

MEMORANDUM FOR: Bureau Chief Privacy Officers

FROM: Charles R Cutshall
Senior Agency Official for Privacy (SAOP) and
Chief Privacy Officer (CPO)

SUBJECT: Delegation of SAOP Concurrence for the Re-issuance of an
Authorization to Operate (ATO)

In accordance with the Office of Management and Budget (OMB) Memorandum 14-04 and Commerce policy regarding Senior Agency Official for Privacy (SAOP) approval as a pre-condition for the issuance/re-issuance of an Authorization to Operate (ATO), I hereby appoint the Bureau Chief Privacy Officers (BCPOs) to act on behalf of the SAOP for concurrence of Privacy Impact Assessments (PIAs) for personally identifiable information (PII) processing systems eligible for the re-certification process, as well as for conducting Compliance Review Board (CRB) meetings for PII processing systems with a LOW PII confidentiality impact level.

The criteria for PII processing systems eligible for the re-certification process are:

- The last CRB meeting was held within three (3) years.
- There is a current SAOP approved PIA (good for one (1) year only).
- There are not any changes which create new privacy risks.
- There are not any new collections of PII/Business Identifiable Information (BII).

The criteria for conducting CRB meetings for PII processing systems with a LOW PII confidentiality impact level are:

- The PII confidentiality impact level has been deemed LOW by the SAOP.
- There are not any new collections of PII/BII which would increase the PII confidentiality impact level to moderate or high.

The BCPO must ensure that the Privacy Threshold Analysis (PTA), Privacy Impact Assessment (PIA), and PIA Annual Review Certification Form, if applicable, are submitted to the SAOP at CPO@doc.gov within three (3) work days of BCPO concurrence of a PIA on behalf of the SAOP.

The delegation may be terminated at any time by written notice by the SAOP.

Attachment

MEMORANDUM FOR: Charles R Cutshall
Senior Agency Official for Privacy (SAOP) and
Chief Privacy Officer (CPO)

FROM: _____
Bureau Chief Privacy Officer (BCPO)

SUBJECT: BCPO Concurrence of Privacy Impact Assessment (PIA)

I certify that the following criteria has been met for _____:
(Name of PII processing system)

BCPO Re-certification:

- ☐ The PII confidentiality impact level is: ☐ Low ☐ Moderate ☐ High
- ☐ The last Compliance Review Board (CRB) meeting was held on _____.
- ☐ The current SAOP approved PIA expires on _____.
- ☐ There are not any changes which create new privacy risks.
- ☐ There are not any new collections of PII/BII.
- ☐ The following sections of the PIA have been updated accordingly (*check all that apply*):
 - ☐ Section 1.1 (Status of the Information System)
 - ☐ Section 8.1 (Administrative and Technological Controls – most recent Assessment and Authorization date)
 - ☐ Section 12.2 (Analysis - Required Business Process Changes)
 - ☐ Section 12.3 (Analysis – Required Technology Changes)
 - ☐ Current certification signatures on the PTA and PIA.

BCPO CRB Meeting (*LOW PII Confidentiality Impact Level only*):

- ☐ The CRB meeting was held on _____.
- ☐ Date of SAOP concurrence of LOW PII confidentiality impact level: _____.
- ☐ Basis for BCPO exercise of SAOP CRB delegated authority.
 - Check one of the following:
 - ☐ There are not any new collections of PII/BII.
 - ☐ There are new collections of PII/BII that do not change the PII confidentiality impact level.
- ☐ The appropriate security and privacy controls are in place and/or there is an approved Plan of Action and Milestones. The date of the annual review was conducted on _____.

The following documents are attached (*check all that apply*):

- ☐ PTA
- ☐ PIA
- ☐ PIA Annual Review Certification Form