

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



**Privacy Impact Assessment**  
**for the**  
**Associate Directorate for Decennial Census Programs (ADDCP)**  
**American Community Survey Office (ACSO)**

Reviewed by: Byron Crenshaw, Bureau Chief Privacy Officer

- ☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer  
☐ Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

**BYRON CRENSHAW**

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Date: 2022.09.13 09:47:49 -04'00'

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

Date

**U.S. Department of Commerce Privacy Impact Assessment  
U.S. Census Bureau/ADDCP American Community Survey Office (ACSO)**

**Unique Project Identifier: 006-000400100**

**Introduction: System Description**

*Provide a brief description of the information system.*

The American Community Survey Office (ACSO) system is a major application that maintains American Community Survey (ACS). The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year.

The ACS questionnaires and survey instruments are used to collect data from the Housing Unit (HU) and Group Quarters (GQ) population. Some of the information collected by the components in the ACSO IT system are: name, address, age, sex, race, family and relationships, income and benefits, health insurance, education, veteran status, disabilities, where you work and how you get there, where you live and how much you pay for some essentials and food stamp benefits.

Address the following elements:

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

The American Community Survey Office (ACSO) system is considered a major application. The system maintains American Community Survey (ACS) data stored and processed in Statistical Analysis System (SAS) environments on Census Bureau servers.

*(b) System location*

These servers are located in the Bowie Computer Center (BCC) and are accessed by workstations within the American Community Survey Office (ACSO) and other groups around the Census Bureau headquarters.

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

The system interconnects with the following systems:

- Office of the Chief Information Officer (OCIO) Field (FLD), Application Development and Services Division (ADSD) - to support Stateside and Puerto Rico (PR) ACS Housing Unit (HU) Data Collection, and Group Quarters (GQ) Data Collection, including Remote Alaska (RA) and Federal Prisons.

- Associate Director for Research and Methodology (ADRM) Center for Economic Studies (CES) - to deliver the American Community Survey data to the Center for Enterprise Dissemination in order to integrate administrative records data
- Associate Director for Field Operations (ADFO) National Processing Center (NPC) - to support American Community Survey and Puerto Rico Community Survey (PRCS).
- Associate Director for Demographic Programs (ADDP) Population (POP), Demographic and Survey Division (DSD), Social Economic and Housing statistics Division (SEHSD) - to allow ACSO to transfer POP Estimates
- ADDCP Geography (GEO) – to support frame creation, sample collection, and data product generation.

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

The ACS questionnaires and survey instruments are used to collect data from the Housing Unit (HU) population. Some of the information collected by the components in the ACSO IT system are: name, address, age, sex, race, family and relationships, income and benefits, health insurance, education, veteran status, disabilities, where you work and how you get there, where you live and how much you pay for some essentials and food stamp benefits.

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

The ACSO staff use statistical software to refine the data, then make edited datasets available to users within the Census Bureau. Only employees assigned to ACS projects will have access to this data.

Once the questionnaires are received, they undergo a data preparation process. The broad purpose of data preparation and processing is to take the response data gathered from each survey collection and format it in a way that it can be used to produce survey estimates. Files that need editing, known as edit input files, are created during the data preparation phase by merging operational status information for each Housing Unit and Group Quarters facility with the files that include the survey response data. The combined data must go through a number of processing steps before they are ready to be tabulated. Once the edit input files are prepared, the edit and imputation process is initiated. Editing and imputation ensure that the final data are consistent and complete. Subject matter analysts thoroughly examine and approve the results of the edit and imputation process.

*For production purposes, PII is not used to retrieve records, but for limited uses, PII can be retrieved. PII such as name and address are kept in separate files and only used in processes such as editing, amputation, geography, etc. A non-PII key is created for each record.*

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

Data is collected by internet, mail, telephone, and in person. Data collection instruments are used for all four of these modes of data collection.

- The internet instrument is a web-based system where respondents use a respondent ID to access and complete the questionnaire.
- Mail questionnaires are received, processed in batch, and sent to the data capture unit in the Census Bureau's National Processing Center (NPC).
- The telephone instrument is used for telephone assisted interviews in the telephone questionnaire assistance (TQA) and failed edit follow-up (FEFU).
- The personal interview instrument is a computer-assisted personal interview (CAPI) instrument that utilizes in-person interviewers that conduct interviews for data collection on the computer.

The ACS questionnaires and survey instruments are used to collect data from the Housing Unit (HU) and Group Quarters (GQ) population. The system primary process of operation is through the use of multimode data collection strategy using paper, internet, telephone, and personal follow up.

*(g) Any information sharing*

Datasets are shared within the Census Bureau on a case-by-case basis, as it is needed for sampling for other approved Title 13 surveys, or for research purposes when approval is given. Information is shared with the following OCIO Field, ADDP Demographic Census, Surveys, and Special Processing, ADFO National Processing Center, ADDCP Geography, and the ADRM Center for Enterprise Dissemination IT systems.

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

Title 13, U.S.C., Sections 141, and 193

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

Moderate

**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.
- \_\_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.

## **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*		f. Driver's License		j. Financial Account	
b. Taxpayer ID		g. Passport		k. Financial Transaction	
c. Employer ID		h. Alien Registration		l. Vehicle Identifier	
d. Employee ID		i. Credit Card		m. Medical Record	
e. File/Case ID					
n. Other identifying numbers (specify):					
*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 <sup>1</sup>
b. Maiden Name		i. Place of Birth	X	p. Medical Information	
c. Alias		j. Home Address	X	q. Military Service	X
d. Gender	X	k. Telephone Number	X	r. Criminal Record	
e. Age	X	l. Email Address	X	s. Marital Status	
f. Race/Ethnicity	X	m. Education	X	t. Mother's Maiden Name	
g. Citizenship	X	n. Religion			
u. Other general personal data (specify):					

<sup>1</sup> Includes the type of health insurance/health coverage plans including disability.

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<b>Work-Related Data (WRD)</b>					
a. Occupation	X	e. Work Email Address		i. Business Associates	
b. Job Title		f. Salary	X	j. Proprietary or Business Information	
c. Work Address	X	g. Work History		k. Procurement/contracting records	
d. Work Telephone Number		h. Employment Performance Ratings or other Performance Information			
l. Other work-related data (specify):					

<b>Distinguishing Features/Biometrics (DFB)</b>					
a. Fingerprints		f. Scars, Marks, Tattoos		k. Signatures	
b. Palm Prints		g. Hair Color		l. Vascular Scans	
c. Voice/Audio Recording		h. Eye Color		m. DNA Sample or Profile	
d. Video Recording		i. Height		n. Retina/Iris Scans	
e. Photographs		j. Weight		o. Dental Profile	
p. Other distinguishing features/biometrics (specify):					

<b>System Administration/Audit Data (SAAD)</b>					
a. User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	
b. IP Address	X	f. Queries Run		f. Contents of Files	
g. Other system administration/audit data (specify):					

<b>Other Information (specify)</b>

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

<b>Directly from Individual about Whom the Information Pertains</b>					
In Person	X	Hard Copy: Mail/Fax	X	Online	X
Telephone	X	Email			
Other (specify):					

<b>Government Sources</b>					
Within the Bureau		Other DOC Bureaus		Other Federal Agencies	X
State, Local, Tribal		Foreign			
Other (specify):					

<b>Non-government Sources</b>					
Public Organizations		Private Sector		Commercial Data Brokers	X
Third Party Website or Application					

Other (specify):
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### 2.3 Describe how the accuracy of the information in the system is ensured.

Staff using the American Community Survey Office IT system use numerous statistical methodologies and strategies to ensure the accuracy of the data collected. Including regular reviews to detect patterns of improper procedures or falsification and also editing the data for accuracy and consistency.

The American Community Survey Office IT system uses a multitude of security controls mandated by the Federal Information Security Management Act of 2002 (FISMA) and various other regulatory control frameworks including the National Institute of Standards and Technology (NIST) special publication 800 series. These security controls include but are not limited to the use of mandatory HTTPS for public facing websites, access controls, anti-virus solutions, enterprise auditing/monitoring, encryption of data at rest, and various physical controls at Census Bureau facilities that house Information Technology systems. The Census Bureau also deploys an enterprise Data Loss Protection (DLP) solution as well.

### 2.4 Is the information covered by the Paperwork Reduction Act?

X	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection. 0607-0810
	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		Biometrics	
Caller-ID		Personal Identity Verification (PIV) Cards	
Other (specify):			

X	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 Activities**

### 3.1 Indicate IT system supported activities which raise privacy risks/concerns. *(Check all that apply.)*

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

X	There are not any IT system supported activities which raise privacy risks/concerns.
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## **Section 4: Purpose of the System**

- 4.1 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	
For administrative matters		To promote information sharing initiatives	
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
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): Data is collected for statistical purposes (i.e. Census/Surveys) to support American Community Survey.			

## **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 is collected from the public to produce national statistical information. The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. To help communities, state governments, and federal programs, we ask about a variety of topics, such as:

- age
- sex
- race
- family and relationships
- income and benefits
- health insurance



- education
- veteran status
- disabilities
- where you work and how you get there
- where you live and how much you pay for some essentials

The information collected provides aggregated statistical data that is used to help decide everything from school lunch programs to new hospitals.

- 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 U.S. Census Bureau use of data/information presents possible threats such as internal breaches caused by employees within an organization. Today's most damaging security threats are not originating from malicious outsiders or malware but from trusted insiders - both malicious insiders and negligent insiders. Inside threats are not just malicious employees that intend to directly harm the Bureau through theft or sabotage. Negligent employees can unintentionally cause security breaches and leaks by accident. To prevent or mitigate potential threats to privacy the U.S. Census Bureau has put into place mandatory training for all system users. All Census Bureau employees and contractors undergo mandatory annual data stewardship training to include proper handling, dissemination, and disposal of BII/PII/Title 13/Title 26 data.

In addition, the Census Bureau Information technology systems employ a multitude of layered security controls to protect PII/BII at rest, during processing, as well as in transit. These NIST 800-53 controls, at a minimum, are deployed and managed at the enterprise level, including, but not limited to the following:

- Intrusion Detection | Prevention Systems (IDS | IPS)
- Firewalls
- Mandatory use of HTTP(S) for Census Bureau Public facing websites
- Use of trusted internet connection (TIC)
- Anti-Virus software to protect host/end user systems
- Encryption of databases (Data at rest)
- HSPD-12 Compliant PIV cards
- Access Controls

The Census Bureau Information technology systems also follow the National Institute of Standards and Technology (NIST) standards including special publications 800-53, 800-63, 800-37 etc. Any system within the Census Bureau that contains, transmits, or processes BII/PII has a current authority to operate (ATO) and goes through continuous monitoring on a yearly basis to ensure controls are

implemented and operating as intended. The census Bureau also deploys a Data Loss Prevention solution.

The information in the American Community Survey Office is handled, retained, and disposed of in accordance with appropriate federal record schedules.

## **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			
Federal agencies			
State, local, tribal gov't agencies			
Public			
Private sector			
Foreign governments			
Foreign entities			
Other (specify):  Shared with other approved Title 13 surveys, as needed for sampling or for research purposes when approval is given.	X		

<input type="checkbox"/>	The PII/BII in the system will not be shared.
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- 6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

X	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input type="checkbox"/>	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input type="checkbox"/>	No, the bureau/operating unit does not share PII/BII with external agencies/entities.

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

X	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII.</p> <p>Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>Systems in this plan interconnect with systems which support the following operations: The system interconnects with the following systems:</p> <ul style="list-style-type: none"> <li>• OCIO Field (FLD), Application Development and Services Division (ACSD) - to support Stateside and Puerto Rico (PR) ACSO Housing Unit (HU) Data Collection, including the Remote Alaska (RA) operation and Group Quarters (GQ) Data Collection operations for stateside, PR, and RA, including Federal Prisons.</li> <li>• ADRM Center for Economic Studies (CES) - to deliver the community survey data to the Center for Enterprise Dissemination in order to integrate administrative records data</li> <li>• ADFO National Processing Center (NPC) - to support the American Community Survey (ACS) and Puerto Rico Community Survey (PRCS).</li> <li>• ADDP Population (POP), Demographic and Survey Division (DSD), Social Economic and Housing statistics Division (SEHSD) - to allow ACSO to transfer POP Estimates</li> <li>• ADDCP Geography (GEO) – to support frame creation, sample collection, and data product generation</li> </ul>
	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.4 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	X
Contractors	X		
Other (specify): All contractors are special sworn status and access the systems either on-site or via the Virtual Desktop Infrastructure (VDI). There is no remote access outside of VDI.			

## **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.)*

X	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
X	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: <a href="https://www.census.gov/about/policies/privacy/privacy-policy.html">https://www.census.gov/about/policies/privacy/privacy-policy.html</a>	
X	Yes, notice is provided by other means.	Specify how: The respondent is provided an explanation that PII is collected, maintained, or disseminated by the IT system through various respondent letters and brochures.

	No, notice is not provided.	Specify why not:

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:
X	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: The ACS is a mandatory survey. According to Title 13, Section 221(Census, Refusal or neglect to answer questions; false answers) of the United States Code, persons who fail or refuse to respond to the mail-back census form, or refuse to respond to a follow-up census taker can be fined up to \$100. Persons who knowingly provide false information to the census can be fined up to \$500.

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:
X	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: Respondents are instead informed of the uses of their responses for statistical purposes only and are allowed to decline to respond to any particular survey question

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

X	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how: When responding to survey questions by paper or by internet, the respondent can review the answers they provide to the Census Bureau.
	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

## **Section 8: Administrative and Technological Controls**

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

X	All users signed a confidentiality agreement or non-disclosure agreement.
X	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
X	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
X	Access to the PII/BII is restricted to authorized personnel only.

X	<p>Access to the PII/BII is being monitored, tracked, or recorded.</p> <p>Explanation:</p> <p>Only authorized government/contractor personnel are allowed to access PII/BII within a system. Authorizations for users occur yearly, at a minimum in accordance with applicable Bureau, Agency, and Federal policies/guidelines. In addition to system processes that handle PII/BII, all manual extractions for PII/BII are logged and recorded per Department of Commerce Policy, the NIST 800-53 Appendix J Privacy Control Catalog, and specifically NIST control <i>AU-03, Content of Audit records</i>.</p>
X	<p>The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements.</p> <p>Provide date of most recent Assessment and Authorization (A&amp;A): ____ June 30, 2022 ____</p> <p><input type="checkbox"/> This is a new system. The A&amp;A date will be provided when the A&amp;A package is approved.</p>
X	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
X	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).
X	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
X	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.
	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).*

Census Bureau Information technology systems employ a multitude of layered security controls to protect BII/PII at rest, during processing, as well as in transit. These NIST 800-53 controls, at a minimum, are deployed and managed at the enterprise level including, but not limited to the following:

- Intrusion Detection | Prevention Systems (IDS | IPS)
- Firewalls
- Mandatory use of HTTP(S) for Census Public facing websites
- Use of trusted internet connection (TIC)
- Anti-Virus software to protect host/end user systems
- Encryption of databases (Data at rest)
- HSPD-12 Compliant PIV cards
- Access Controls

Census Bureau Information technology systems also follow the National Institute of Standards and Technology (NIST) standards including special publications 800-53, 800-63, 800-37 etc. Any system within the Census Bureau that contains, transmits, or processes BII/PII has a current authority to operate (ATO) and goes through continuous monitoring on a yearly basis to ensure controls are implemented and operating as intended. The Census Bureau also deploys a Data Loss Prevention (DLP) solution/tool as well.

## **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."

X	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>  COMMERCE/CENSUS-5, Decennial Census Programs- <a href="http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html">http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html</a>
	Yes, a SORN has been submitted to the Department for approval on (date).
	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	There is an approved record control schedule. Provide the name of the record control schedule:  GRS 3.1, 3.2, 4.3 and DAA-0029-2015-0001
	No, there is not an approved record control schedule. Provide the stage in which the project is in developing and submitting a records control schedule:
X	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.)*

<b>Disposal</b>			
Shredding	X	Overwriting	
Degaussing	X	Deleting	
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 level. *(Check all that apply.)*

X	Identifiability	Provide explanation:  PII/BII collected can be directly used to identify individuals
X	Quantity of PII	Provide explanation:  The collection is for Census Bureau Censuses and surveys, therefore, approximately 3.58 million households annually would be affected if there was loss, theft or compromise of the data.
X	Data Field Sensitivity	Provide explanation:  The PII/BII, alone or in combination, are directly usable in other contexts thus making the individual or organization vulnerable to harms, such as identity theft, embarrassment, loss of trust, or cos
X	Context of Use	Provide explanation:  Disclosure of the act of collecting and using the PII/BII in this IT system or the PII/BII may result in severe or catastrophic harm to the individual or organization.
X	Obligation to Protect Confidentiality	Provide explanation:  PII/BII collected is required to be protected in accordance with organization or mission- specific privacy laws, regulations, mandates, or organizational policy apply that add more restrictive requirements to government- wide or industry-specific requirements. Violations may result in severe civil or criminal penalties.
X	Access to and Location of PII	Provide explanation:

		PII/BII is located on computers controlled by the Census Bureau or on mobile devices or storage media. Access is limited to certain populations of the Census Bureau's workforce and limited to Special Sworn Status individuals. Access is only allowed by organization-owned equipment outside of the physical locations, and only with a secured connection.
	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.)

Although this IT system can only be accessed by authorized individuals that have a business need to know, the potential risk from insider threat to the organization, which may cause harm such as identity theft, embarrassment, loss of trust, or cost, still exists. The Census Bureau conducts routine security awareness training on recognizing and reporting potential indicators of insider threat. Insider threat is always possible. In addition to the security protocols already described in this assessment, the Census Bureau limits access to sensitive information to sworn employees who have an authorized business need to know.
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- 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.

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