

U.S. Department of Commerce

Office of the Secretary (OS)



Privacy Impact Assessment for the System B General Support System (GSS)

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Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
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Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Date

U.S. Department of Commerce Privacy Impact Assessment National Security Solution and Services (NS3) System B GSS

Unique Project Identifier: System B GSS

Introduction: System Description

Provide a description of the system that addresses the following elements:

The response must be written in plain language and be as comprehensive as necessary to describe the system.

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

The System B is a General Support System (GSS).

(b) System location

System B GSS is located at the Department of Commerce (DOC) Herbert C. Hoover Building (HCHB) in Washington DC.

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

System B is a GSS that provides support to System E, which is a major application used by the DOC Office of the Secretary (OS), Investigations and Threat Management Service (ITMS) to manage, store, and track ITMS investigative matters. ITMS investigative matters include both general criminal and national security interest information and are classified up to and including Top Secret.

(d) The way the system operates to achieve the purpose(s) identified in Section 4

Connectivity between the room is provided by armored 62.5 MM fiber optic cabling and is terminated on NSA approved KG-175D TACLANE encryption devices. All IT equipment is owned and operated by the National Security Solutions and Services (NS3). The data processed within the System B GSS environment is transmitted via the TACLANE encrypted devices to protect the data from being read and or intercepted while in transit.

(e) How information in the system is retrieved by the user

System B GSS users log into the network using two factor authentications: UserID and password. Electronic access via individual-specific logon credentials will retrieve cases assigned to the user logged in. Searches may be performed by search criteria that include case numbers, date range, priority level, category, status organizations, and other key word search variations.

(f) How information is transmitted to and from the system

The data processed within the System B GSS environment is transmitted via the TACLANE encrypted devices to protect the data from being read and or intercepted while in transit.

(g) Any information sharing conducted by the system

System B GSS utilizes INTELINK for information sharing with other agencies.

(h) The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information

15 U.S.C. 1501 et. seq.; 28 U.S.C. 533-535; 44 U.S.C. 3101 (Records Management); 5 U.S.C. 301 (Departmental Regulations); 5 U.S.C. 7311 (Suitability, Security, and Conduct); 5 U.S.C. 7531-33 (Adverse Actions, Suspension and Removal, and Effect on Other Statutes); 18 U.S.C. (Crimes and Criminal Procedures); Executive Order 10450 (Security Requirements for Government Employment); Executive Order 13526 and its predecessor orders (Classified National Security Information); Executive Order 12968 (Access to Classified Information); HSPD-12, 8/27/04 (Homeland Security Presidential Directive); Executive Order 13356, 8/27/04 (Strengthening the Sharing of Terrorism Information to Protect Americans); Executive Order 13587 (Structural Reforms to Improve the Security of Classified Networks and the Responsible Sharing and Safeguarding of Classified Information); Public Law 108-458 (Intelligence Reform and Terrorism Prevention Act of 2004); Intelligence Authorization Act for FY 2010, Public Law 111-259; Title 50 U.S.C. 402a, Coordination of Counterintelligence Activities; Executive Order 12829 (National Industrial Security Program); Committee for National Security System Directive 505 (Supply Chain Risk Management); Presidential Memorandum National Insider Threat Policy and Minimum Standards for Executive Branch Insider Threat Program.

(i) The Federal Information Processing Standards (FIPS) 199 security impact category for the system

The System B GSS has been categorized as a High impact level system.

Section 1: Status of the Information System

1.1 Indicate whether the information system is a new or existing system.

- This is a new information system.
- This is an existing information system with changes that create new privacy risks.
(Check all that apply.)

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.
- 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 01-2015).
- 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).

Section 2: Information in the System

2.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. (Check all that apply.)

Identifying Numbers (IN)					
a. Social Security*	X	f. Driver's License	X	j. Financial Account	X
b. Taxpayer ID	X	g. Passport	X	k. Financial Transaction	X
c. Employer ID	X	h. Alien Registration	X	l. Vehicle Identifier	X
d. Employee ID	X	i. Credit Card	X	m. Medical Record	
e. File/Case ID	X				
n. Other identifying numbers (specify): CAC or building access card numbers; visa numbers; license and permit numbers; criminal history and arrest records; FBI numbers; IP addresses					
*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	X	h. Date of Birth	X	o. Financial Information	X
b. Maiden Name	X	i. Place of Birth	X	p. Medical Information	X
c. Alias	X	j. Home Address	X	q. Military Service	X
d. Gender	X	k. Telephone Number	X	r. Criminal Record	X
e. Age	X	l. Email Address	X	s. Physical Characteristics	X
f. Race/Ethnicity	X	m. Education	X	t. Mother's Maiden Name	X
g. Citizenship	X	n. Religion	X		
u. Other general personal data (specify): affiliations; travel history; records related to drug and alcohol use; names of spouses, relatives, references, affiliations, and personal associates; activities; internet data and items posted to social networking sites					

Work-Related Data (WRD)					
a. Occupation	X	e. Work Email Address	X	i. Business Associates	
b. Job Title	X	f. Salary	X	j. Proprietary or Business Information	
c. Work Address	X	g. Work History	X		
d. Work Telephone Number	X	h. Employment Performance Ratings or other Performance Information			
k. Other work-related data (specify): all employment history; human resource and personnel data; financial disclosure; special access program requests; facility and computer access logs; clearance adjudication and investigation data; security and suitability materials; incidents involving unauthorized access to classified information; reports of policy, physical, information, or cyber security violations or infractions					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints	X	d. Photographs	X	g. DNA Profiles	X
b. Palm Prints	X	e. Scars, Marks, Tattoos	X	h. Retina/Iris Scans	X
c. Voice Recording/Signatures	X	f. Vascular Scan	X	i. Dental Profile	X
j. Other distinguishing features/biometrics (specify):					

System Administration/Audit Data (SAAD)					
a. User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	X
b. IP Address	X	d. Queries Run	X	f. Contents of Files	X
g. Other system administration/audit data (specify): activities and records related to Department cyber infrastructure, intrusion and network defense					

Other Information (specify)					
See System of Records Notice (SORN) (Department 27) for all Privacy Act records subject to inclusion in this system					

2.2 Indicate sources of the PII/BII in the system. (Check all that apply.)

Directly from Individual about Whom the Information Pertains					
In Person	<input checked="" type="checkbox"/>	Hard Copy: Mail/Fax	<input checked="" type="checkbox"/>	Online	<input checked="" type="checkbox"/>
Telephone	<input checked="" type="checkbox"/>	Email	<input checked="" type="checkbox"/>		
Other (specify):					

Government Sources					
Within the Bureau	<input checked="" type="checkbox"/>	Other DOC Bureaus	<input checked="" type="checkbox"/>	Other Federal Agencies	<input checked="" type="checkbox"/>
State, Local, Tribal	<input checked="" type="checkbox"/>	Foreign	<input checked="" type="checkbox"/>		
Other (specify): Department of Defense (DOD)					

Non-government Sources					
Public Organizations	<input checked="" type="checkbox"/>	Private Sector	<input checked="" type="checkbox"/>	Commercial Data Brokers	<input checked="" type="checkbox"/>
Third Party Website or Application			<input checked="" type="checkbox"/>		
Other (specify): Unknown via anonymous reporting or referrals					

2.3 Describe how the accuracy of the information in the system is ensured.

NS3 ensures security protocols and industry best practices are performed regularly to maintain data integrity. NS3 has multiple system security controls in place and performs the following functions to ensure data integrity.

1. Review and update data on a regular basis
2. Use reliable data resources
3. Ensure the reliability and credibility of the data prior to input into the system
4. Standardize data definitions
5. Perform and use error checking and data validation (restricted invalid data values being entered into system)
6. Need to know access to data (Privilege Access)
7. Access to data based on Role-Based Access for Personnel
8. Multi-factor authentication for system access to data
9. Archive Regularly
10. Verify protocols address data quality and reliability

The technologies used to protect PII/BII on System A include but not limited to the following:

1. Managed boundary protection mechanisms (Firewalls, Routers, Switches, and Encryption Devices such as TACLANE) isolate systems from outsiders and other DOC systems
2. Least privilege access controls using group policy and Active Directory
3. Vulnerability scans are executed weekly to identify vulnerabilities, system software and assess system weaknesses.

2.4 Is the information covered by the Paperwork Reduction Act?

	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
X	No, the information is not covered by the Paperwork Reduction Act.

2.5 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. (*Check all that apply.*)

Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)			
Smart Cards	X	Biometrics	X
Caller-ID	X	Personal Identity Verification (PIV) Cards	X
Other (specify):			

	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
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Section 3: System Supported Activities3.1 Indicate IT system supported activities which raise privacy risks/concerns. (*Check all that apply.*)

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

	There are not any IT system supported activities which raise privacy risk/concerns.
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Section 4: Purpose of the System4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. (*Check all that apply.*)

Purpose			
For a Computer Matching Program		For administering human resources programs	X
For administrative matters	X	To promote information sharing initiatives	
For litigation	X	For criminal law enforcement activities	X
For civil enforcement activities	X	For intelligence activities	X
To improve Federal services online		For employee or customer satisfaction	
For web measurement and customization technologies (single session)		For web measurement and customization technologies (multi-session)	
Other (specify): For mission-critical department-wide security			

Section 5: Use of the Information

5.1 In the context of functional areas (business processes, missions, operations, etc.) supported by the IT system, describe how the PII/BII that is collected, maintained, or disseminated will be used. Indicate if the PII/BII identified in Section 2.1 of this document is in reference to a federal employee/contractor, member of the public, foreign national, visitor or other (specify).

PII/BII that is collected, maintained, or disseminated will be used: This system is used by authorized personnel to maintain records that reflect and support ITMD's mission, including various law enforcement and intelligence functions related to identifying, assessing, and/or managing the Department's mission critical security threats. Threats to the Department's mission include those posed by influential criminal activity; foreign intelligence and security services and non-state actors; terrorism; and extremist groups or unstable persons. Threats also include significant events that may require the Department to take emergency action, such as geopolitical crises, natural disasters, and pandemics. This system will manage all matters relating to the storage, facilitation and enabling of documentation of activities associated with proactive and reactive assessments, complaints, inquiries, and investigations; process and house information and intelligence; identify risks, vulnerabilities, and threats to Department and information assets and activities; and track referrals of potential interest to internal and external partners. It will provide a basis for the development and recommendation of solutions to deter, detect, and/or mitigate potential risks, vulnerabilities, and threats identified, provide statistical reports of ITMD actions, and meet other reporting requirements. Section 2.1 of this document is in reference to the following categories of individuals covered by this system including DOC employees, former employees, and prospective employees; political appointees; research associates and guest workers; interns and detailees to the Department; foreign nationals and locally employed staff working for or with Department employees, and are assigned to or salaried by other U.S. government agencies in locations worldwide; employees of contractors used, or which may be used, by the Department on national security classified projects; employees, principal Officers and company information of some contractors/businesses retained, or which may be retained by the Department, to include subcontractors; individuals who have access, had access, will require access, or attempt access to any Department owned or leased facility, communications equipment, or information technology system; employees of other U.S. government agencies, foreign officials, or members of the public who visit the Department or have or may have other associations with the Department; family members, dependents, relatives, and individuals with a personal association to Department employees, former employees, and prospective employees; principal Officers and employees of organizations, firms, or institutions which were recipients or beneficiaries, or prospective recipients or beneficiaries, of grants, loans, or loan guarantee programs of the Department; subgrantees, lessees, licensees or other persons engaged in official business with the Department; and nominees, members, and former members of public advisory committees, trade missions and export councils.

5.2 Describe any potential threats to privacy, such as insider threat, as a result of the bureau's/operating unit's use of the information, and controls that the bureau/operating

unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

The DOC ITSBP and NS3 Cybersecurity Program establishes policies, procedures, and requirements to protect classified and controlled unclassified information (CUI) that, if disclosed, could cause damage to national security. All users are required to complete security awareness training on recognizing and reporting potential indicators of insider threat. Annual required training courses such as:

- DOC Controlled Unclassified Information (CUI) Basic User Awareness Training
- Cyber Security Awareness Training
- Derivative Classification
- Insider Threat Training
- How to Protect Personally Identifiable Information (PII) and Business Identifiable Information (BII)
- Marking Classified Information

Special Access Programs: A Special Access Program (SAP) is established for a specific class of classified information that imposes safeguarding and access requirements that exceed those normally required for information at the same classification level. Any user that requires SAP is required to take the annual Special Access Programs (SAP) training.

Section 6: Information Sharing and Access

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. (*Check all that apply.*)

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau	X		
DOC bureaus	X		
Federal agencies	X		
State, local, tribal gov't agencies	X		
Public	X		
Private sector	X		
Foreign governments	X		
Foreign entities	X		FVEY
Other (specify):			

The PII/BII in the system will not be shared.

6.2 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

<input checked="" type="checkbox"/>	Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: Department of Defense Information Networks (DoDIN), technical controls include boundary protection mechanisms and network segmentation such as Firewalls, Routers, Switches, DLP and Encryption TACLANE.
	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.3 Identify the class of users who will have access to the IT system and the PII/BII. (*Check all that apply.*)

Class of Users			
General Public		Government Employees	<input checked="" type="checkbox"/>
Contractors (DOC)	<input checked="" type="checkbox"/>		
Other (specify): User access is limited to DOC personnel.			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. (*Check all that apply.*)

	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.
	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: .
	Yes, notice is provided by other means. Specify how:
<input checked="" type="checkbox"/>	No, notice is not provided. Specify why not: Exempt under 5 U.S.C 552a(e)(3)

7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: Exempt under 5 U.S.C. 552a(e)(3)

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
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<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: Exempt under 5 U.S.C. 552a(e)(3)
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7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

<input type="checkbox"/>	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: Exempt under 5 U.S.C. 552a(e)(3)

Section 8: Administrative and Technological Controls

8.1 Indicate the administrative and technological controls for the system. (*Check all that apply.*)

<input checked="" type="checkbox"/>	All users signed a confidentiality agreement or non-disclosure agreement.
<input checked="" type="checkbox"/>	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
<input checked="" type="checkbox"/>	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
<input checked="" type="checkbox"/>	Access to the PII/BII is restricted to authorized personnel only.
<input checked="" type="checkbox"/>	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: The NS3 audit and accountability controls have been implemented to record, monitor and detect unauthorized use of System B. Event logs and policy violation logs are monitored routinely. System B's implements system monitoring through a variety of continuous monitoring tools and techniques (e.g., malicious code protection software, scanning tools, and network monitoring software). Indicators of potential attacks and unauthorized access are monitored by the NS3 system administrators.
<input checked="" type="checkbox"/>	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): <u>8/22/2018</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
<input checked="" type="checkbox"/>	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
<input checked="" type="checkbox"/>	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M).
<input checked="" type="checkbox"/>	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
<input checked="" type="checkbox"/>	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy. Contracts with customers establish DOC ownership rights over data including PII/BII. Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
<input type="checkbox"/>	Other (specify):

8.2 Provide a general description of the technologies used to protect PII/BII on the IT system. (*Include data encryption in transit and/or at rest, if applicable.*)

NS3 uses best practice methods to protect PII for maximum security and regulatory compliance. The technology security measures used to protect PII/BII on System C include but not limited to the following:

1. Managed boundary protection mechanisms (Firewalls, Routers, Switches, and Encryption devices such as TACLANEs) isolate systems from outsiders and other DOC systems.
2. Least privilege access controls using group policy and Active Directory.
3. Automated mechanisms such as IBM BigFix to maintain an up-to-date, complete, accurate, and readily available asset inventory and baseline configuration of the information system.
4. Credentialed vulnerability scans executed weekly to identify vulnerabilities, system software and assess system weaknesses.
5. Intrusion Detection Systems and Intrusion Prevention Systems functions are installed at the firewall interfacing to the DODIN and internal system connections.
6. Data Loss Prevention software (SolarWinds) to ensure sensitive data is not lost, misused, or accessed by unauthorized users.

Section 9: Privacy Act

9.1 Is the PII/BII searchable by a personal identifier (e.g, name or Social Security number)?

Yes, the PII/BII is searchable by a personal identifier.

No, the PII/BII is not searchable by a personal identifier.

9.2 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C.

§ 552a. (A new system of records notice (SORN) is required if the system is not covered by an existing SORN).

As per the Privacy Act of 1974, “the term ‘system of records’ means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”

<input checked="" type="checkbox"/>	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. (<i>list all that apply</i>): Department 13 – Investigative and Security Records Department 25 – Access Control and Identity Management System Department 27 – Investigations and Threat Management Records
<input type="checkbox"/>	Yes, a SORN has been submitted to the Department for approval on (date).
<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

Section 10: Retention of Information

10.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. (*Check all that apply*.)

X	<p>There is an approved record control schedule.</p> <p>Provide the name of the record control schedule: Retention and Disposal: Records relating to persons' access covered by this system are retained in accordance with General Records Schedule 18, Item 17 approved by the National Archives and Records Administration (NARA). Unless retained for specific, ongoing security investigations, for maximum security facilities, records of access are maintained for five years and then destroyed. For other facilities, records are maintained for two years and then destroyed. All other records relating to individuals are retained and disposed of in accordance with General Records Schedule 18, item 22, approved by NARA.</p>
	<p>No, there is not an approved record control schedule.</p> <p>Provide the stage in which the project is in developing and submitting a records control schedule:</p>
	Yes, retention is monitored for compliance to the schedule.
	No, retention is not monitored for compliance to the schedule. Provide explanation:

10.2 Indicate the disposal method of the PII/BII. (*Check all that apply.*)

Disposal			
Shredding	X	Overwriting	
Degaussing	X	Deleting	X
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Level

11.1 Indicate the potential impact that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed. (*The PII Confidentiality Impact Level is not the same, and does not have to be the same, as the Federal Information Processing Standards (FIPS) 199 security impact category.*)

	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
X	High – the loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.

11.2 Indicate which factors were used to determine the above PII confidentiality impact levels. (*Check all that apply.*)

X	Identifiability	Provide explanation: SSN and Birth date identifies individuals.
X	Quantity of PII	Provide explanation: Limited number of authorized users.
X	Data Field Sensitivity	Provide explanation: PII data field contains sensitive PII data.

	Context of Use	Provide explanation:
X	Obligation to Protect Confidentiality	Provide explanation: CNSS, OMB, NIST, and DOC requires protection of PII.
	Access to and Location of PII	Provide explanation:
	Other:	Provide explanation:

Section 12: Analysis

12.1 Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

NS3 limits the amount of PII collected from its sources. NS3 only collects PII directly from the individual or authorized Trusted Agents (TAs).

The TAs are mainly used with new account and Public Key Infrastructure Token request from our field offices. The TAs validate the individual's identity and credentials, transmits the information to NS3. The information is then reverified by the Registration Authority for authorized input into the system.

The internal PII information collected is transferred hand to hand from the individual(s) to the authorized collector and/or transferred via Kite Works (encrypted email). All transmitted information requires two-factor authentication and use of a Personal Identity Verification card for integrity and non-repudiation. NS3 collects the least amount of PII for account establishment and PKI assurance. All data is properly disposed at the end of its life cycle.

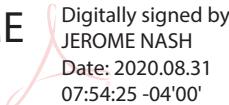
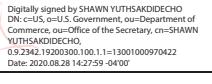
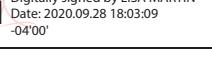
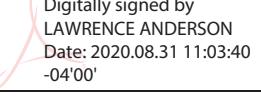
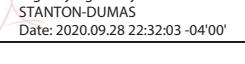
12.2 Indicate whether the conduct of this PIA results in any required business process changes.

	Yes, the conduct of this PIA results in required business process changes.
	Explanation:
X	No, the conduct of this PIA does not result in any required business process changes.

12.3 Indicate whether the conduct of this PIA results in any required technology changes.

<input checked="" type="checkbox"/>	<p>Yes, the conduct of this PIA results in required technology changes.</p> <p>Explanation:</p> <p>Additional privacy controls are required, including encryption and data minimization security controls.</p>
	<p>No, the conduct of this PIA does not result in any required technology changes.</p>

Points of Contact and Signatures

<p>System Owner</p> <p>Name: Jerome Nash Office: OCIO/NS3 Phone: 202.482.5929 Email: jnash@doc.gov</p> <p>I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system.</p> <p>JEROME NASH Signature:  Digitally signed by JEROME NASH Date: 2020.08.31 07:54:25 -04'00'</p> <p>Date signed: _____</p>	<p>Information Technology Security Officer</p> <p>Name: Shawn Yuthsakdidecho Office: OCIO/NS3 Phone: 202.482.5579 Email: syuthsakdidecho@doc.gov</p> <p>I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system.</p> <p>SHAWN YUTHSAKDIKIDECHO Signature:  Digitally signed by SHAWN YUTHSAKDIKIDECHO DN: c=US, o=U.S. Government, ou=Department of Defense, cn=SHAWN YUTHSAKDIKIDECHO 0.9.2342.19205300.100.1.1=13001000970422 Date: 2020.08.28 14:27:59 -04'00'</p> <p>Date signed: _____</p>
<p>Privacy Act Officer</p> <p>Name: Lisa J. Martin Office: OPOG Phone: 202.482.2459 Email: tmurphy2@doc.gov</p> <p>I certify that the appropriate authorities and SORNs (if applicable) are cited in this PIA.</p> <p>LISA MARTIN Signature:  Digitally signed by LISA MARTIN Date: 2020.09.28 18:03:09 -04'00'</p> <p>Date signed: _____</p>	<p>Authorizing Official</p> <p>Name: Lawrence W. Anderson, D.M. Office: CIO Phone: 202.482.4444 Email: landerson@doc.gov</p> <p>I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system.</p> <p>LAWRENCE ANDERSON Signature:  Digitally signed by LAWRENCE ANDERSON Date: 2020.08.31 11:03:40 -04'00'</p> <p>Date signed: _____</p>
<p>Bureau Chief Privacy Officer</p> <p>Name: Maria Dumas Office: OPOG Phone: 202.482.5153 Email: mdumas@doc.gov</p> <p>I certify that the PII/BII processed in this IT system is necessary and this PIA ensures compliance with DOC policy to protect privacy.</p> <p>MARIA STANTON-DUMAS Signature:  Digitally signed by MARIA STANTON-DUMAS Date: 2020.09.28 22:32:03 -04'00'</p> <p>Date signed: _____</p>	

This page is for internal routing purposes and documentation of approvals. Upon final approval, this page must be removed prior to publication of the PIA.