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

Privacy Threshold Analysis
for the
CEN 26 SharePoint
U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau CEN26 SharePoint

Unique Project Identifier: [Number]

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: Provide a general description (in a way that a non-technical person can understand) of the information system that addresses the following elements:

The E-Government Act of 2002 defines “information system” by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: “Information system” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

(a) Whether it is a general support system, major application, or other type of system

CEN26 Sharepoint is a major application that consists of two environments, an on-premise environment known as SharePoint 2016 and a cloud environment known as SharePoint Online.

(b) System location

The on-premise environment, SharePoint 2016, resides at the Bowie Computing Center in Bowie, Maryland. The cloud environment, SharePoint Online, resides in Microsoft O365 Government Community Cloud (GCC) located in Redmond, Washington.

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

CEN26 Sharepoint interconnects with infrastructure services at the U.S. Census Bureau. This includes CEN01 for authentication/telecommunication purposes, CEN16 for server/storage/authentication, and CEN17 for laptops and workstations.

(d) The purpose that the system is designed to serve

The purpose of CEN26 Sharepoint is for administrative matters and to promote information sharing activities.

(e) The way the system operates to achieve the purpose
Microsoft SharePoint Online and SharePoint 2016 are a collection of Web-based tools and technologies that help users store, share, and manage digital information within an organization. The SharePoint platform allows developers to create sites for various purposes such as document management, workflow automation, web portals, intranets, as well as others. SharePoint consists of hundreds of site collections throughout the U.S. Census Bureau. Each site collection has a site collection administrator and/or site owner. The information on each site is managed by site collection administrators/site owners and are governed by a governance policy.

SharePoint solutions for internal users will utilize CEN16 Windows Active Directory for identification and authentication of users.

SharePoint solutions for external users will utilize the CEN01 Census Public Access Security System (C-PASS). C-PASS collects and requests account information, as well as user passwords. C-PASS focuses on meeting requirements to allow external users to securely authenticate and consume Census controlled data and services. The system provides supporting services required to allow controlled access to Census data, which is only available to approved individuals.

CEN26 hosts the Commerce Accommodation Tracking System (CATS). The purpose of the CATS is to record, track, and manage reasonable accommodation requests submitted by Department of Commerce employees. The CATS collects personally identifiable information (PII) including names, telephone number, and email address in order to track and process reasonable accommodation requests for contractors and employees with temporary or permanent disabilities. Although the tracking system does not request specific medical information, individuals may voluntarily enter specific medical information about themselves regarding their medical disabilities. The information entered is used solely by appropriate Department of Commerce employees who have a business need to know in the performance of official duties to satisfy reasonable accommodation requests.

In addition, CEN26 will host an electronic signature application. The employees will use their PIV cards to sign electronic documents. The application prompts employees to enter their PIN, and it will use the public certificate stored in their PIV cards to sign the electronic documents. This privacy impact assessment reflects all personally identifiable information (PII) that is requested by the Census Bureau that will be use, dissemination, or storage within this IT system.

(f) A general description of the type of information collected, maintained, use, or disseminated by the system

SharePoint (internal) may be used to collect or store PII/BII information for administrative purposes: SharePoint provides account management for employees and contractors. SharePoint collects information on employees and contractors for account purposes.
SharePoint (external) may be used to collect or store PII/BII information from members of the public for sharing initiatives: The external SharePoint platform is used to encourage collaboration between other federal agencies, universities, research agencies, etc… and the Census Bureau. Individuals from federal agencies, research agencies, and universities that will be using the external SharePoint sites will go through an approval process before they can be granted access to a specific portion of the extranet SharePoint site. They are authorized using CPASS and will login via a username and password. The PII collected for this purpose includes name, phone number, and email address from individuals that need access to the external SharePoint sites. The PII collected is shared only with Department of Commerce employees who have a business need to know.

The CATS collects personally identifiable information (PII) including names, telephone number, and email address in order to track and process reasonable accommodation requests for contractors and employees with temporary or permanent disabilities. Although the tracking system does not request specific medical information, individuals may voluntarily enter specific medical information about themselves regarding their medical disabilities.

(g) Identify individuals who have access to information on the system

Census Bureau employees and contractors have access to the internal Sharepoint solution. The external SharePoint platform is used to encourage collaboration between other federal agencies, universities, research agencies, etc… and the Census Bureau. Individuals from federal agencies, research agencies, and universities that will be using the external SharePoint sites will go through an approval process before they can be granted access to a specific portion of the extranet SharePoint site. They are authorized using CEN01 CPASS and will login via a username and password.

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

Authorized and authenticated Census employees can retrieve information by identifiers such as name and email address.

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

Information is transmitted securely via Hypertext Transfer Protocol Secure (HTTPS) and Transport Layer Security (TLS).
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. Continue chart below, continue to answer questions, and complete certification.

   Changes That Create New Privacy Risks (CTCNPR)


   ___ 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). Continue to answer questions and complete certification.

   ___ 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). Skip questions and complete certification.

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

   NIST Special Publication 800-53 Revision 4, Appendix J, states “Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary.” Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

   ___ Yes. (Check all that apply.)

   |Activities| |
   |Audio recordings| Building entry readers|
   |Video surveillance| Electronic purchase transactions|
   |Other (specify):| |

   _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.).”

____ Yes, the IT system collects, maintains, or disseminates BII.

_X_ No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate PII?

As per OMB 17-12: “The term PII refers to information that can be used to distinguish or trace an individual’s identity either alone or when combined with other information that is linked or linkable to a specific individual.”

_X_ Yes, the IT system collects, maintains, or disseminates PII about: (Check all that apply.)

_X_ DOC employees
__ National Institute of Standards and Technology Associates
_X_ Contractors working on behalf of DOC
_X_ Other Federal Government personnel
_X_ 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 Social Security numbers (SSNs), including truncated form?

___ Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

_X_ No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

_X_ 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.

4d. 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.

_X_ 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, 4c, and/or 4d 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 CEN26 Sharepoint 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 [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of Information System Security Officer (ISSO) or System Owner (SO): James Keith

Signature of ISSO or SO: JAMES KEITH  [Digital signature]  Date: 2020.08.03 13:52:40 -04'00"

Name of Chief Information Security Officer (CISO): Beau Houser

Signature of CISO: BEAU HOUSER  [Digital signature]  Date: 2020.08.05 23:28:00 -04'00"

Name of Privacy Act Officer (PAO): Byron Crenshaw

Signature of PAO: BYRON CRENSHAW  [Digital signature]  Date: 2020.08.20 10:31:54 -04'00"

Name of Technical Authorizing Official (TAO): Kevin Smith

Signature of AO: KEVIN SMITH  [Digital signature]  Date: 2020.08.06 12:38:46 -04'00"

Name of Business Authorizing Official (TAO): Gregg Bailey

Signature of BAO: GREGG BAILEY  [Digital signature]  Date: 2020.08.06 14:13:43 -04'00"

Name of Bureau Chief Privacy Officer (BCPO): Byron Crenshaw

Signature of BCPO: BYRON CRENSHAW  [Digital signature]  Date: 2020.08.20 10:32:18 -04'00"