

**U.S. Department of Commerce  
National Institute of Standards and Technology  
(NIST)**



**Privacy Threshold Analysis  
for the  
450-01 Baldrige Performance Excellence Program System (BPEP)**

## U.S. Department of Commerce Privacy Threshold Analysis

### National Institute of Standards and Technology (NIST)

**Unique Project Identifier: 450-01**

**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 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).

- a) Whether it is a general support system, major application, or other type of system*
- b) System location*
- c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
- d) The purpose that the system is designed to serve*
- e) The way the system operates to achieve the purpose*
- f) A general description of the type of information collected, maintained, use, or disseminated by the system*
- g) Identify individuals who have access to information on the system*
- h) How information in the system is retrieved by the user*
- i) How information is transmitted to and from the system*

**The Baldrige Performance Excellence Program (BPEP) oversees the nation's only Presidential award for performance excellence while offering a wide array of award-winning products and services, including the world-renowned Baldrige Excellence Framework. The function/purpose of the system is to support the electronic needs and activities of the internal and external customers in support of this mission.**

**Components of this system include the Baldrige Online Scorebook Solution (BRIDGE), Baldrige Examiner Applicant (BEA), and the Baldrige Secure On-line Ordering Application. American Society for Quality (ASQ) provides contractual support for the Malcolm Baldrige National Quality Award (MBNQA) Award Cycle.**

*a. Whether it is a general support system, major application, or other type of system*  
**450-01 is a general support system.**

*b. System location*

**The system is located at the NIST Gaithersburg, Maryland facility within the continental United States.**

**The 450-01 Baldrige Performance Excellence Program System (BPEP) is physically located in the NIST Gaithersburg, Maryland facility (NIST System 184-12).**

**The ASQ component resides in a datacenter in Milwaukee, Wisconsin within the continental 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 450-01 Baldrige Performance Excellence Program System (BPEP) is a standalone system. Authorized users enter and retrieve data directly from the components in the system.**

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

**The purpose of 450-01 is for administrative matters. Specifically, the function/purpose of the system is to support the electronic needs and activities of the Baldrige Performance Excellence Program for internal and external customers. These activities include providing structured database access for NIST staff within NIST Infrastructure environment to information relevant to the processes related to the Baldrige team activities. Shared files and print services are available to staff members.**

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

**450-01 External Social Media and Services (LLL)**

**Social Networking Services (L/L/L)** \*\*See “450-01 Baldrige Social Media Policies and Procedures”

- **GovDelivery:** as part of the NIST contract and governed under SSP 107-02, Baldrige is using GovDelivery to host a blog, BLOGRIGE, on WordPress (with whom they have subcontracted). Baldrige also uses GovDelivery to manage their email lists and as their email delivery provider. There are links from our website to sign-up for emails from the Baldrige Program, as well as a link to Baldrige blog.
- **Facebook:** Baldrige maintains pages under NIST’s 107-02 Facebook site.
- **YouTube:** Baldrige maintains playlist under NIST’s 107-02 channel on YouTube, where they provide Quest for Excellence, Ceremony, Examiner, and general Program videos and video clips.
- **Flickr:** Baldrige manages photos under NIST’s 107-02 Flickr site.

- **Twitter:** Baldrige staff tweet Baldrige and industry-related news and blog posts. Baldrige maintains several accounts that they use to communicate updates on the conference and to try and engage in conversation in this space. See “Baldrige Twitter Accounts” for details on the Twitter accounts.
- **LinkedIn:** Baldrige has a number of LinkedIn Groups as a way to build their online communities, exchange information, and hear from their existing and potential customers. See “450-01\_NIST\_Baldrige\_LinkedIn\_Page\_Procedures\_and\_Security\_Settings.docx”.

#### 450-01 Web Applications (M/M/L)

- **Baldrige.nist.gov (L/L/L):** Baldrige staff members also provide input for the baldrige.nist.gov public website (SSP 184-12). This is a static information delivery site maintained by the OISM, and designated Baldrige staff have the rights to post and manage.
- **Baldrige Examiner Applicant (BEA) website (M/M/L):** This site allows potential Baldrige examiners (external users) to complete an online application. It also includes an internal portion that is used to administer the site and review the applications.
- **BRIDGE Application (M/M/L):** A secure web application hosted on WebPS with the server and OS completely maintained by the OISM staff under SSP 184-12 and allows examiners to create and manage a review of one applicant through the award process. Judges gain access to prepare for their recommendation meeting. The Baldrige Primary System Administrator and designated members of the Baldrige Staff have administrative privileges within the application.
- **The BPEP Internal Application (MML):** is an internal application that allows Baldrige staff to see the status of the award process. This application contains the following:
  - Training Registration
  - Examiner Selection
  - Various Reports for Award Process

The application is a .NET web-based application running on supported hardware by OISM. The application was built in house using secure web application guidelines.

- **Baldrige SRD Secure On-line Ordering Application (MML):** The application to access the BPEP Online Ordering System provides external users with the ability to purchase Baldrige Performance Excellence Criteria online in a secure manner. Baldrige Excellence Criteria is still part of the SRD E-Commerce System, but this application provides a secure protected view for BPEP staff.

**Users purchase products by entering required contact information (i.e., name and address), billing information (i.e., credit card information), and then submit their order through the system.**

**450-01 ASQ Subsystem (M/M/L)**

**American Society for Quality (ASQ) is an outsourced, offsite subsystem that provides services in support of the Baldrige Performance Excellence Program. Tasks include BPEP process management support, typesetting, printing, and distribution of program documents, Award Cycle Evaluation Stages (including receipt of eligibility and Award applications, Examiner assignments, scorebook checks (BRIDGE), Judges' meetings notebook preparation, site visit logistics). All functions performed for NIST are carried out internally within ASQ, meaning they do not maintain an external application that provides services to NIST.**

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

**The system collects award applications, applications for individuals to be examiners, review information about award applications, and information needed to process orders for Baldrige materials.**

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

**Baldrige employees and contractors, as well as individuals who have been selected to be Examiners and Judges, have role-based access to information in the system.**

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

**Users must authenticate to each system component. Access to information is restricted based on the user's role.**

*i. How information is transmitted to and from the system*

- **BRIDGE** is a public-facing web application that allows examiners and judges to create and manage review of applicants throughout the award process.
- **BEA** is a public-facing web application that allows potential Baldrige examiners (external users) to complete an online application. It also includes an internal portion that is used to administer the site and review the examiners.
- **The Secure On-line Ordering Application** provides external users with the ability to purchase Baldrige Performance Excellence Program Criteria online in a secure manner, with a secure protected view for BPEP staff.
- **The ASQ component** provides management support, typesetting, printing, and distribution of program documents, Award Cycle Evaluation Stages (including receipt of eligibility and Award applications, Examiner assignments, scorebook checks, Judges' meetings notebook preparation, and site visit logistics).

**Questionnaire:**

1. Status of the Information System

1a. What is the status of this information system?

**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.)**

Changes That Create New Privacy Risks (CTCNPR)
Other changes that create new privacy risks:

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

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.

Activities
Other activities which may raise privacy concerns:

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.).”

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate sensitive personally identifiable information (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.”

The IT system collects, maintains, or disseminates sensitive PII about:

*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?

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.

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

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.

*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.*

Is a PIA Required?	Yes
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## CERTIFICATION

X The criteria implied by one or more of the questions above **apply** to the 450-01 Baldrige Performance Excellence Program System (BPEP) 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 450-01 Baldrige Performance Excellence Program System (BPEP) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

<p><b>Information System Security Officer or System Owner</b></p> <p>Name: Ambrosi, Ronald Office: 101/A0615 Phone: 301-975-2715 Email: Jamie.amprosi@nist.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>	<p><b>Chief Information Security Officer</b></p> <p>Name: Heiserman, Blair Office: 225/A155 Phone: 301-975-3667 Email: nist-itso@nist.gov</p> <p>_____</p> <p>Signature: _____</p> <p>Date signed: _____</p>
<p><b>Co-Authorizing Official</b></p> <p>Name: Fangmeyer, Robert Office: 101/A0638 Phone: 301-975-4781 Email: robert.fangmeyer@nist.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>	<p><b>Authorizing Official</b></p> <p>Name: Sastry, Chandan Office: 225/B222 Phone: 301-975-6500 Email: chandan.sastry@nist.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>
<p><b>Privacy Act Officer</b></p> <p>Name: Fletcher, Catherine Office: 101/A523 Phone: 301-975-4054 Email: catherine.fletcher@nist.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>	<p><b>Chief Privacy Officer</b></p> <p>Name: Barrett, Claire Office: 225/B226 Phone: 301-975-2852 Email: claire.barrett@nist.gov</p> <p>Signature: _____</p> <p>Date signed: _____</p>

