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

**Privacy Threshold Analysis
for the
Associate Director for Decennial Census Program (ADDCP)
Decennial**

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau ADDCP Decennial

Unique Project Identifier: 006-000400400

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 on 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: *Provide a brief description of the information system.*

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).

> Decennial is a collection of applications, technologies, and supporting infrastructure established to support the Decennial Census Programs' mission. Applications support hiring and management efforts, data collection and processing, data management and reporting, content security and Census close out activities.

Address the following elements:

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

Decennial manages the development and implementation of decennial census applications and systems utilized by the Decennial Census Program to produce statistics and consists of applications and systems that collect, maintain and process, and/or disseminate data collected from decennial census respondents and decennial census personnel. These applications and systems process response data from census tests and Decennial Census operations and/or perform quality assurance mechanisms for various census operations.

Applications and systems that collect, maintain, process, and/or disseminate PII include:

Control and Response Data System (CaRDS) - CaRDS provides sample design and Universe determination for the Decennial Census.

Decennial Response Processing System (DRPS) - DRPS provides Auto-coding, Clerical coding, Data editing and imputation for the Decennial post data collection response processing.

Additionally, it creates Decennial Response Format (DRF), Census Unedited File (CUF) and Census Edited File (CEF) files.

Decennial Budget Integration Tool (DBiT) – DBiT is used by the Decennial Budget Office (DBO) to perform ongoing cost estimation, budgeting, budget planning, and budget execution management functions required to prepare and execute the Census and beyond, including the Census enterprise.

Disclosure Avoidance System (DAS) – DAS applies privacy controls to microdata in the data flow from the Census Edited File (CEF) to the Microdata Detail File (MDF). The privacy controls assure that there is no direct mapping between individual records in the CEF to individual records in the MDF.

Infrastructure Services –includes hardware and software used to manage and support Decennial applications and systems.

Network Infrastructure – includes hardware and software used to manage the connectivity and communication across Decennial applications and systems.

SAS Foundation – SAS Foundation provides Sampling Criteria, Contact Strategies and Sample for re-interviews, manages the Experiments Program, and verifies the Sample Design File (SDF).

Post-Enumeration Survey (PES) – PES includes the Processing and Control System (PCS) which performs automatic matching, workload control and sampling for Coverage Measurement, Imputation and Estimation System which performs the imputation and estimation for Coverage Measurement, and Clerical Match and Map Update (CMMU) which performs clerical matching activities and map spot updates for Coverage Measurement. The Coverage Measurement program provides estimates of net coverage error and components of census coverage for housing units and people in housing units.

Recruiting and Assessment (R&A) – R&A is an externally managed systems that provides capabilities for applicant recruiting, learning management system (LMS) and the applicant pre-selection assessment process for temporary hires.

b) System Location

CaRDS, DRPS, DBiT, DAS, Infrastructure Services, Network Services, SAS Foundation, and PES are hosted and managed within the Bowie Computer Center (BCC) located in Bowie, Maryland and/or AWS GovCloud (US-East) and AWS GovCloud (US-West) Regions located in the Eastern and Northwestern parts of the United States. R&A - Unified Talent Management Suite (CUTMS) Cloud located in data centers within the United States.

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

CaRDS, DRPS, DBiT, DAS, Network Services, SAS Foundation, PES, and R&A interconnects internally with systems within the Census Bureau which include OCIO Field Systems Major Application Systems, ADDCP Geospatial Services; ADEP Demographic Surveys; Application Development and Support Division (ADSD)'s Commerce Business System (CBS), Consolidated Budgeting and Reporting Application system (COBRA) within the OCFO Budget systems, Census Data Lake (CDL) within the OCIO Enterprise Applications systems; ADRM Center for Enterprise Dissemination Services and Consumer Innovation (CEDSCI); Decennial Applicant, Personnel and Payroll Systems (DAPPS) with the OCIO Human Resources applications; ADDCP American Community Survey systems; and ADEP Economic Programs.

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

Decennial's primary purpose is to support systems and applications used in surveys and census to collect data for statistical purposes.

Decennial also has applications/technologies used to support Decennial surveys and operations, which includes personnel management services for the Census enterprise.

e) *The way the system operates to achieve the purpose*

CaRDS, DRPS, DAS, Infrastructure Services, Network Services, SAS Foundation, and PES support the collection, monitoring, and processing response data from census tests and the ongoing Census operations and perform quality assurance mechanisms for various census operations. Data collection is used to produce statistics.

DBIT – Manages and tracks budget requests.

R&A - R&A is an externally managed systems that provides capabilities for applicant recruiting, learning management system (LMS) and the applicant pre-selection assessment process for temporary hires.

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

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Additionally, it creates Decennial Response Format (DRF), Census Unedited File (CUF) and Census Edited File (CEF) files.

Decennial Budget Integration Tool (DBiT) – DBiT is used by the Decennial Budget Office (DBO) to perform ongoing cost estimation, budgeting, budget planning, and budget execution management functions required to prepare and execute, including the Census enterprise.

Disclosure Avoidance System (DAS) – DAS applies privacy controls to microdata in the data flow from the Census Edited File (CEF) to the Microdata Detail File (MDF). The privacy controls assure that there is no direct mapping between individual records in the CEF to individual records in the MDF.

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Recruiting and Assessment (R&A) – R&A is an externally managed systems that provides capabilities for applicant recruiting, learning management system (LMS) and the applicant pre-selection assessment process for temporary hires.

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

Select U.S Census Bureau government employees and contractors sworn in as having a need to know.

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

Information in Decennial applications and systems are retrieved by using PII information identified that pertains to authorized users using internal web applications, secure databases, and managed file transfer servers.

Information contained within the applications and systems are not available to the public.

Only authorized Census Bureau federal employees and contractors with a need-to-know have access to the applications. These authorized users' interface with the information contained within the applications and systems using authorized internal web applications, file servers, and/or databases that are protected with a multi-layer security approach. This approach includes the deployment of internal technologies to safeguard data and ensure privacy as well as mandatory training for all system users. All Census Bureau employees and contractors undergo mandatory annual data stewardship training to include proper handling, dissemination, and disposal of BII/PII/Title 13/Title 26 data.

i)   How information is transmitted to and from the system

Information is transmitted to and from CaRDS, DRPS, DAS, Infrastructure Services, Network Services, SAS Foundation, PES, and R&A using either the Census Bureau Enterprise Service Bus (ESB) via the service-oriented architecture (SOA) suite, application program interfaces (API) and/or secure point-to-point connections. Files are encrypted and transferred using the service-oriented architecture (SOA) via the ESB. The ESB is a configuration based, policy-driven enterprise service bus. It provides highly scalable and reliable service-oriented integration, service management, and traditional message brokering across heterogeneous IT environments. It combines intelligent message brokering with routing and transformation of messages, along with service monitoring and administration in a unified software product.

DBIT receives direct feeds and input from OCIO CBS, COBRA within the OCFO Budget Applications, and the user community. Communications is performed and secured to and from the system via the TLS 1.2 standard.

Questionnaire:

1. Status of the Information System
1a. 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. *Skip questions and complete certification.*

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

____ Yes. This is a new information system.

____ Yes. This is an existing information system for which an amended contract is needed.

____ No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.

__X__ No. This is not a new information system.

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
   __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?

__X__ 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.
R&A - Temporary hires looking to support the Census submit their job applications through the R&A system. Temporary hire social security numbers collected as part of the employment application process per OPM. Census respondent social security numbers are not collected. No other applications or systems within Decennial collect the public's social security numbers.

Provide the legal authority which permits the collection of SSNs, including truncated form.
5 U.S.C. 301, 44 U.S.C. 3101, and 3309, 5 U.S.C. 7531-3325 U.S.C., 5379, 5 CFR Part 5375 U.S.C. 1302, 2951, 3301, 3372, 4118, and 83475 U.S.C. 1104, 3321, 4305, and 54055 U.S.C. 3321, 4303, 7504, 7514, and 75435 U.S.C. 3109, 3302, 3304, 3305, 3307, 3313, 3317, 3318, 3319, 3326, 4103, and 5533

____ 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 SAOP approved PIA must be a part of the IT system's Assessment and Authorization Package.

CERTIFICATION

__X___ The criteria implied by one or more of the questions above **apply** to Decennial and as a consequence of this applicability, a PIA will be performed and documented for this IT system.

_____ 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.

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Privacy Act Officer Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: _____ Date signed: _____	**Authorizing Official** Name: Luis J. Cano Office: Office of the Chief Information Officer Phone: (301) 763-3968 Email: luis.j.cano@census.gov Signature: _____ Date signed: _____
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