U.S. Department of Commerce
National Oceanic & Atmospheric Administration

Privacy Threshold Analysis for the

NOAA/OCIO/Information Technology Center (ITC)
NOAA1101

U.S. Department of Commerce Privacy Threshold Analysis

NOAA/OCIO/Information Technology Center (ITC)

Unique Project Identifier: NOAA1101

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 General Support System (ITC) 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).

NOAA1101 is General Support System (GSS) and consists of an interconnected set of information resources under the management and control of Service Delivery Division (SDD) within the NOAA Office of the Chief Information Officer (OCIO). NOAA1101 provides Infrastructure as a Service (IaaS), Platform as a Service (PaaS) and Application Support Services.

NOAA1101 hosts Two (2) Major Applications, Commerce Business System (CBS) and Grants Online (GOL) along with a number of minor applications and legacy databases for applications that are no longer in use. Some of these applications also consist of a number of modules and interfaces. NOAA1101 manages a combination of Physical and Virtual servers running:

- Solaris
- Red Hat
- Windows
- ESXi VMWare
- Citrix XenApp
- Oracle and SQL Databases

NOAA1101 hosts Major and Minor Applications and stores data at the following locations:

- EDC-Ashburn Facility, (VA)
- West Virginia High Tech Consortium (WVHTC)
- Amazon Web Service (AWS)

Major Applications:
Commerce Business System (CBS)
CBS consists of the Core Financial System (CFS) interfaced with standard Commerce-wide administrative systems for procurement (C.Award), relocation (MLinqs - Permanent Change of Station (PCS) moves), labor cost distribution, NOAA data warehouse (NDW), and SAM /ABA (SAM /CCR).

CBS supports the NOAA integrated financial management system for NOAA and cross-serviced bureaus, EDA and Bureau of Industry and Security (BIS). No other DOC organizations obtain their Accounting Services from NOAA or have applications under this system.

CBS supports the financial functions required to track financial events, provide financial information important for the financial management of Commerce and its operating units, and required for the preparation of financial statements, and to allow Commerce to continue receiving clean financial audit opinions. NOAA CBS financial systems modules support: CFS, NOAA Permanent Change of Station (PCS – Mlinqs / Relocation Manager), and other reporting activities (NOAA Data Warehouse) that are unique to NOAA.

This is a non-public system.
Access to this application is through the NOAA1101 General Support Systems (GSS) environment, which is limited to authorized NOAA, BIS, and EDA staff.

Grants Online (GOL)
The Commerce Grants Online System provides grants management automation in support of grant application evaluation, award, and long-term management and operations processes. Specifically, Grants Online is a business workflow system that provides a standardized set of automated processes for viewing, retrieving, modifying, and deleting grants information including, applications, awards, amendments, audits, proposed scoring and commentary, progress and financial reports, as well as technical and panel peer review information.

The Grants Online system electronically retrieves grant applications from Grants.gov for processing in the Grants Online system. It also interfaces with CBS, the Department's financial system of record. The system was designed to be scalable in an effort to accommodate future change and enhancements as the grants management processes and policy change. NOAA typically awards approximately $1 billion in grants annually.

<u>Minor Applications</u>
Listed below are the minor applications that store Personally Identifiable Information (PII) or Business Identifiable Information (BII).

Archibus
Archibus is a facilities management software solution available in both Web-based and Microsoft Window-based platforms. The system, integrated with CAD design software, is currently used by Facilities Operations Division (FOD) to manage space planning and personnel, equipment, on demand and preventive maintenance work at the National Capital Region (NCR) in Silver Spring, MD, Western Regional Center (WRC) in Seattle, WA, and Inouye Regional Center (IRC) in Honolulu, Hi.

Common Access Card (CAC)
The Common Access Card web application assists CAO with processing CAC cards for NOAA's federal employees.

Deep Water Horizon – LaserFiche (DWH)
The LaserFiche electronic records management system (ERMS) is the application used by the NOAA Damage Assessment Restoration and Remediation Program (DARRP) to manage federal records.

This system is not used to intentionally collect or store PII/BII. It is used by the DARRP to store and maintain substantive federal records related to natural resource damages assessment matters, as well as other (non-personnel related) program management aspects of the DARRP. There is a possibility that

some records entered into the system may incidentally contain PII/BII, but this is unusual and not the purpose of the system.

Foreign National Registration System (FNRS)
FNRS was designed to provide sponsors (NOAA researchers) of Foreign National Guests (who conduct collaborative research, participate in field research activities, and perform other duties while guests of NOAA), controlled technology coordinators, and the Office of Security, a single location to enter the information required to obtain appropriate approvals for a visit. We collect FNRS information solely to meet the requirements set forth by NOAA and DOC policies and regulations to sponsor a Foreign National Guest. Name, home email address, age, gender, race/ethnicity, date of birth, place of birth and passport number are collected. Sponsors do not share this information.

Management Analysis and Reporting System (MARS)
The Management Analysis and Reporting System (MARS) is a NOAA initiative to provide a reporting and querying facility and a commitment tracking facility that is common to all NOAA Line Offices. The Reporting and Querying Module is based on NWS' Business Objects Web Intelligence implementation and the Data Entry module is based on Oracle Application Server.

NOAA Reporting System (NRS)
The NOAA Reporting System is a windows application (web services) that transmits Common Access Card information from the Defense Enrollment Eligibility Enrollment System (DEERS) to NOAA and stores the information in an Oracle database for reporting purposes.

NOAA Staff Directory (NSD)
The NOAA Staff Directory is a contact lookup and management system for NOAA. It allows the public to look up basic contact information. It also allows internal users to access detailed contact information as well as add/remove relationships and users from the main NOAA directory.

Operations Planning and Control System (OPCS)
OPCS is the EDA grant information, proposal processing and project tracking system. *The grant request forms are downloaded from Grants.gov.* The grant applications are reviewed to determine eligibility. Once the grant applicant is considered eligible, some of the information from the grant applications is entered in the OPCS application. This application consists of five (5) modules which are OPCS, Security, CBS Import, Federal Funding Accountability and Transparency Act (FFATA) and Congressional District Zip Codes. The OPCS module provides the capability to track the grant project from pre-application through approval to project closeout. OPCS combines proposal tracking documentation with a variety of other information about proposals, applications and approved projects, the areas in which they are located, and the proposed and actual impacts of such projects. The following are description of the supporting modules that are associated with OPCS:

SECURITY - System Security module grants appropriate access rights to groups of users and individual users based on login and password.

CBS Import – This module imports data from the NOAA CBS system. Files are manually exported from CBS and the module imports the required data for the OPCS database. The data that are tracked in OPCS are reservation, obligation, and disbursement.

FFATA **-** This module provides the capability to extract certain information from the OPCS database, allows the user to review the data for quality assurance, and provides the data in the format needed to meet the guidance provided by the Office of Management and Budget (OMB) for data submission to the USA Spending web site under the Federal Financial Accountability and Transparency Act (FFATA).

Congressional District Zip Codes - This module provides the capability to upload the congressional district data.

PII and BII are mainly data at rest. The PII and BII data are accessed only by EDA authorized users and not shared outside the programs.

Address the following elements:

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

   NOAA1101 is a General Support System.

b) *System location*
   - EDC-Ashburn Facility Ashburn, VA
   - West Virginia High Tech Consortium (WVHTC) Fairmont, WV
   - Amazon Web Service (AWS)-US East/West

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

   NOAA1101 has interconnections with the following NOAA systems:
   - NOAA0201 – Web Operation Center
   - NOAA0550 – NOAA Enterprise Network
   - NOAA4000 – Fisheries WAN Enterprise Services
   - NOAA4000 – Seafood Inspection System Portal (SISP)
   - NOAA4000 – Trident (OLE)
   - NOAA4000 – (NMFS) - Trident
   - NOAA5006 – NESDIS Administrative Local Area Network (NESDIS Admin LAN)
   - NOAA8223 – Consolidated Logistics Systems (CLS)
   - NOAA8850 – NWS Enterprise Mission Enabling System
   - NOAA8884 – NWS Southern Region Fort Worth

   NOAA1101 General Support System (GSS) has interconnections with Non-NOAA systems to support the missions of applications we host. The data is pushed and or pulled using an encrypted connection and is stored on a database where it is accessed by the applications using a secured connection using HTML, SFTP or SSH. All connections require the use of a VPN connection. We have interconnections with the following Non-NOAA systems:

   Interconnections limited to CBS Accessibility:
   - DOC C-Suites
   - DOC CWT Sato Travel

- DOC Security Manager
- DOC SmartPay 3
- DOC (Sunflower, FACTS, C.Award)
- HCHB Net
- NIST Commerce Business System, Core Financial System (CBS/CFS)
- Treasury Department – Fiscal Service – ESC
- Treasury Department – Fiscal Service – TWAI
- USDA NFC

Interconnections limited to GOL accessibility:
- Grants.gov

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

NOAA1101 is an interconnected set of information resources under the management and control of Service Delivery Division (SDD) within the NOAA Office of the Chief Information Officer (OCIO).

NOAA1101 provides Infrastructure as a Service (IaaS), Platform as a Service (PaaS) and Application Support Services. These services are instrumental to obtaining the objectives of the President's Management Agenda; achieving the goals of the Office of Management and Budget for effective and efficient Government; and NOAA's goal for excellence in the technical operational support of NOAA's financial, management, and administrative systems. Support activities of the General Support System include direct, technical, and operational support of financial and administrative systems.

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

The system operates in the traditional client server model. Data is hosted on servers and made available via various protocols such as HTTPS, SFTP, and SSH. Users need to VPN into the system.

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

NOAA1101 collects, stores, and disseminates some types of personnel information, but reasonable accommodations (RAs) are not collected.

Archibus: Information regarding both federal employees and contractors stationed at NOAA campuses in Silver Spring, MD (Silver Spring Metro Center) and Honolulu, Hawaii is collected via the NOAA Personnel Certification application where personnel access their individual record using CAC authorization or Google authentication. Information regarding both federal employees and contractors stationed at Seattle, is collected manually and manually entered in the system. Employee location data is used to generate floor accountability rosters for emergency preparedness.

Commerce Business Systems (CBS): The CBS information is used to support the administrative and financial management requirements of NOAA, including, but not limited to, making payments to employees and vendors (members of the public). The PII identified is for federal employees and Vendors / Contractors. BII is required for companies providing services to NOAA for payment processing via the U.S. Department of Treasury.

Common Access Card (CAC/NRS): NOAA collects PII data from DEERS and it is used to process applications for CACs for federal employees. Non PII portion of CAC data is used to determine who has a CAC and expiration data and statistical reporting.

Deep Water Horizon – LaserFiche: Federal records that are placed into the system may incidentally

contain PII/BII; however, as noted above the collection and storage of PII/BII is not the purpose of the system. Records will be entered into the system by DARRP personnel when the individual custodian of the record deems that it is important enough to be retained for long term storage.

Foreign Nationals Registration System (FNRS): The information collected in FNRS is used to obtain appropriate approvals for a foreign national visit. The information is collected from members of the public.

Grants Online (GOL): Information is collected from applications that are downloaded from grants.gov and that have been mailed to agencies. The mailed applications are manually entered into the grants online. Look-up data feed is from SAM.gov.

Management Analysis and Reporting System (MARS): Data is extracted from the NOAA Data Warehouse (NDW), National Finance Center (NFC) files (HR), and other sources. MARS information is used to support the administrative and financial management requirements of NOAA. The PII identified is for federal employees. BII is required for companies providing services to NOAA.

NOAA Staff Directory (NSD): Personal Phone Number and Email is collected for the Emergency Notification System (ENS) through the NSD web application.

OPCS (EDA): The PII and BII for OPCS is collected by the Grants.gov system. The forms are downloaded from Grants.gov. The required data are manually entered into OPCS by EDA users. Only the eligible grant applicant information is entered into OPCS. Information collected is from agencies or members of the State, Local, Tribal, and Universities.

g) *Identify individuals who have access to information on the system*
Only NOAA federal employees and contractors and other federal agencies with a valid operational need has access to the information system.

h) *How information in the system is retrieved by the user*
Information hosted in NOAA1101 is retrieved by the Major and Minor applications via various protocols such as HTTPS, SFTP, and SSH. Users need to VPN into the system.

i) *How information is transmitted to and from the system*
Information is transmitted to and from the NOAA1101 using an encrypted connection such as HTTPS, SFTP, and SSH. Users need to VPN into the system.

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.*

__X__   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): As a designated enterprise platform as a service (ePaaS) provider for NOAA, the confidentiality, integrity and availability of four new data types applicable to the ITC above has been raised to a High Impact level which supports the criticality of customer data and applications to be hosted within the NOAA1101 System Boundary and the ITC System Specific Enclave. The new data types are: Continuity of Operations, IT Infrastructure Maintenance, Information System Security, and System and Network Monitoring. This change in information types does not apply to the CBS, GOLs or other applications currently hosted within the ITC boundary. In addition ITC as the GSS does not collect, process, store or transmit BII/PII information. Each major/minor application is responsible for the ensuring the protection of all BII/PII within their applications.					

_____   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.

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

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	X
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.)*
      _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.

CAC: To process and provide the CAC.

CBS/GOL: Financial account information and grant/loan applications require Tax ID Numbers. These could be either SSNs or EINs. In some cases, in NOAA1101, the Tax ID is an SSN.

MARS: Uses SSN# to identify employees.

Provide the legal authority which permits the collection of SSNs, including truncated form.

FFATA; Federal Managers' Financial Integrity Act of 1982; Federal Financial Assistance Management Improvement Act of 1999; 16 USC 6109(a)(4), 3402; 8 USC 1324a; 41 CFR 60-4.3, E.O. 11246

5 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 5379; and Executive Order 9397, as amended by 13478, 9830, and 12107

COMMERCE/DEPT-18, Employee Personnel Files Not Covered by Notices of Other Agencies.

____   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.
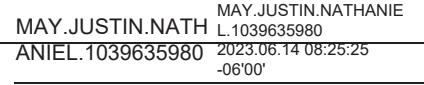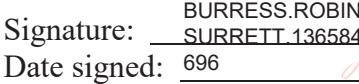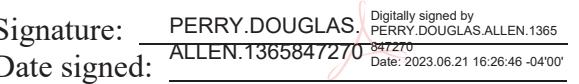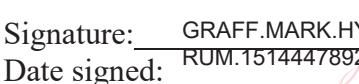
  X   No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

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 the NOAA1101 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 NOAA1101 and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Information System Owner	**Information Technology Security Officer**
Name: Stefan Leeb Office: Phone: 240-429-0619 Email: stefan.leeb@noaa.gov Signature: _____ Date signed: _____ LEEB.STEFAN.ANTON.1158781260 2023.06.14 10:29:22 -04'00'	Name: Justin May Office: Phone: 240-499-6792 Email: Justin.may@noaa.gov Signature: _____ Date signed: _____ MAY.JUSTIN.NATHANIEL.1039635980 2023.06.14 08:25:25 -06'00'
Privacy Act Officer Name: Robin Burress Office: NOAA OCIO Phone: 828-271-4695 Email: Robin.Burress@noaa.gov Signature: _____ Date signed: 696 BURRESS.ROBIN.SURRETT.1365847696 Digitally signed by BURRESS.ROBIN.SURRETT.1365047696 Date: 2023.06.22 10:10:23 -04'00'	**Authorizing Official** Name: Doug Perry Office: Phone: Email: douglas.a.perry@noaa.gov Signature: _____ Date signed: _____ PERRY.DOUGLAS.ALLEN.1365847270 Digitally signed by PERRY.DOUGLAS.ALLEN.1365847270 Date: 2023.06.21 16:26:46 -04'00'
Bureau Chief Privacy Officer Name: Mark Graff Office: NOAA OCIO Phone: 301-628-5658 Email: Mark.Graff@noaa.gov Signature: _____ Date signed: _____ GRAFF.MARK.HYRUM.1514447892 Digitally signed by GRAFF.MARK.HYRUM.1514447892 Date: 2023.06.21 16:46:59 -04'00'	**Co-Authorizing Official** Name: Cameron Shelton Office: NOAA OCIO Phone: 301-628-5721 Email: Cameron.shelton@noaa.gov Signature: _____ SHELTON.CAMERON.LYLE.13658433 13 Digitally signed by SHELTON.CAMERON.LYLE.1365843313 Date: 2023.06.21 13:55:03 -04'00' Date signed: _____