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

Privacy Threshold Analysis
for the
Office of the Chief Information Officer (OCIO)
Applications Development and Services Division (ADSD)
Field Systems

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau OCIO ADSD Field Systems

Unique Project Identifier: 006-000401400

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 Field Systems is a major information system whose purpose is to support the Census Bureau Field Directorate's mission in collecting data on behalf of both internal and external sponsors for sample surveys, special censuses, the Economic Census, and the Decennial Census. The OCIO Field IT systems collect Personally Identifiable Information (PII) from respondents for these surveys and censuses such as name, address, contact information, race, gender, education, date of birth, and financial information. In addition, Field Representative characteristics are also collected while surveys and census interviews are conducted.

Address the following elements:

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

The OCIO ADSD Field Systems Major Application System is a set of information systems managed by the Application Development Services Division (ADSD) in support of the Census Bureau Field Directorate.

b) System location

The IT system is housed at the Census Bureau's Bowie, MD computer center. There are also components hosted in the Amazon Web Services (AWS) cloud, located in the Northeastern part 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)

OCIO Field exchanges data with the following Census internal IT systems: Associate Director for Economic Programs (ADEP) Economic Census and Surveys and Special Processing, Office of the Chief Information Officer (OCIO) Commerce Business Systems (CBS), Associate Director for Field Operations (ADFO) National Processing Center (NPC), Associate Director for Demographic Programs (ADDP) Demographic Census, Surveys, and Special Processing, Associate Director for Demographic Programs (ADRM) Center for Enterprise Dissemination (CED), Associate Director for Economic Programs (ADEP) EAD Windows Applications System, and Associate Director for Economic Programs (ADEP) Innovation and Technology Office (ITO) Integrated Computer Assisted Data Entry (iCADE), Census Image Retrieval Application (CIRA), and MOJO Enhanced Operational Control System. In addition, desktop and laptop client services are provided by Office of the Chief Information Officer (OCIO) Client Support Division (CSD) Client Services; server support is provided by Office of the Chief Information Officer (OCIO) Computer Services Division (CSvD) Network Services; 19c database support is provided by Office of the Chief Information Officer (OCIO) Enterprise Applications, and; Decennial support is provided by Associate Director for Demographic Programs (ADDCP) Decennial. Property data is also sent to DOC Sunflower.

d) The purpose that the system is designed to serve

The Field Directorate plans, organizes, coordinates, and carries out the Census Bureau's field data collection program for sample surveys, special censuses, the Economic Census, and the Decennial census. The OCIO Field IT system maintains Personally Identifiable Information (PII) collected from respondents for these surveys and censuses such as name, address, contact information, race, gender, education, financial information, etc. In addition, Field Representative characteristics are also collected while surveys and census interviews are conducted.

e) The way the system operates to achieve the purpose

The Field Directorate plans, organizes, coordinates, and carries out the Census Bureau's field data collection program for sample surveys, special censuses, the Economic Census, and the Decennial census. The OCIO Field IT system maintains Personally Identifiable Information (PII) collected from respondents for these surveys and censuses such as name, address, contact information, race, gender, education, financial information, etc. In addition, Field Representative characteristics are also collected while surveys and census interviews are conducted.

Laptops are used to collect survey data in the field. An application assigns cases and monitors interviewing progress. Information systems covered by other directorate level authorization boundaries are used as routing mechanisms to transfer survey data from various survey sources, that includes but are not limited to, computer interviewing, telephone interviewing utilizing Census Bureau computer programs, internet self surveys, and paper surveys to the survey sponsors.

Operational Control System (OCS) is another OCIO Field tool and will serve as the standard tool to assign, control, track, and manage listing, survey and census workloads for the field workforce. OCS provides an enterprise application framework for this need, regardless of the interviewer-assisted mode used (phone or in person).

Another tool in OCIO Field is the Survey Field Identification Tool (sFIT). The purpose of sFIT is to aid in investigating situations where it is suspected that a Field Representative (FR) may be falsifying respondent information. The tool will be used by Contact Center and Regional Office (RO) employees to identify FR who are suspected of falsification and to facilitate and document the results of the investigations. The tool replaced the previous automated system and the paper 11-163 forms. sFIT collects and disseminates PII regarding a survey respondent and the Field Representative who is suspected of falsifying survey data.

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

The OCIO Field IT system maintains Personally Identifiable Information (PII) collected from respondents for these surveys and censuses such as name, address, contact information, race, gender, education, financial information, etc. In addition, Field Representative characteristics are also collected while surveys and census interviews are conducted.

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

U.S. Census Bureau employees and contractors have access to the system.

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

There are many external sponsors, but OCIO Field does not have direct connections to any of them. Demographics Survey Division (DSD), the Economics Directorate, etc., will give OCIO Field the surveys that they have crafted for the external sponsors and the data collected for those surveys is placed into the OCIO Field Master Control System (MCS) for the internal system to pick up. It will be the other internal sponsors' responsibility to vet the information, transform it into a format that the external sponsors can ingest and send it off. The sharing of the data should be on those systems with the external connection to the external sponsors. Individual or

household records containing PII are retrieved by any number of personal identifiers collected including name, address, contact information, etc.

i) How information is transmitted to and from the system

Data collected is transmitted to the OCIO Field IT secure data warehouse called the Unified Tacking System (UTS). The UTS data warehouse provides the user a view of cost and progress data over time, across surveys, and from different data capture sources at one time. This means all the data is in one place for the user to view, analyze, and make more efficient and effective decisions. The data in the UTS is not editable but the reports produced are easily customizable. UTS extracts and provides a view of survey data over time, data collection modes, and data collection operations. It aggregates data and creates canned reports. These reports are made available to stakeholders, approved individuals, and organizations to support optimization and coordination of decennial, current, and special surveys. The reports are developed by a special staff that was established through the Office of the Director to serve as an analytic team with specific, ongoing responsibilities to develop analytic tools (charts and tables). These tools will be used by decennial and current survey field managers toward the goal of continuous improvement in survey operational efficiency. This group will both initiate and respond to issues related to survey performance indicators including cost, data quality, and data collection progress. This database interfaces with systems throughout the Census Bureau that contain PII, Business Identifiable Information (BII), and data collected and/or protected under Title 13 and Title 26.

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.

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

Activities			
Audio recordings	x	Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

____ 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
____ 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. 1) Employee's full SSN info needed for cost reimbursement and other financial purposes. 2) The last 4 digits of the survey respondent's SSN helps is collected on behalf of the survey sponsor, The National Center for Health Statistics (NCHS). The justification for the necessity of collecting this information, taken from the latest approved Office of Management and Budget (OMB) Information Collection Request (ICR) supporting statement is below: Social Security Number and Health Insurance Claim Number: The last four digits of the Social Security Number (SSN) is asked on the NHIS questionnaire to allow linkage with administrative and vital records, such as the National Death Index (NDI). The NDI is a computerized central file of death record information. It is compiled from data obtained by NCHS from the State vital statistics offices. The data contain a standard set of identifying information on decedents from 1979 to the present. Records are matched using Social Security Number and other variables such as name, father's surname, date of birth, sex, state of residence, and marital status. Of these, Social Security Number is the most important identifier for successful matching. The last four digits has been shown to be nearly as effective for matching as the full number. The Social Security Number is also used by the Medical Expenditure Panel Study to help track the location of respondents who have changed residence since their NHIS interview. Finding a correct address for respondents is essential to maintaining response levels at an acceptable level in linked surveys, and the Social Security Number is a key item for establishing a correct address. Medicare beneficiaries are given a health insurance claim (HIC) number that is their (or their spouse's) SSN with an alphabetic prefix. The NHIS also asks for the last four digits of that number so that the NHIS data can be linked to Medicare claims information for purposes of statistical research.
Provide the legal authority which permits the collection of SSNs, including truncated form. The legal authority for the NHIS is through CIPSEA: Congress authorized the NHIS data collection in Section 306 of the Public Health Service Act (42 United States Code [U.S.C.] 242k)

____ 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 OCIO Field 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 OCIO Field and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Information System Security Officer Name: Stephen B. Suddeth Office: Office of Information Security Phone: 301-763-1593 Email: stephen.b.suddeth@census.gov Signature: STEPHEN SUDDETH Digitally signed by STEPHEN SUDDETH Date: 2023.05.22 12:10:34 -04'00' Date signed:	**Chief Information Security Officer** Name: Beau Houser Office: Office of Information Security Phone: 301-763-1235 Email: beau.houser@census.gov Signature: BEAU HOUSER Digitally signed by BEAU HOUSER Date: 2023.05.24 15:25:08 -04'00' Date signed:
Privacy Act Officer Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: BYRON CRENSHAW Digitally signed by BYRON CRENSHAW Date: 2023.05.25 14:56:27 -04'00' Date signed:	**Agency Authorizing Official** Name: Luis J. Cano Office: Office of the Chief Information Officer Phone: (301) 763-3968 Email: luis.j.cano@census.gov Signature: LUIS CANO Digitally signed by LUIS CANO Date: 2023.05.24 15:31:58 -04'00' Date signed:
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