them, which requires a web presence. As many elements of conservation and management involve people, as do activities affecting them, it is important to be able to show people interacting with sanctuary ecosystems in various ways.
- Section 301(b)(4):
  The act tasks ONMS with "enhancing public awareness, understanding, appreciation, and wise and sustainable use of the marine environment, and the natural, historical, cultural, and archeological resources of the National Marine Sanctuary System."
  To enhance public awareness and understanding we must first of all have a web presence. Using photos of people enables us to communicate elements of understanding,

> appreciation, and sustainable use of the marine environment. Photos of people are also often essential to demonstrating the historical and cultural context of these places.
> - Section 309(c)(1)
>   "The Secretary may support, promote, and coordinate efforts to enhance public awareness, understanding, and appreciation of national marine sanctuaries and the System."
>   Photographs of people enable us to support existing public awareness, understanding, and appreciation of the system while also promoting future public awareness, understanding, and appreciation.
> - Section 301(c)(2)
>   "Activities under this subsection may include education of the general public, teachers, students, national marine sanctuary users, and the ocean and coastal resource managers."
>   Photographs of people are often necessary for such education.

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).

ONMS collects and stores limited BII on an ad-hoc basis from businesses or other entities that are providing proprietary information in support of federal acquisition actions. Occasionally there is financial information included with the acquisition package. ONMS

ONMS, during the hiring process or to assist employees with travel preparation uses information stored in the DOC eOPF, EPP and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data. This includes electronic copies of resumes stored temporarily during the hiring phase. Also stored temporarily are standard HR information such as travel authorization and vouchers, passports and international travel forms, and information for transmitting the security badge request email, which includes only an email address and possibly a phone number.

UAS
ONMS recently acquired a UAS for use in mapping photogrammetry living marine resources and coastal mapping and meteorological data. ONMS' use of the UAS is covered by the DOC SORN and the NOAA Policy. The UAS would be exclusively operated in remote areas and is not authorized to operate above people or structures. The UAS is flown line of sight to prevent the inadvertent capture of PII. Ship based radar is also used to ensure the flight area is free of other vessels. Any privacy data that is inadvertently collected will be immediately deleted.

OSPREY
1. The ONMS permit system, OSPREY, is used to generate permits for multiple types of

activities within the ONMS Sanctuaries. A brief description of some permits are as follows:

(a) General Permits

Scope of this category. This category includes all permits not specifically addressed in subsections (b) through (j) below; typically, permit applications for scientific research, education, management, and salvage (excluding activities aimed at historical resources) activities permits fall into this category. This category also includes requests for authorizations of other agency permits processed pursuant to 15 CFR §922.49.

(b) Baitfish Permits

Scope of this category. This category includes applications for permits to collect baitfish in certain Sanctuary Preservation Areas (SPAs) of the Florida Keys National Marine Sanctuary that are otherwise closed to fishing. There are two types of baitfish permits that may be issued depending on the gear used (castnet or hairhook).

(c) Special Use Permits

Scope of this category. This category includes all permit applications processed under section 310 of the NMSA (16 U.S.C. §1441). Activities must be noticed in the Federal Register before NOAA can issue special use permits for those activities. Presently, these activities are as follows:

- The disposal of cremated human remains by a commercial operator in any national marine sanctuary
- The operation of aircraft below the minimum altitude in restricted zones of national marine sanctuaries for commercial purposes
- The placement and subsequent recovery of objects associated with public events on non-living substrate of the seabed
- The discharge and immediate recovery of objects related to special effects of motion pictures; and
- The continued presence of submarine cables beneath or on the seabed.

(d) Historical Resource Permits

Scope of this category. This category includes all permit applications for activities aimed at historical, cultural, and/or maritime heritage resources of sanctuaries.

(e) Certification

Scope of this category. This category includes all requests for the ONMS to certify activities that are being conducted pursuant to a valid government authorization prior to a sanctuary being designated (commonly known as "grandfathered" activities).

(f) Voluntary Registry

Scope of this category. This category is for researchers who are conducting activities that are not otherwise prohibited. The registry allows them to register their activity, which adds to the database of research activities within a sanctuary.

(g) Tortugas Access Permits

Scope of this category. In 2001, NOAA established the Tortugas Ecological Reserve in the Florida Keys National Marine Sanctuary. Regulations implementing the reserve include

controlling access to the reserve through the granting of "access permits" (15 CFR §922.167). Applicants give their information and receive their permit orally, via phone or VHF radio, prior to entering the reserve.

(h) Lionfish Permits
Scope of this category. Florida Keys National Marine Sanctuary encourages the safe removal of invasive lionfish from its waters and issues lionfish removal permits to divers for the collection of lionfish from Sanctuary Preservation Areas (SPAs). The permit allows lionfish to be removed from the SPAs, which are otherwise no-fishing, no-take zones, with hand nets or slurp guns only. Spear guns or pole spears may not be used. This permit does not allow lionfish removal from the Ecological Reserves or the four Special-use Research Only Areas.

2. When designating each sanctuary, NOAA consulted with the relevant states and Federal agencies regarding their permitting requirements and procedures. Where appropriate, agreements were put in place to use a coordinated permit process. Post-designation, the ONMS continuously works with other state and Federal agencies to identify and eliminate duplication of permit requirements or conditions and, when appropriate, coordinate reviews of applications. In addition, the ONMS routinely accepts information developed for other purposes (e.g., a report on an activity developed for another agency) as part of an ONMS permit application or to meet requirements of an ONMS permit condition.

When designating each sanctuary ONMS reviews public comment on the Federal Register. ONMS does not directly solicit public comment.

ONMS Public Websites

ONMS uses photographs on our websites to:
1. Illustrate main points and support textual information;
2. Provide visual interest; and
3. Show examples of sanctuary wildlife, locations, and forms of compatible use and engagement with the resources.

We use a variety of images of people on our websites. Some are from sanctuary events (like wildlife watching tours or SAC meetings); others are photos the ONMS production team takes; others are submitted via the photo contest.

Images of people support all of those uses. They support textual information about recreation, science and citizen science, volunteering, and other programs. They provide visual interest to the reader. And they are essential for showing forms of compatible use, engagement with sanctuary resources (wildlife watching, science, recreation, volunteer activities, commercial activities such as fishing, etc.), and sanctuary programming.

ONMS only publishes photographic images of individuals and children that they have signed releases for. ONMS publishes images of large crowds where individuals do not expect to have a right to privacy. At large crowd events signage is posted alerting individuals that photography is in use and they can inform ONMS if they do not wish to be photographed or have their image posted on the ONMS website.

GovDelivery:
ONMS uses GovDelivery to provide information to constituents on information about ONMS. Constituents may sign up for various ONMS newsletters. ONMS only collects email addresses and the newsletter the constituent wishes to receive. ONMS does not associate any other information with this PII collection.

5.2   Describe any potential threats to privacy, such as insider threat, as a result of the bureau's/operating unit's use of the information, and controls that the bureau/operating unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

If users print information from the system, there is a chance that privacy data will be viewed if the document is left in plain sight.

Old data is purged from the systems per retention schedule.

Users take privacy training at least annually in the required annual security awareness course.

Users sign rules of behavior to ensure they understand their responsibilities.

UAS
NOAA6602 owns two PUMA AE. The data captured by the Puma AE is encrypted through the ground control system. This is current military grade hardware. In order to fully exploit the data, it must be converted from the proprietary software and saved into commonly accessible formats. If the UAS was lost, data can only be decrypted by the by the Puma base unit when the UAS is connected to it. The UAS has the potential to collect PII if it inadvertently flies over an individual. The UAS is flow by line of sight and by using ship based radar to insure no other vessels are in the vicinity.

ONMS Public Websites
Photographic images on Web sites

ONMS uses photographs on our websites to:
1. Illustrate main points and support textual information;
2. Provide visual interest; and
3. Show examples of sanctuary wildlife, locations, and forms of compatible use and engagement with the resources.

Images of people support all of those uses. They support textual information about recreation, science and citizen science, volunteering, and other programs. They provide visual interest to the reader. And they are essential for showing forms of compatible use, engagement with sanctuary resources (wildlife watching, science, recreation, volunteer activities, commercial activities such as fishing, etc.), and sanctuary programming.

We use a variety of images of people on our websites. Some are from sanctuary events (like wildlife watching tours or SAC meetings); others are photos the ONMS production team takes; others are submitted via the photo contest.

The National Marine Sanctuaries Act, Section 301(b)(4), tasks ONMS with "enhanc[ing] public awareness, understanding, appreciation, and wise and sustainable use of the marine environment, and the natural, historical, cultural, and archeological resources of the National Marine Sanctuary System." Using photos of people enables us to communicate elements of understanding, appreciation, and sustainable use of the marine environment. Photos of people are also often essential to demonstrating the historical and cultural context of these places.

ONMS only publishes photographic images of individuals and children that they have signed releases for. ONMS publishes images of large crowds where individuals do not expect to have a right to privacy. At large crowd events signage is posted alerting individuals that photography is in use and they can inform ONMS if they do not wish to be photographed or have their image posted on the ONMS website.

GovDelivery:
GovDelivery collects email addresses and the data the email address wishes to receive. There is a minimal PII risk if the email address was leaked.

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

*Includes instances of security or privacy breach.

	The PII/BII in the system will not be shared.

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	Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: NOAA6602 Uses the NOAA0100 for the reporting of security incidents. NOAA6602 uses the NOAA0200 Network Operations center for its network connectivity. NOAA6602 uses the NOAA0300 Messaging Operations Center for Email communication and ICAM authentication. NOAA6602 Uses NOAA6001 for Management of Network devices and for Network services
	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): **OSPREY** The PII is only accessed by ONMS employees.			

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: https://sanctuaries.noaa.gov/about/privacy.html	
X	Yes, notice is provided by other means.	Specify how: **COOP** information is provided in hard copy form only to the users performing roles in the COOP function (ACIO, deputy ACIO, ISSO and CTO). Any employee data for the COOP is gathered from the employee on a voluntary basis when they agree to take the position. **HR**: Applicants and employees: all federal forms provide notice, including Privacy Act Statements. **Acquisition:** Notice is given through solicitations. **Photographs on Web Pages** Photographic releases are obtained for all images of individuals except group photographs taken at site events. Parental consent release forms are obtained

		for any image of children under the age of 18.
		We do not get release forms where the individual is not covered by the right to privacy example public beach and group events.
		https://sanctuaries.noaa.gov/about/privacy.html
		UAS
		ONMS does not use the UAS to capture images of individuals. All UAS are operated in remote locations. ONMS uses ship based radar and line of site operations to prevent the capture of images of individuals. In the rare event that an image of an individual was captured, it would be deleted.
		GovDelivery:
		Gov. Delivery is a voluntary submission. ONMS does not solicit the information. If a Constituent wishes to participate the constituents may choose to subscribe by providing and email address to subscribe to ONMS newsletters. On the subscription page the constituent has the option to delete their account if the subscription is by accident. All ONMS web pages including the subscription page contain a link to the ONMS privacy policy. ONMS privacy policy https://sanctuaries.noaa.gov/about/privacy.html
		OSPREY
		Only approved ONMS employees may access the OSPREY database. The ONMS, NOS and NOAA privacy policies are linked to the sign in page. https://sanctuaries.noaa.gov/about/privacy.html https://osprey.nos.noaa/privacy.html This link is internal to the OSPREY application and only accessible if the user has permission. See attached screen shots. https://www.noaa.gov/protecting-your-privacy
	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: **HR** Federal employees may decline in writing to provide PII to their supervisors, but this may affect their employment. **Acquisition** Businesses provide information related to procurement activities on a voluntary basis through proposals. All information received from businesses is handled in the manner dictated by the federal acquisition regulations (FAR). Information is

		provided on a voluntary basis through individuals who provide their business cards. If they do not want to be placed in the database, they do not provide business cards. **Photographs on Web Pages** The individual can request to have the image removed from the web site. **GovDelivery**: Gov. Delivery is a voluntary submission. ONMS does not solicit the information. If a Constituent wishes to participate the constituents may choose to subscribe by providing and email address to subscribe to ONMS newsletters. On the subscription page the constituent has the option to delete their account if the subscription is by accident. All ONMS web pages including the subscription page contain a link to the ONMS privacy policy. In addition an email is sent to the email address provided confirming the subscription and provides a link to unsubscribe. **UAS** ONMS does not use the UAS to capture images of individuals. All UAS are operated in remote locations. ONMS uses ship based radar and line of site operations to prevent the capture of images of individuals. In the rare event that an image of an individual was captured, it would be deleted. **OSPREY** Permits to conduct activities in an ONMS sanctuary are received in person or via US mail. If an applicant does not wish to provide PII, they do not submit a permit application.
	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.	Specify how: **HR** Applicants for positions who have applied through the USAJobs system are able to consent to the use of their information in the system. Applicants for positions through contractor companies consent to the use of their information through their companies. For ongoing employee business, such as travel, the user consents to the use of their information by submitting travel requests to their admins.

| | | **Acquisition**
Businesses provide information related to procurement activities on a voluntary basis through proposals. All information received from businesses is handled in the manner dictated by the federal acquisition regulations (FAR).

Photographs on Web Pages
The proposed use of the photographic image is described in the ONMS release form. Individuals may decline to have their image used on an ONMS website by not signing the image release form.

GovDelivery:
Gov. Delivery is a voluntary submission. ONMS does not solicit the information. If a Constituent wishes to participate the constituents may choose to subscribe by providing and email address to subscribe to ONMS newsletters. The link to the ONMS privacy policy is provided on all ONMS web pages and provides information on the use of PII. Users can unsubscribe on the subscription page or by the link on all emails sent to the constituent if they do not consent to the use of the information.

UAS
ONMS does not use the UAS to capture images of individuals. All UAS are operated in remote locations. ONMS uses ship based radar and line of site operations to prevent the capture of images of individuals. In the rare event that an image of an individual was captured, it would be deleted.

OSPREY
Permits to conduct activities in an ONMS sanctuary are received in person or via US mail. The use of the PII collected is explained in the permit application. If the applicant does not consent to the use of the PII they do not have to submit the application. |
| | 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.

	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how: **HR** Applicants apply for positions through USA Jobs which allows the applicant to review and update information until the position closes. Contract employees initiate the change through their contracting company in person. Once an employee is hired, all

| | | changes and updates are made directly to the employee's HR representative.

Acquisition
The business works closely with the purchasing manager and any updates are made directly to the purchasing manager, in writing.

Photographs on Web Pages
An individual may request to have their image removed from an ONMS website at any time by contacting ONMS.

GovDelivery:
All emails sent to ONMS constituents contain a link for individuals to modify or cancel their subscription. The confirmation email from GovDelivery also contains instructions of how to manage or delete subscriptions.

UAS
ONMS does not use the UAS to capture images of individuals. All UAS are operated in remote locations. ONMS uses ship based radar and line of site operations to prevent the capture of images of individuals. In the rare event that an image of an individual was captured, it would be deleted.

OSPREY
Permits to conduct activities in an ONMS sanctuary are reviewed multiple times by the applicant and the ONMS permit coordinator. The permit process can take many months to complete where the applicant can review and correct any information even after the approval of the permit. |
| | 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.)*

	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: Acquisition data is monitored and tracked temporarily until a procurement is concluded. It is kept on shared drives, access to which is restricted by access control lists (ACLs). Laptop tops are configured with full disk encryption. If PII is kept on a laptop, the data is encrypted. NOAA6602 restricts access to shared folders by ACL. PII is not centralized in a database, and it cannot be easily monitored for access. However, as stated above, the access to the shared folders is restricted by ACL. Employee evaluations and potential employee resumes are monitored and tracked temporarily, until transfer to the NOAA OHCS. They are kept on shared drives, access to which is restricted by ACL. NOAA policy requires users not to keep data on their local drives. Policy indicates that they should use restricted folders on the shared drive. Policy also requires users to remove all PII from their file share when no longer needed. The OSPREY application is located in an encrypted database stored in the ONMS instance of AZURE. Access to the OSPREY Application and Database is controlled by ICAM.
X	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): 8-27-2019 ☐ 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 (POA&M).
X	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
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 DOC 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. *(Include data encryption in transit and/or at rest, if applicable).*

OSPREY
The ONM Permit application (OSPREY) is hosted on a database. All communication with the application is using encryption for data in transit. Only approved Permit coordinators are allowed access to the OSPREY system. User access to the OSPREY database is controlled by NOAA enterprise directory. All access audit trails are uploaded to the NOAA enterprise audit logging solution, Audit solution.

UAS

The UAS system stores data on an encrypted SD card. All data is over written or the SD card is destroyed once the data is removed from the SD card.

HR

ONMS, during the hiring process or in assisting employees with travel preparation, uses information stored in the DOC eOPF, EPP, and Etravel systems. ONMS also uses the NOAA staff directory for employee information. ONMS does not use paper copies for HR data.
ONMS follows the DOC and NOAA Policy guidance for HR.

Acquisition

Digital Acquisition data is stored on an ACL controlled networks file share accessible only by contract specialists. Paper copies of acquisition materials are stored in an access controlled file cabinet.

All PII and BII are encrypted at rest.

Section 9: Privacy Act

9.1   Is the PII/BII searchable by a personal identifier (e.g, name or Social Security number)?

  X   Yes, the PII/BII is searchable by a personal identifier.

      No, the PII/BII is not searchable by a personal identifier.

Photographs on Web Pages

A limited number of photographic images have the individual's name associated. Written consent is received from the individual, informing the individual of the use of the image and the need for the individuals name, prior to placing the image on an ONMS website.

Only images of individuals with a signed model release and ONMS staff.

9.2   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."

Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. *(list all that apply)*: COMMERCE/DEPT-9. Travel Records (Domestic and Foreign) of Employees and Certain Other Persons. NOAA12 Marine Mammals, Endangered and Threatened Species, Permits and Authorizations Applicants. COMMERCE/DEPT-13, Investigative and Security Records. COMMERCE/DEPT-18, Employees Personnel Files Not Covered by Notices of Other Agencies; COMMERCE/DEPT-29, Unmanned Aircraft Systems; OPM/GOVT-5, Recruiting, Examining, and Placement Records COMMERCE/NOAA11 Contact Information for Members of the Public Requesting or Providing Information Related to NOAA's Mission

	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u>.
	No, this system is not a system of records and a SORN is not applicable.

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: NOAA Records Schedules Chapter 1609 Marine Sanctuaries Chapter 2200 Records of the Chief Information Officer Chapter 2300 General Information Technology Management Record Chapter 2400 Information System Security Records **UAS** All data is over written or the SD card is destroyed once the data is removed from the SD card. Any PII collection is incidental, unintentional, and not retained. See DEPT-29, Section 9.1
	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.)*

Disposal			
Shredding	X	Overwriting	X
Degaussing		Deleting	X
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Level

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. *(The PII Confidentiality Impact Level is not the same, and does not have to be the same, as the Federal Information Processing Standards (FIPS) 199 security impact category.)*

	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.)

X	Identifiability	Provide explanation: Individuals may be identified by the provision of their contact information A limited number of individuals may be identified by name on ONMS websites.
X	Quantity of PII	Provide explanation: There is a small quantity of PII. There are a limited number of photographic images that identify individuals.
X	Data Field Sensitivity	Provide explanation: Acquisition and performance ratings.
X	Context of Use	Provide explanation: **OSPREY** permit data is used to generate permits for activity conducted within one of the ONMS sanctuary. **UAS** Data is used to produce wildlife maps. **Photographs on Web Pages** Prior to publication individuals are informed of the use of their images on ONMS websites. **GovDelivery** Users who submit their email address can opt out at any time. **HR Data** ONMS uses HR data temporarily to assist with travel and in the hiring process. All HR data is stored in the DOC HR systems. **Acquisitions** ONMS uses acquisition BII in awarding contracts..
X	Obligation to Protect Confidentiality	Provide explanation: Acquisition Per the FAR, Procurement Integrity Act, and Economic Espionage Act
X	Access to and Location of PII	Provide explanation: **OSPREY** Data is stored in a database with restricted access to the database. Permit coordinators are granted access to the database after review by the IT manager, OSPREY manager and ISSO. **UAS** The UAS data is only transferred by a UAS pilot and can only be transferred to an ONMS scientific workstation. **Photographic Images on Websites**. Images of individuals are stored in access controlled, encrypted and isolated NAS devices. Access is limited to specific ONMS employees. Photographic images published on ONMS websites can only be updated by the ONMS web admin. All images published on ONMS websites are available to the general public. **GovDelivery** The GovDelivery databases stores email addresses only and is managed by NOAA6001. **HR Data** ONMS uses HR data temporarily to assist with travel and in the

		hiring process. All HR data is stored in the DOC HR systems. **Acquisitions** ONMS uses acquisition BII in awarding contracts.
X	Other:	Provide explanation: **GovDelivery** The GovDelivery databases stores email addresses only.

Section 12: Analysis

12.1   Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

ONMS re-evaluated the system impact level (FIPS-199) and upgraded the FISMA system impact level to Moderate. The data fields that are implemented were reviewed on multiple occasions to ensure that only the necessary data is collected, especially PII. The ONMS ISSO is included in all meetings.

OSPREY
The ONMS ISSO works closely with the OSPREY team to ensure the application only collects the minimal amount of data. The ONMS permit application specifically requests Business address, phone number and email address, however, due to the potential that an applicant may inadvertently supply PII, ONMS protects the OSPREY application at the higher more secure level.

UAS
The UAS has a low risk of threat to privacy since it is operated only in remote locations and is not authorized above buildings or people. The UAS is flow by line of sight and by using ship based radar to insure no other vessels are in the vicinity.

12.2   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.

12.3   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.