

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



Privacy Threshold Analysis
for the
Office of the Chief Information Officer (OCIO) Centurion

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau OCIO Applications Development and Services Division (ADSD) Centurion

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: *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).

OCIO ADSD Centurion (Centurion going forth) is a web-based application used for the design, delivery, and execution of surveys, censuses, and other data collection and data exchange efforts over the Internet.

Centurion allows the Census Bureau to collect data in a cost effective way with a higher degree of accuracy as compared to equivalent traditional data collection methods. Information collected via the Centurion IT system includes data covered by both Title 13 and Title 26 collection authorities for demographic and economic surveys. Standard web browser clients are used to access the Centurion IT system.

Members of the public accessing Centurion are survey or census respondents. Information collected via Centurion includes, but is not limited to names, telephone numbers, email addresses, etc.

Address the following elements:

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

Centurion is a major application.

b) *System location*

Centurion is located at the Bowie Computer Center.

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

Centurion interconnects with internal Census Bureau IT systems to leverage enterprise services (OCIO Data Communications and Network Services) and inherit security controls provided by the Enterprise Common Control Providers (ECCP). Centurion also interconnects with the following internal Census Bureau systems: Associate Director for Economic Programs (ADEP) Economic Census and Surveys and Special Processing, Associate Director for Field Operations (ADFO) Field, Geography, OCIO Enterprise Applications, Associate Director for Decennial Census Program (ADDCP), American Community Survey, and ADEP Innovation Technology Office (ITO). In addition, Centurion connects with an external system at the Bureau of Industry and Security (BIS).

d) The purpose that the system is designed to serve

The purpose of Centurion is for statistical purpose and to improve federal online services

e) The way the system operates to achieve the purpose

Centurion is a web-based application used for the design, delivery, and execution of surveys, censuses, and other data collection and data exchange efforts over the Internet. Centurion allows the Census Bureau to collect data in a cost effective way and with a higher degree of accuracy as compared to equivalent traditional data collection methods.

Standard web browser clients are used to access the Centurion IT system. Members of the public accessing Centurion are survey or census respondents; they authenticate to the IT system, enter response data through a series of interactive web forms, and submit survey responses.

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

Information collected via the Centurion IT system includes data covered by both Title 13 and Title 26 collection authorities for demographic and economic surveys. Information collected via Centurion includes, but is not limited to, names, telephone numbers, email addresses, etc.

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

Information within Centurion is limited to a handful of authorized Special Sworn Status, Census Bureau employees and contractors, and administrative users. Survey respondents also have access to their information only.

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

Information in Centurion is retrievable by a personal identifier such as name and by authorized Centurion administrators.

i) How information is transmitted to and from the system

Information collected from survey respondents is provided back to the survey sponsors through Secure File Transfer Protocol (SFTP). Users submit survey information via applications using secure protocols such as HTTPS.

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.)."

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."

X 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.
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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 Centurion 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 SharePoint and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

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<p>Privacy Act Officer Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>	<p>Authorizing Official Name: Luis J. Cano Office: Office of the Chief Information Officer Phone: (301) 763-3968 Email: luis.j.cano@census.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>
<p>Bureau Chief Privacy Officer Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>	Empty space for signature and date