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U.S. Department of Commerce
National Telecommunications and Information Administration (NTIA)

Privacy Threshold Analysis
for the
EL-CID Online (Green) – NTIA038

U.S. Department of Commerce Privacy Threshold Analysis

NTIA/EL-CID Online (Green)

Unique Project Identifier: NTIA038

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).

The purpose of the NTIA038 EL-CID Online Green Major Application (MA), which is a web application with a browser-based user interface is to improve NTIA spectrum certification data quality, reduce system review effort, and provide data dictionary-compliant automation to support spectrum certification data management in an unclassified environment.

Address the following elements:

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

b) *System location*
EL-CID Online Green and its component equipment are physically located in the Consolidated Server Room (CSR), Room 61018 office complex of the Herbert C. Hoover Building (HCHB), in Washington DC and is not open to the public.

c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
EL-CID Online Green is a standalone system composed of three Windows hosts: a DMZ web proxy, a front-end application server, and a backend database server. All are connected by a virtual switch. The computing platform for NTIA038 is entirely virtual Windows Server 2019 hosts. It has the following two interconnections:

NTIA038 connects using TLS version 1.2 to an Active Directory endpoint for the purpose of synchronizing user information such as password and email. This is a read-only arrangement over secure LDAP.

Interconnection between EL-CID Online Green and DISA E2ESS by a logical access link between DISA E2ESS application on NIPRNet and the NTIA EL-CID Online Green system on the DOC Unclassified Network. Data is encrypted via TLS over this link and connections will be limited to specific IP Addresses and certificates via firewall rules on both ends of the link. The servers and firewalls at each endpoint are located in Federally-owned and controlled facilities, guarded twenty-four (24) hours a day.

d) *The purpose that the system is designed to serve*
The purpose of the EL-CID Online is to improve NTIA spectrum certification data quality, reduce system review effort, and provide data dictionary-compliant automation to support spectrum certification data management in an unclassified environment that ensures confidentiality, integrity, and availability.

e) *The way the system operates to achieve the purpose*
EL-CID Online provides NTIA with a highly available tool to manage the Spectrum Certification application and approval process. It is an internal web application with all persistent storage in its database server.

f) *A general description of the type of information collected, maintained, used, or disseminated by the system*
The information in EL-CID Online is business identifiable information (BII).

g) *Identify individuals who have access to information on the system*
Users of EL-CID Online are internal NTIA staff and external agencies. The external system hosted on the DMZ server is accessible to the public and does not require any credentials or authentication. DOD submits certification requests to EL-CID Online via web service calls.

h) *How information in the system is retrieved by the user*
Information retrieval is conducted only on the internal ECO Workflow application. In most cases, information is retrieved through a web interface, however for DoD data is retrieved through their E2ESS system.

i) *How information is transmitted to and from the system*
Information is exchanged with the user-base through secure, encrypted connections whether connecting through the web interface or interconnected through secure channel with DoD. Information is transmitted over a secure connection using HTTPS using TLS version 1.2.

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.).”

__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.”

____ 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

_X___ 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

__X___ The criteria implied by one or more of the questions above **apply** to the EL-CID Online 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.

Information System Security Officer or System Owner Name: Robert Hite Office: NTIA/OPCM Phone: 202-482-4854 Email: rhite@ntia.gov ROBERT HITE Digitally signed by ROBERT HITE Date: 2023.07.31 09:24:44 -04'00' Signature: ______________________ Date signed: ______________________	**Information Technology Security Officer** Name: Arthur Baylor Office: NTIA/OPCM Phone: 202-482-1752 Email: abaylor@ntia.gov ARTHUR BAYLOR Digitally signed by ARTHUR BAYLOR Date: 2023.07.31 17:22:29 -04'00' Signature: ______________________ Date signed: ______________________
Privacy Act Officer Name: Dr. Catrina D. Purvis Office: NTIA/CIO Phone: 202-482-3463 Email: cpurvis@ntia.gov Catrina Purvis Digitally signed by Catrina Purvis Date: 2023.12.26 21:45:32 -05'00' Signature: ______________________ Date signed: ______________________	**Authorizing Official** Name: Dr. Catrina Purvis Office: NTIA/CIO Phone: 202-482-3463 Email: cpurvis@ntia.gov Catrina Purvis Digitally signed by Catrina Purvis Date: 2023.12.26 21:46:44 -05'00' Signature: ______________________ Date signed: ______________________
Bureau Chief Privacy Officer Name: Arthur Baylor Office: NTIA/OPCM Phone: 202-482-1752 Email: cpurvis@ntia.gov ARTHUR BAYLOR Digitally signed by ARTHUR BAYLOR Date: 2023.07.31 17:24:11 -04'00' Signature: ______________________ Date signed: ______________________	