

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



**Privacy Threshold Analysis
for the
OCFO Budget Division Applications**

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/OCFO Budget Division Applications

Unique Project Identifier: 006-000403600

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 on 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 Office of the Chief Financial Officer (OCFO) Budget Division within the U.S Census Bureau manages, formulates, and executes the annual budget allocated by the U.S. Congress. Stakeholders, internal and external to the Budget Division (BUD), rely on financial reports generated from budget data. OCFO Budget Division applications create directorate and division-level project cost estimates (based on salary and non-salary costs) and provides prebuilt reports and dashboards for reporting usage.

Address the following elements:

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

OCFO Budget Division Applications consists of two major applications known as Consolidated Budget and Reporting Application (COBRA) and Financial Investments Analysis Tool (FIAT).

b) System location

The system resides at the Census Bowie Computer Center and is internal to the Census network without public access.

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

OCFO Budget Division Applications interconnects with Office of the Chief Information Officer (OCIO) Commerce Business System (CBS), Associate Director for Decennial Census Programs

(ADDCP) Decennial Budget Integration Tool (DBiT), OCIO Network Services for server and infrastructure purposes, and receives user authentication information from the OCIO Data Communications.

d) The purpose that the system is designed to serve

Regarding COBRA, information about employees is needed to ensure a complete and comprehensive assessment of salary costs is captured. In addition, employee information is needed to ensure all necessary positions, staff, and vacancies are accounted for and funded. Employee-level salary information is combined to support the budget formulation and budget execution process described in OMB Circular A-11.

The purpose of FIAT is to deliver an Integrated Financial Reporting solution to enhance analytical reporting capabilities, including, but not limited to: Developing an integrated reporting infrastructure, building reporting dashboards, enabling ad hoc and management reporting, integrating multiple identified data sources, and supporting a new Integrated Financial Reporting platform.

e) The way the system operates to achieve the purpose

COBRA is the Census Bureau's budgetary system of record to support budget execution and budget formulation as described in OMB Circular A-11. The only Personally Identifiable Information (PII) stored in COBRA is data about U.S. Census Bureau employees. Census Bureau administrative offices create directorate and division-level project cost estimates, from the ground up, based on salary costs and non-salary costs. To build the salary costs, the administrative offices map which employees work on each project and the proportion of time they will spend on each project during a fiscal year to create a position listing (PL). The position listing is updated using personnel data from the OCIO Commerce Business System (CBS) and merged with project data from the previous operating plan or Budget Planning Documents (BPDs). This module contains PII including employee name, job series, grade, and per annum salary, however, there are no Social Security Numbers collected.

FIAT is a SAS Business Intelligence/Oracle Data Warehousing solution. FIAT provides users with a variety of prebuilt static and dynamic reports and dashboards. Dashboards enable users to monitor Key Performance Indicators that convey how things are performing at any point of time. OLAP (Online analytical processing) cubes can be viewed as a pre-summarized multidimensional format data to improve query processing.

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

The only Personally Identifiable Information (PII) stored in COBRA is data about U.S. Census

Bureau employees. OCFO Budget Division Applications contains PII including employee name, job series, grade, and per annum salary, however, there are no Social Security Numbers collected.

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

U.S. Census Bureau employees and contractors have access to the information within OCFO Budget Division Applications.

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

COBRA: COBRA Users and administrators (Census Bureau employees and contractors) can retrieve information by personal identifiers such as name and employee ID.

FIAT: FIAT administrators (Census Bureau employees) with a work related need-to-know can retrieve information by personal identifiers. Users of FIAT (Census Bureau Employees) cannot retrieve information by personal identifiers.

i) How information is transmitted to and from the system

COBRA and FIAT are accessed within the Census internal network and data is securely transferred to other internal systems via encrypted Oracle Database Connectivity (ODBC) links.

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.)."

- 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

The criteria implied by one or more of the questions above **apply** to the OCFO Budget 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 [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

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