

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



Privacy Threshold Analysis
for the
Associate Director for Economic Programs (ADEP) Economic
Census and Surveys and Special Processing

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/ Associate Director for Economic Programs (ADEP) Economic Census and Surveys and Special Processing ADEP EAD System Authorization Boundaries

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: *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).

The Census Bureau’s Economic Programs Directorate is responsible for statistical programs that measure and profile U.S. businesses and government organizations. This includes conducting an Economic Census and a Census of Governments every five years; over 100 separate surveys taken monthly, quarterly, annually, or periodically, including principal economic indicators; voluminous export and import statistics produced monthly; extensive compilations of administrative records; and numerous research and technical studies.

The Directorate conducts a number of surveys under reimbursable agreements with other Federal agencies such as the Bureau of Justice Statistics, the National Center for Education Statistics, the Bureau of Transportation Statistics, the Federal Reserve Board, the National Science Foundation, the Environmental Protection Agency, the Agency for Healthcare Research and Quality, the Department of Energy, and the Departments of Housing and Urban Development.

Address the following elements:

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

ADEP Economic Census and Surveys and Special Processing consists of major applications, Business Register (BR), Standard Economic Processing System (StEPS), Micro Analytical Database (MADb), eCorrespondence and minor general support systems to support Economic statistics and survey collection.

b) System location

All applications reside on servers located in Headquarter's Computer Center or within a secured cloud (Public or Government) environment located in Eastern and Northwestern parts of 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)

The systems within ADEP Economic Census and Surveys and Special Processing interconnect with systems internal and external to Census and are as follows:

- Office of the Chief Information Officer (OCIO) Data communications
- OCIO Centurion
- OCIO Field
- Internal Revenue Service (IRS)
- Social Security Administration (SSA)

d) The purpose that the system is designed to serve

The purpose of the Economic Census and Surveys and Special Processing are:

- statistical purposes
- administrative matters
- customer satisfaction
- and to improve federal services online

e) The way the system operates to achieve the purpose

The Economic Directorate utilizes the IT system for statistical purposes:

The U.S. Census Bureau Economic Programming Directorate is responsible for statistical programs that measure and profile businesses and government organizations in the United

States. ECON activities are wide reaching and include: (1) conducting an Economic Census and a Census of Governments every five years; (2) conducting over 100 current surveys taken monthly, quarterly, and annually, including twelve principle economic indicators for the U.S economy; (3) the compilation of administrative records from other government agencies; and (4) facilitating numerous research and technical studies.

The IT system has various applications. The applications are designed to accommodate numerous surveys with differing requirements and support all aspects of survey processing. Integrated modules that perform administrative functions allow users to modify the application to meet survey requirements. The surveys process both Title 13 and Title 26 data excluding the construction monthly surveys, which are project based. These applications provide data entry, editing, imputation, data review and correction, estimation, and variance estimation. Also, the Census Bureau's master list of businesses called the Business Register (BR). The primary mission of the BR is to provide a complete, unduplicated universe of statistical units that can be used to construct business survey sampling frames and provide a basis for Economic Census enumeration.

The survey information contained in the Business Register, which is used as the mailing list for the Economic Census and the primary sampling frame for virtually all other business surveys, is collected to track the movement of commodities from Businesses throughout the United States. As such, the names, addresses, and other identifying characteristic data are vital to the mission of the Economic Directorate.

Economic surveys that handle Personally Identifiable Information (PII)/Business Identifiable Information (BII) and interact with the Business Register (BR) are used for statistical purposes and understand the state of the U.S. economy.

Surveys that track industry trends examine how these trends have changed health insurance coverage over time. The data is used for national benchmarking estimates on how Americans use and pay for their health care services. This collection includes information from household respondents about their health conditions, use of medical services, and their health insurance coverage. The following is also collected: supplemental information from doctors, hospitals, and home health agencies and is linked to the household survey; information about nursing home residents and nursing home facilities; and information from employers who provide health insurance to their employees and periodically includes a subset linked to the household survey.

Economic indicator surveys measure activity in the services sector of the economy. Indicator series track current economic activity, and are closely followed and widely used by policy makers in the public and private sectors. PII/BII is in reference to the business establishment selected for the survey (mailing forms and contacting the respondent) and is only collected

for the purpose of conducting the survey and generating aggregate statistics. No PII/BII is disseminated at the respondent level, nor is it shared with other agencies.

Quarterly surveys on the rates of capacity utilization for the U.S. manufacturing and publishing sectors is collected for statistics on establishment operational status, value of actual production, estimated production attainable at full and emergency conditions, and reasons for operating at less than full production capacity. The survey also collects data on work patterns by shift. These data include days per week in operation, plant hours per week in operation, and weeks in operation in the quarter. The Federal Reserve Board benchmarks this data for monthly estimates of capacity output and utilization to analyze the change in use of capital, capital stocks and inputs related to capacity growth. The Department of Defense uses the data to assess readiness to meet demand for goods under selected national emergency scenarios.

Annual surveys help to measure U.S. current economic performance. Using a sample of about 70,000 service firms, this survey collects revenue; expenses; e-commerce sales; and for some industries, exports, inventories, class of customer, and detail product lines based on the North American Product Classification System (NAPCS). Data is disseminated only at an aggregate level and suppressed if it could lead a user to reasonably deduct the source. The government uses the data to determine economic policy. Private industry relies on this data for planning and research.

Surveys pertaining to the Business Owner Program, contains all survey responses, sampling data, and administrative records and responses are loaded from the National Processing Center (NPC), Business Register, and other administrative sources. This survey system also performs batch and interactive editing, produces estimates, and performs related survey processing.

Construction owners and builder respondent's complete economic surveys regarding the construction and sales status of homes sampled and data for two principal economic indicators are produced: New Residential Construction (housing starts and housing completions) and New Residential Sales. In addition, a number of other statistical series are produced, including extensive information on the physical characteristics of new residential buildings, and indexes measuring rates of inflation in the price of new buildings.

Builders, owners, bookkeepers or contract specialists are contacted to complete surveys regarding the construction expenditures of construction projects sampled and data for the Value of Construction Put in Place principal economic indicator are produced from this survey. In addition, a number of other statistical series are produced, including information on the length of time of construction, the average cost per unit of new residential units and geographic breakdown of the private nonresidential construction.

Manufacturing survey data tracks the movement of commodities from Businesses throughout the United States and provides broad-based monthly statistical data on current economic conditions and indications of future production commitments in the manufacturing sector. This data collected from a panel of approximately 4,500 reporting units, is not selected based on a probability sample. Units may be divisions of diversified large manufacturing companies, large homogenous manufacturing companies, or single-unit manufacturers. Data describe activities taking place during the calendar month. There are 66 industry categories collected to estimate total durable goods and 23 industry categories to estimate nondurable goods. Data is collected electronically via OCIO Centurion internet reporting Computer Assisted Telephone Interview (CATI) (within the OCIO Field Division) for data reporting by phone, or in person interviews for some business owner surveys. Data Uses: (1)

Bureau of Economic Analysis: Uses the Advance Report in making GDP estimates and compiling the principal economic indicator series. (2) Federal Reserve Board and Council of Economic Advisers: Use the Advance Report for developing fiscal and monetary policy. (3) The Conference Board: Uses data from the Advance Report as two components of the index of leading economic indicators.

In addition to existing survey inquiries, inquiries added between 2017-2020 Economic Census and Report of Organization questionnaires provide estimations of royalty and license fees for use of intellectual property, contract manufacturing services purchased and provided, operating revenues, and net sales data. A large portion of the described Economic survey data is processed within two Economic Standard Economic Processing Systems StEPS and StEPS II that are customized on a survey-by-survey basis in order to meet the specific needs and requirements for each survey. Post-collection processes such as editing, imputation, data review and correction, data query, estimation, analysis tools, disclosure, and variance estimation support functions for collection technologies that include mail-out, check-in, data capture, and follow-up.

The Census Bureau uses a secure data transfer system that does not connect directly with external systems, however, is an automated system that provides one way transfer to Census from partner agencies to support administrative data collection. Census Bureau core programs receiving data via the secure data transfer systems must have approved agreements in place.

The Economic Directorate utilizes the IT system for administrative matters:

The Economic Directorate survey areas uses BII to create mailing lists of registered businesses and supplies mail outs to authorized business respondents that receive authorization codes to submit responses for economic-related surveys housed in OCIO Centurion, which is accessed via the eCorrespondence portal. The eCorrespondence portal

collects only enough data to confirm the identity of the individual and create an account for self-service, survey support, and survey collection functionality.

The Economic Directorate utilizes the IT system to improve Federal services online:

Both the Economic and Communications Directorate use eCorrespondence's Pega CRM to improve Federal services online. This sub-component of the eCorrespondence portal web application performs several survey-related transactions that improve customer support interaction with the Census Bureau. For the OCIO Data Communications, eCorrespondence CRM provides the Census Bureau the capability to capture, route, track and respond to every visitor-initiated query that comes through the Census.gov channels. eCorrespondence CRM also provides business partners and respondents direct support for assistance with registration or logging in to access OCIO Centurion survey data collection system through single sign-on, requests for time extensions for completing surveys, delegating a survey to another authorized individual, assistance with specific survey responses via secure messaging, a Frequently Asked Questions (FAQ) database and subscription service for real-time notifications for new FAQ updates and information. Designated Census Bureau Support representatives for eCorrespondence/Pega CRM view submitted customer cases and respond via secure messaging to provide direct, interactive support.

The Economic Directorate utilizes the IT system for customer satisfaction and online services:

For eCorrespondence, there are two main transaction types in the eCorrespondence system. The first is a respondent self-help transaction. A business respondent logs in and authenticates via a component in the OCIO Data Communications security boundary to access the eCorrespondence web application and performs one or more survey-related transactions. This includes requesting delegation of a survey to another individual or accessing the OCIO Centurion survey data collection system through single sign-on, etc.

The second type of transaction is a support request. These transactions are managed by the Pega CRM tool. A business respondent can request direct support for a specific survey via secure messaging. Similarly, an anonymous user can submit a message for general support (e.g., for help registering or logging into the website). Support representatives view the submitted secure messages as cases and respond to customers providing interactive support. Only internal Census Bureau staff with a need-to-know may access or view these records.

The goal of the eCorrespondence project is to deliver a platform for both incoming and outgoing interactions with customers that can be reused across the Census Bureau by all directorates. Internally, eCorrespondence Pega will allow Census Helpdesk support staff to receive customer inquiries organized into cases and provide resolutions while performing outbound communication based on customer preferences and business rules. PII/BII is collected to support user account management for survey related transactions. Additionally,

the system is also used to document data dissemination activities and to capture interactions with data users. It is also used to track all Census Bureau partnership activities and activities between the Census Bureau and outside organizations.

The Census Bureau will also use machine learning, web scraping/crawling, and artificial intelligence to improve the quality of data without increasing respondent burden. Machine learning is a type of artificial intelligence (AI) used to improve a model's ability to predict over time without changing the model itself. Web scraping/crawling will collect publicly available in a much more efficient way than manually searching the web. Web scraping refers to extracting data from the internet in an automated way. Web crawling refers to the process of automatically browsing the internet - going from site to site, link to link. The Automated Internet Data Collection Review Board (AIDCRB), and possibly the Disclosure Avoidance Review Board (DRB) must approve these technologies before using.

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

Information (whether personally identifiable information (PII) or business identifiable information (BII)) collected by this IT system are personal names, personal addresses, personal contact information (telephone numbers, email address), business information, occupation, tax information, account information etc. The information is retrieved by PII/BII by Census Bureau staff who have a business need to know. Only Census Bureau employees and their agents with Special Sworn Status can access data under Title 13 U.S.C. Title 13, U.S.C. Section 23 (c) permits the Census Bureau to provide Special Sworn Status to individuals who must access Census Bureau data to assist the Census Bureau in carrying out the work of its title

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

Census Bureau Employees and Contractors have access to the information. For some surveys, the public will have access to their own PII/BII.

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

Information (whether personally identifiable information (PII) or business identifiable information (BII)) collected by this IT system are personal names, personal addresses, personal contact information (telephone numbers, email address), business information, occupation, tax information, account information, etc. The information is retrieved by PII/BII by Census Bureau staff who have a business need to know. Only Census Bureau employees and their agents with Special Sworn Status can access data under Title 13 U.S.C. Title 13, U.S.C. Section 23 (c) permits the Census Bureau to provide Special Sworn Status to individuals who must access

Census Bureau data to assist the Census Bureau in carrying out the work of its title.

i) How information is transmitted to and from the system

Data is transferred through secure data transfer systems. Encryption is implemented for data in transit using SSL/HTTPS to ensure secure transmission of data. Web services utilize encrypted security tokens during transmission of data to prevent data access outside of an authenticated and valid session and is also implemented for data at rest in the databases. For the secure transfer systems, no PII/BII is collected, maintained, or disseminated by the systems. These systems are strictly used for the transfer of data. Additional information on the collection, maintenance and dissemination of PII/BII is included in the individual approved data sharing agreements that the secure transfer systems support.

The secure transfer systems also work in hand with survey data processed via StEPS I/II for seamless secure transfer of survey files.

eCorrespondence utilizes unique, one-time use Authentication Codes mailed to respondents for each survey in which the respondent participates.

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 | X |
| c. Significant System Management Changes | | f. Commercial Sources | | i. Alteration in Character of Data | |
| j. Other changes that create new privacy risks (specify): Use of the cloud | | | | | |

- ☐ 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.*

- ☐ 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.

 X Yes. *(Check all that apply.)*

| Activities | | | |
|---|--|----------------------------------|--|
| Audio recordings | | Building entry readers | |
| Video surveillance | | Electronic purchase transactions | |
| Other (specify): Web Scraping/Crawling, Artificial Intelligence, and machine learning | | | |

_____ No.

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

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

_____ 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) Economic Census and Surveys and Special Processing 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) Economic Census and Surveys and Special Processing and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

| | |
|---|--|
| Information System Security Officer Name: Philomina Mbah Office: Office of Information Security Phone: 301-763-1748 Email: philomina.i.mbah@census.gov Signature: _____ Date signed: _____ | Chief Information Security Officer Name: Beau Houser Office: Office of Information Security Phone: 301-763-1235 Email: beau.houser@census.gov Signature: _____ Date signed: _____ |
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