

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



Privacy Threshold Analysis
for the
Associate Director for Economic Programs (ADEP) International
Trade Program (ITP)

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/ ADEP International Trade Program (ITP)

Unique Project Identifier: 006-000400700

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:

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 description of the International Trade statistics and databases is provided below:

The ADEP International Trade Division Applications IT system collects, maintains, and processes International Trade statistics to produce a press release called the U.S. International Trade in Goods and Services (FT900). The IT system also includes information about importers and exporters that are maintained in databases.

The International Trade Statistics collected, processed and released as the FT900 are a principal economic indicator providing a complete count of American import and export transactions, based on official documents that shippers and receivers must file with the Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP). The data provide measures of the competitiveness and strength of domestic manufacturers and help measure the market for various goods; and allow computation of apparent consumption. They are essential for: Economic policymaking; providing information used in the National Accounts; providing data essential for monitoring trade agreements and for measuring the impact of imports on the U.S. economy; providing data used for Civil and Criminal Enforcement activities.

The Importer Database provides both government and private sector users with information about the importing community including employment size, type of company, and major foreign markets. The Exporter Database provides both government and private sector users with information about the exporting community including employment size, type of company, and major foreign markets. The

information is obtained from the FT900 and the Business Register (BR) and maintained in the Importer and Exporter Databases.

USA Trade Online (UTO) is an interactive online database for U.S. international trade data. It is the key dissemination tool for U.S. export and import statistics using the Harmonized System (HS) and North American Industry Classification System (NAICS) commodity classification system. This powerful tool allows users to create customized reports for port-level detail, state exports/imports, balance of trade, market level ranking, etc. Government agencies, businesses, and the academic community use this system at all times to advance their mission.

Address the following elements:

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

The ADEP International Trade Division consists of major applications.

b) *System location*

The ADEP International Trade Division applications are located at the Census Headquarters.

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

IT systems covered by the ADEP International Trade Division connect with the Automated Commercial Environment (ACE), which is managed and supported by the Department of Homeland Security Customs and Border Protection (DHS/CBP). Connections are also to internal Census Bureau IT systems covered by the Associate Director for Demographic Programs (ADRM) Center for Enterprise Dissemination (CED), Office of the Chief Information Officer (OCIO) Telecommunications Office (TCO) Data Communications systems, & Associate Director for Economic Programs (ADEP) Economic Census and Surveys and Special Processing systems. Interconnections are also made with IT systems of the Canadian Exchange.

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

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e) The way the system operates to achieve the purpose

FT900:

The electronic collection method for imports is the Automated Commercial Environment (ACE), which is managed and supported by the DHS/CBP.

Additional gas and electric import data are provided electronically to the Census Bureau's Economic Applications Division (EAD) via the Canadian Data Exchange (in coordination with Statistics Canada) and to the International Trade Zones (FTZ). Each time import data is processed (five times for each statistical month), Canada receives micro data from the Census Bureau consisting of trade data detailed records showing imports from Canada to the US. Data includes Harmonized System (HS) code, district, port, method of transportation, foreign port, quantity, shipping weight, entry month, importer, etc. For each record, there are a total of 86 fields that are sent.

The Census Bureau's Economic Management Division (EMD) has an office in Puerto Rico that processes import data keyed from paper documents via the Puerto Rico Data Capture System (PRDCS). Import documents are delivered to the Puerto Rico site via U.S. mail from each of the ports maintained by the DHS/CBP. The documents are secured in a locked file cabinet when not in use and eventually shredded.

The data collection mechanism for reporting exports is the ACE. ACE data transmissions occur daily. The information collected by the ACE is referred to as Electronic Export Information (EEI).

The Canadian Data Exchange also provides electronic data to the Census Bureau on U.S. exports to Canada which is maintained by this IT system.

Importer and Exporter Databases:

Information used is matched with edited import and export data acquired from the ACE during the FT900 Press Release process; the Census Bureau's Business Register data, which contains Federal Tax Information (FTI); and Economic Census and Survey data.

USA Trade Online (UTO):

The following describes the UTO Update process. During the FT-900 Press Release closeout phase all ASCII files for the UTO data load and SQL cube creation are provided. The data provision process results in placing the UTO data on a server on Press Release day at 8:30AM. Upon completion, EAD programming staff verify that the UTO website is updated with the most recent statistical data.

The UTO is a web application that provides subscription users with U.S. trade data. It has two major components. One is the user authentication account management application, and the other provides users with a graphic user interface for searching the U.S. trade database and generating reports.

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

Data on U.S. exports of merchandise from the U.S. to all countries, except Canada, is compiled from the Electronic Export Information (EEI) filed by the USPPi or their agents through the Automated Commercial Environment (ACE).

The EEI is unique among Census Bureau data collection methods since it is not sent to respondents soliciting responses as in the case of surveys. Each EEI represents a shipment of one or more kinds of merchandise from one exporter to one foreign importer on a single carrier. Filing the EEI is mandatory under Chapter 9, Title 13, United States Code. Qualified exporters or their agents submit EEI data by automated means directly to the U.S. Census Bureau.

Published data on U.S. imports of merchandise is compiled primarily from automated data submitted through the U.S. Customs' Automated Commercial Environment (ACE). Data are also compiled from import entry summary forms, warehouse withdrawal forms and International Trade Zone documents as required by law to be filed with the U.S. Customs and Border Protection. Data on imports of electricity and natural gas from Canada are obtained from Canadian sources.

The import and export data may contain Personal Identifiable Information (PII) such as (name, address, telephone number, email address, Employer Identification Number (EIN), Data Universal Numbering System Number (DUNS) and border crossing number or passport number). The Business Identifiable Information (BII) may contain (characteristics of companies that

export and import, details of a shipment(s) and its transportation into or out of the United States, between the United States and Puerto Rico, or between the United States and the U.S. Virgin Islands and Canada).

General public users subscribe to the UTO application by providing information; such as email address, country, locality, organization type, and phone number. This is the only information collected by the UTO application and it is not disseminated.

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

Census staff and special sworn contractors deemed as having a right to know have access to the system information. For USA Trade Online, in addition to the previously mentioned persons, the public also have access.

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

The FT900 component monthly produces the U.S. International Trade in Goods and Services press release. Regarding the Importer and Exporter Databases components, during September/October of each year, final extracts are created for the current year and compiled into a final Report. General public users subscribe to the UTO application by providing information; such as email address, city, country, locality, postal code, organization type, phone number and information required for selecting Security questions. Once the subscription is completed, users can access U.S. trade data to generate customized reports.

i) How information is transmitted to and from the system

For the FT900, please see the discussion above in section (e). For the Importer and Exporter Databases components files are transmitted via Secure File Transfer Protocol (SFTP) from ADEP International Trade Division servers to a ADRM Center for Enterprise Dissemination's (CED) server. General public users access UTO through a secured URL (https) using a browser.

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	
b. Anonymous to Non-Anonymous		e. New Public Access	
c. Significant System Management Changes		f. Commercial Sources	
g. New Interagency Uses			
h. Internal Flow or Collection			
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):	

☒ 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.

☐ 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."

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

- ☒ DOC employees
- ☒ Contractors working on behalf of DOC
- ☐ Other Federal Government personnel
- ☒ 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.

☒ 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?

☒ 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.

☒ 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 the Associate Director for Economic Programs (ADEP) International Trade Division Applications 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 Associate Director for Economic Programs (ADEP) International Trade Division Applications and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Information Systems Security Officer Name: Prentis L. Cumbo Office: Economic Applications Division (EAD) Phone: (301) 763-5010 Email: prentis.l.cumbo@census.gov Signature: _____ Date signed: _____	Chief Information Security Officer Name: Beau Houser Office: Office of Information Security (OIS) Phone: 301-763-1235 Email: beau.houser@census.gov Signature: _____ Date signed: _____
Privacy Act Officer Name: Byron Crenshaw Office: Policy Coordination Office (PCO) 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 (OCIO) Phone: (301) 763-3968 Email: luis.j.cano@census.gov Signature: _____ Date signed: _____
Bureau Chief Privacy Officer Name: Byron Crenshaw Office: Policy Coordination Office (PCO) Phone: 301-763-7997 Email: byron.crenshaw@census.gov Signature: _____ Date signed: _____	