

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



Privacy Impact Assessment
for the
Associate Director for Economic Programs (ADEP) Economic
Census and Surveys and Special Processing

Reviewed by: Donna Neal, 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

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Date

U.S. Department of Commerce Privacy Impact Assessment
U.S. Census Bureau/ Associate Director for Economic Programs (ADEP)
Economic Census and Surveys and Special Processing
ADEP EAD System Authorization Boundaries

Unique Project Identifier: 006-000401400

Introduction: System Description

Provide a brief description of the information system.

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

The Census Bureau's Economic Programs Directorate is responsible for statistical programs that measure and profile U.S. businesses and government organizations. This includes conducting an Economic Census and a Census of Governments every five years; over 100 separate surveys taken monthly, quarterly, annually, or periodically, including principal economic indicators; voluminous export and import statistics produced monthly; extensive compilations of administrative records; and numerous research and technical studies.

The Directorate conducts a number of surveys under reimbursable agreements with other Federal agencies such as the Bureau of Justice Statistics, the National Center for Education Statistics, the Bureau of Transportation Statistics, the Federal Reserve Board, the National Science Foundation, the Environmental Protection Agency, the Agency for Healthcare Research and Quality, the Department of Energy, and the Departments of Housing and Urban Development.

Address the following elements:

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

Associate Director for Economic Programs (ADEP) Economic Census and Surveys and Special Processing consists of major applications, Business Register (BR), Standard Economic Processing System (StEPS), Micro Analytical Database (MADb), eCorrespondence and minor general support systems to support Economic statistics and survey collection.

(b) System location

All applications reside on servers located in the Census Bureau Computer Center or within a secured cloud (Public or Government) environment located in Eastern and Northwestern parts 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)

The systems within ADEP Economic Census and Surveys and Special Processing interconnect with systems internal and external to Census and are as follows:

- Office of the Chief Information Officer (OCIO) Data communications
- OCIO Centurion
- OCIO Field
- Internal Revenue Service (IRS)
- Social Security Administration (SSA)

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

The Economic Directorate utilizes the IT system for statistical purposes:

The U.S. Census Bureau Economic Programming Directorate is responsible for statistical programs that measure and profile businesses and government organizations in the United States. ECON activities are wide reaching and include: (1) conducting an Economic Census and a Census of Governments every five years; (2) conducting over 100 current surveys taken monthly, quarterly, and annually, including twelve principle economic indicators for the U.S economy; (3) the compilation of administrative records from other government agencies; and (4) facilitating numerous research and technical studies.

The IT system has various applications. The applications are designed to accommodate numerous surveys with differing requirements and support all aspects of survey processing. Integrated modules that perform administrative functions allow users to modify the application to meet survey requirements. The surveys process both Title 13 and Title 26 data excluding the construction monthly surveys, which are project based. These applications provide data entry, editing, imputation, data review and correction, estimation, and variance estimation. Also, the Census Bureau's master list of businesses called the Business Register (BR). The primary mission of the BR is to provide a complete, unduplicated universe of statistical units that can be used to construct business survey sampling frames and provide a basis for Economic Census enumeration.

The survey information contained in the Business Register, which is used as the mailing list for the Economic Census and the primary sampling frame for virtually all other business surveys, is collected to track the movement of commodities from businesses throughout the United States. As such, the names, addresses, and other identifying characteristic data are vital to the mission of the Economic Directorate.

Economic surveys that handle Personally Identifiable Information (PII)/Business Identifiable Information (BII) and interact with the Business Register (BR) are used for statistical purposes and to understand the state of the U.S. economy.

Surveys that track industry trends examine how these trends have changed health insurance coverage over time. The data is used for national benchmarking estimates on how Americans use and pay for their health care services. This collection includes information from household respondents about their health conditions, use of medical services, and their health insurance coverage. The following is also collected: supplemental information from doctors, hospitals, and home health agencies and is linked to the household survey; information about nursing home residents and nursing home facilities; and information from employers who provide health insurance to their employees and periodically includes a subset linked to the household survey.

Economic indicator surveys measure activity in the services sector of the economy. Indicator series track current economic activity and are closely followed and widely used by policy makers in the public and private sectors. PII/BII is in reference to the business establishment selected for the survey (mailing forms and contacting the respondent) and is only collected for the purpose of conducting the survey and generating aggregate statistics. No PII/BII is disseminated at the respondent level, nor is it shared with other agencies.

Quarterly surveys on the rates of capacity utilization for the U.S. manufacturing and publishing sectors is collected for statistics on establishment operational status, value of actual production, estimated production attainable at full and emergency conditions, and reasons for operating at less than full production capacity. The survey also collects data on work patterns by shift. These data include days per week in operation, plant hours per week in operation, and weeks in operation in the quarter. The Federal Reserve Board benchmarks this data for monthly estimates of capacity output and utilization to analyze the change in use of capital, capital stocks and inputs related to capacity growth. The Department of Defense uses the data to assess readiness to meet demand for goods under selected national emergency scenarios.

Annual surveys help to measure U.S. current economic performance. Using a sample of about 70,000 service firms, this survey collects revenue; expenses; e-commerce sales; and for some industries, exports, inventories, class of customer, and detail product lines based on the North American Product Classification System (NAPCS). Data is disseminated only at an aggregate level and suppressed if it could lead a user to reasonably deduct the source. The government uses the data to determine economic policy. Private industry relies on this data for planning and research.

Surveys pertaining to the Business Owner Program, contains all survey responses, sampling data, and administrative records and responses are loaded from the National Processing

Center (NPC), Business Register, and other administrative sources. This survey system also performs batch and interactive editing, produces estimates, and performs related survey processing.

Construction owners and builder respondent's complete economic surveys regarding the construction and sales status of homes sampled and data for two principal economic indicators are produced: New Residential Construction (housing starts and housing completions) and New Residential Sales. In addition, a number of other statistical series are produced, including extensive information on the physical characteristics of new residential buildings, and indexes measuring rates of inflation in the price of new buildings.

Builders, owners, bookkeepers or contract specialists are contacted to complete surveys regarding the construction expenditures of construction projects sampled and data for the Value of Construction Put in Place principal economic indicator are produced from this survey. In addition, a number of other statistical series are produced, including information on the length of time of construction, the average cost per unit of new residential units and geographic breakdown of the private nonresidential construction.

Manufacturing survey data tracks the movement of commodities from Businesses throughout the United States and provides broad-based monthly statistical data on current economic conditions and indications of future production commitments in the manufacturing sector. This data collected from a panel of approximately 4,500 reporting units, is not selected based on a probability sample. Units may be divisions of diversified large manufacturing companies, large homogenous manufacturing companies, or single-unit manufacturers. Data describe activities taking place during the calendar month. There are 66 industry categories collected to estimate total durable goods and 23 industry categories to estimate nondurable goods. Data is collected electronically via OCIO Centurion internet reporting Computer Assisted Telephone Interview (CATI) (within the OCIO Field Division) for data reporting by phone, or in person interviews for some business owner surveys. Data Uses: (1) Bureau of Economic Analysis: Uses the Advance Report in making GDP estimates and compiling the principal economic indicator series. (2) Federal Reserve Board and Council of Economic Advisers: Use the Advance Report for developing fiscal and monetary policy. (3) The Conference Board: Uses data from the Advance Report as two components of the index of leading economic indicators.

In addition to existing survey inquiries, inquiries added between 2017-2020 Economic Census and Report of Organization questionnaires provide estimations of royalty and license fees for use of intellectual property, contract manufacturing services purchased and provided, operating revenues, and net sales data. A large portion of the described Economic survey data is processed within two Economic Standard Economic Processing Systems StEPS and StEPS II that are customized on a survey-by-survey basis in order to meet the specific needs and requirements for each survey. Post-collection processes such as editing, imputation, data

review and correction, data query, estimation, analysis tools, disclosure, and variance estimation support functions for collection technologies that include mail-out, check-in, data capture, and follow-up.

The Census Bureau uses a secure data transfer system that does not connect directly with external systems, however, is an automated system that provides one way transfer to Census from partner agencies to support administrative data collection. Census Bureau core programs receiving data via the secure data transfer systems must have approved agreements in place.

The Economic Directorate utilizes the IT system for administrative matters:

The Economic Directorate survey areas uses BII to create mailing lists of registered businesses and supplies mail outs to authorized business respondents that receive authorization codes to submit responses for economic-related surveys housed in OCIO Centurion, which is accessed via the eCorrespondence portal. The eCorrespondence portal collects only enough data to confirm the identity of the individual and create an account for self-service, survey support, and survey collection functionality.

The Economic Directorate utilizes the IT system to improve Federal services online:

Both the Economic and Communications Directorate use eCorrespondence's Pega CRM to improve Federal services online. This sub-component of the eCorrespondence portal web application performs several survey-related transactions that improve customer support interaction with the Census Bureau. For the OCIO Data Communications, eCorrespondence CRM provides the Census Bureau the capability to capture, route, track and respond to every visitor-initiated query that comes through the Census.gov channels. eCorrespondence CRM also provides business partners and respondents direct support for assistance with registration or logging in to access OCIO Centurion survey data collection system through single sign-on, requests for time extensions for completing surveys, delegating a survey to another authorized individual, assistance with specific survey responses via secure messaging, a Frequently Asked Questions (FAQ) database and subscription service for real-time notifications for new FAQ updates and information. Designated Census Bureau Support representatives for eCorrespondence/Pega CRM view submitted customer cases and respond via secure messaging to provide direct, interactive support.

The Economic Directorate utilizes the IT system for customer satisfaction and online services:

For eCorrespondence, there are two main transaction types in the eCorrespondence system. The first is a respondent self-help transaction. A business respondent logs in and authenticates via a component in the OCIO Data Communications security boundary to access the eCorrespondence web application and performs one or more survey-related

transactions. This includes requesting delegation of a survey to another individual or accessing the OCIO Centurion survey data collection system through single sign-on, etc.

The second type of transaction is a support request. These transactions are managed by the Pega CRM tool. A business respondent can request direct support for a specific survey via secure messaging. Similarly, an anonymous user can submit a message for general support (e.g., for help registering or logging into the website). Support representatives view the submitted secure messages as cases and respond to customers providing interactive support. Only internal Census Bureau staff with a need-to-know may access or view these records.

The goal of the eCorrespondence project is to deliver a platform for both incoming and outgoing interactions with customers that can be reused across the Census Bureau by all directorates. Internally, eCorrespondence Pega will allow Census Helpdesk support staff to receive customer inquiries organized into cases and provide resolutions while performing outbound communication based on customer preferences and business rules. PII/BII is collected to support user account management for survey related transactions. Additionally, the system is also used to document data dissemination activities and to capture interactions with data users. It is also used to track all Census Bureau partnership activities and activities between the Census Bureau and outside organizations.

The Census Bureau will also use machine learning, web scraping/crawling, and artificial intelligence to improve the quality of data without increasing respondent burden. Machine learning is a type of artificial intelligence (AI) used to improve a model's ability to predict over time without changing the model itself. Web scraping/crawling will collect publicly available in a much more efficient way than manually searching the web. Web scraping refers to extracting data from the internet in an automated way. Web crawling refers to the process of automatically browsing the internet - going from site to site, link to link. The Automated Internet Data Collection Review Board (AIDCRB), and possibly the Disclosure Avoidance Review Board (DRB) must approve these technologies before using.

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

Information (whether personally identifiable information (PII) or business identifiable information (BII)) collected by this IT system are personal names, personal addresses, personal contact information (telephone numbers, email address), business information, occupation, tax information, account information, etc. The information is retrieved by PII/BII by Census Bureau staff who have a business need to know. Only Census Bureau employees and their agents with Special Sworn Status can access data under Title 13, U.S.C. Section 23 (c) permits the Census Bureau to provide Special Sworn Status to individuals who must access Census Bureau data to assist the Census Bureau in carrying out the work of its title.

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

Data is transferred through secure data transfer systems. Encryption is implemented for data in transit using SSL/HTTPS to ensure secure transmission of data. Web services utilize encrypted security tokens during transmission of data to prevent data access outside of an authenticated and valid session and is also implemented for data at rest in the databases. For the secure transfer systems, no PII/BII is collected, maintained, or disseminated by the systems. These systems are strictly used for the transfer of data. Additional information on the collection, maintenance, and dissemination of PII/BII is included in the individual approved data sharing agreements that the secure transfer systems support.

The secure transfer systems also work in hand with survey data processed via StEPS I/II for seamless secure transfer of survey files.

eCorrespondence utilizes unique, one-time use Authentication Codes mailed to respondents for each survey in which the respondent participates.

(g) Any information sharing

The information in this IT system is shared within the Census Bureau and with other federal agencies such as the Bureau of Justice Statistics, National Center for Education Statistics, Bureau of Transportation Statistics, the Federal Reserve Board, National Science Foundation, U.S. Environmental Protection Agency, Agency for Healthcare Research and Quality, Department of Energy, and the U.S. Department of Housing and Urban Development. In addition, information is shared to the private sector via the Management and Organizational Practices Survey (MOPS) data that is given to the survey sponsors (at Stanford, Massachusetts Institute of Technology, London School of Economics, and the University of Toronto).

Because of the web form component within Pega Customer Relations Management (CRM) system, there is potential internal sharing of encrypted PII, BII or Title 26 data if it is included by the respondent within the web form messages. Internally, eCorr CRM allows Census Helpdesk Support staff to receive customer inquiries organized into cases and provide resolutions, while performing outbound communication based on customer preferences and business rules.

In addition to the customer service and self-service platform, Pega CRM also shares paradata from cases, which includes CEM customer PII/BII, contacts, commitment activities, and events and transfers the data analytics and reporting to the Customer Experience Management (CEM) managed by the OCIO directorate. This sub-component gives Economic (ECON), the Center of New Media and Promotions (CNMP), and Human Resource Directorate (HRD) customers, i.e., business respondents, partners, potential hires¹, and data seekers, the ability to interact with

¹ Data collected by the HRD Talent Acquisition Programs Branch (TAPB) is voluntary and includes name, email address and educational characteristics that is utilized by TAPB staff only for work-related purposes, which includes evaluating the

Census Bureau customer service representatives (CSRs) to respond to their questions about specific recruitment information or surveys they are authorized to access.

Other data shares include a one-way exchange of data from ADEP Economic Census to the OCIO Field Division to support analysis and reporting of survey response rate information for company and manufacture surveys. This data share is internal to survey managers and researchers.

ECON survey paradata is also internally shared with the OCIO Field Division, which tracks inputs of survey paradata for data collection and capture and produces outputs of the input data for retrieval by ECON surveys. ECON survey paradata is also shared internally with OCIO Centurion.

ECON data may be shared with external agencies/entities. If there is an agreement between Census and an external agency, if the agreement says the data is only to be shared between ECON system and the external agency for the term of the agreement, then yes there is limitation on re-dissemination. However, if the agreement period is over and if the other agency has the data requested, external agency re-dissemination is out of scope of the ECON system.

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

13 U.S.C., Chapter 5, 6, 8(b), 131, 161, 182, 193, and OMB Circular A-133; For the e-correspondence web application and PEGA CRM system, the following authorities apply: 5 U.S.C. 301 and 44 U.S.C. Section 3101; Section 6103, Subsections (O) and (n) of the Internal Revenue Code.

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

The Federal Information Processing Standard (FIPS) 199 security impact category for this system is Moderate.

qualifications of, and engaging with candidates to fill vacancies if they have expressed interest in learning more about Census opportunities.

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 | X |
| b. Taxpayer ID | X | g. Passport | | k. Financial Transaction | X |
| c. Employer ID | X | h. Alien Registration | | l. Vehicle Identifier | |
| d. Employee ID | X | i. Credit Card | | m. Medical Record | |
| e. File/Case ID | X | | | | |
| 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 |
| b. Maiden Name | X | i. Place of Birth | X | p. Medical Information | X |
| 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): | | | | |

| | | | | | |
|---------------------------------------|---|--|---|--|---|
| 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 | X |
| c. Work Address | X | g. Work History | X | k. Procurement/contracting records | |
| d. Work Telephone Number | X | h. Employment Performance Ratings or other Performance Information | | | |
| l. Other work-related data (specify): | | | | | |

| | | | | | |
|--|---|--------------------------|--|--------------------------|--|
| Distinguishing Features/Biometrics (DFB) | | | | | |
| a. Fingerprints | | f. Scars, Marks, Tattoos | | k. Signatures | |
| b. Palm Prints | | g. Hair Color | | l. Vascular Scans | |
| c. Voice/Audio Recording | X | 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): | | | | | |

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

| | | | | | |
|---|--|--|--|--|--|
| Other Information (specify) | | | | | |
| Federal Tax Information such as: Business name, legal form of business, business revenue, number of employees, Business 1040 data, Title 26 Administrative Data, North American Industry Classification System (NAICS); Health Provider, Health Insurance Coverage, Federal program participation | | | | | |

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 | X | Hard Copy: Mail/Fax | X | Online | X |
| Telephone | X | Email | X | | |
| Other (specify): | | | | | |

| | | | | | |
|---------------------------|---|-------------------|---|------------------------|---|
| Government Sources | | | | | |
| Within the Bureau | X | Other DOC Bureaus | X | Other Federal Agencies | X |

| | | | | | |
|----------------------|---|---------|--|--|--|
| State, Local, Tribal | X | Foreign | | | |
| Other (specify): | | | | | |

| | | | | | |
|------------------------------------|---|----------------|---|-------------------------|---|
| Non-government Sources | | | | | |
| Public Organizations | X | Private Sector | X | Commercial Data Brokers | X |
| Third Party Website or Application | | | X | | |
| Other (specify): | | | | | |

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

Information accuracy assurance occurs for ADEP Economic Census and Surveys and Special Processing survey systems. The accuracy of the data transferred by the secure transfer systems is ensured through the use of data integrity checking (hashing) of file content, detection of transfer errors, and recovery from points of failure.

The secure transfer systems ensure secure encryption transfer by hashing each packet of data using algorithms. The result(s) of the hashes are transmitted with each packet of data and encrypted. Encryption is done in-stream, packet by packet, and transmitted to the destination server. Algorithms are then used to hash the data and compare the result to the hash performed at origination. Both hash results must be equal to ensure that the data has not been compromised in transit. At the end of the file transmission, the connection is closed. Completed data transfers utilize automated rule-based routing (scripting) at destination endpoints for secondary (PIK) processing and quality assurance (QA) against control files.

Within the Business Register, a checksum is performed on every file before and after transfer of data from the system. In addition, analysts are responsible to ensure the data submitted in a given file is accurate. Analysts conduct internal quality assurance processing on all files received from external agencies. Once Analysts conduct QA and approve a file, it is loaded to the Business Register. Additional pre-editing functions are performed to verify validity of specific fields against stored table values, verify data fields are within a specific configured value range, make sure data fields that are dependent on other fields data are configured properly and remove duplicate IDs that are submitted.

eCorrespondence distributes unique, one-time use Authentication Codes mailed to respondents for each survey the respondent participates. Algorithms are implemented within the system to secure authentication codes. When registering or adding a survey to an existing eCorrespondence account, Authentication Codes are verified against data provided by Centurion and eCorrespondence associates a survey to a user account in the eCorrespondence database and updates the authentication code bank that the authentication code has been used. Pega CRM provides transactional updates to the eCorrespondence database and queries authentication code status to ensure the code is valid for a specific respondent and associated survey.

Data flagging rules that alert analysts to variances in data that are out of line with expected values, are also implemented to verify that the data that the respondent has entered into the data collection systems have populated into the processing system correctly. This is usually done by comparing reported data with known information that is received from the IRS or from the same company that is reporting similar or related data to another Census Bureau survey.

In addition, surveys utilize historic trend analysis and industry trend analysis to alert analysts to potential reporting errors. If dispositions or flags are encountered, survey and system analysts review the potential problems and resolve the issues by generating cases and contacting the respondent to verify the reported values. Analysts are responsible to review data regularly through review and correction modules within Econ processing systems and compare reported values to publicly available data. Testing of the system occurs regularly and whenever a change in the data being collected is implemented.

Custom systems are also utilized to ensure the accuracy of data being reported by respondents by incorporating survey specific flagging rules that alert analysts to variances in data that are out of line with expected values. For example, surveys may use defined parameter edits, respondent correspondence, company website information and comparisons to previous year estimates to check data accuracy as well as edit referrals. Also, those who respond to the survey via OCIO Centurion are shown alerts if a data item fails a parameter edit.

2.4 Is the information covered by the Paperwork Reduction Act?

| | |
|---|---|
| X | <p>Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.</p> <p>There are numerous surveys within the ADEP Economic Census and Surveys and Special Processing systems. Census has obtained approval from OMB for the collection of survey information per each survey. Individual Paperwork Reduction Act control numbers are assigned to surveys with 10 or more respondents.</p> |
| | 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. |
|---|--|

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): Web Scraping/Crawling, Artificial Intelligence, and machine learning | | | |

| | |
|--|--|
| | There are not any IT system supported activities which raise privacy risks/concerns. |
|--|--|

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 | X | To promote information sharing initiatives | |
| For litigation | | For criminal law enforcement activities | |
| For civil enforcement activities | | For intelligence activities | |
| To improve Federal services online | X | For employee or customer satisfaction | X |
| For web measurement and customization technologies (single-session) | | For web measurement and customization technologies (multi-session) | |
| Other (specify): For statistical purposes (i.e, censuses & surveys) | | | |

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).

For Statistical Purposes: The Census Bureau will use the PII/BII information collected through the Economic Census and various surveys maintained in ADEP Economic Census and Surveys and Special Processing IT systems to produce national statistical information. The information that is collected, processed, and/or maintained within ADEP Economic Census and Surveys and Special Processing applications is in reference to members of the public and businesses.

An example of one of the surveys conducted would be the Annual Capital Expenditures Survey (ACES), which provides broad-based statistics on business spending for new and used structures and equipment.
Another example would be, the Annual Retail Trade Survey (ARTS), which uses Business Identifiable Information (BII) to contact the business and obtain the business' financial information.

For administrative matters: The Economic Directorate survey areas use data to create mailing lists of registered businesses. This mailing list designates which individuals receive an authorization code in the mail so that they can submit data for economic-related surveys that are housed in OCIO Centurion, which is accessed via the eCorrespondence portal. Use of IRS data allows the ECON directorate to identify the proper individuals who will submit data on behalf of their companies. The eCorrespondence portal collects only enough data to confirm the identity of the individual and create an account for self-service, survey support, and survey collection functionality. The PII/BII is in reference to members of the public and businesses.

To improve Federal services online: The Economic Directorate utilizes the eCorrespondence web application sub-component for approved Census Bureau customers to access survey data. This application performs several survey-related transactions that improve services. For example, users can request a time extension for completing surveys, delegating a survey to

another individual, or accessing the OCIO Centurion survey data collection system through single sign-on. For the OCIO Communications Directorate, the purpose of the system is to provide the Census Bureau the capability to capture, route, track and respond to every visitor-initiated query that comes through the Census.gov channels. It also allows the Census Bureau to manage its Frequently Asked Questions (FAQ) database and allows website visitors to view and subscribe to receive email notifications when FAQs are updated and can provide real-time customer support by allowing web visitors to submit inquiries via a chat interface. The PII/BII is in reference to members of the public and businesses.

For employee or customer satisfaction: For eCorrespondence, there are two main transaction types in the eCorrespondence system. The first is a respondent self-help transaction. A business respondent logs in and authenticates via a component in the OCIO Data Communications security boundary to access the eCorrespondence web application and performs one or more survey-related transactions. This includes requesting delegation of a survey to another individual or accessing the OCIO Centurion survey data collection system through single sign-on, etc. The second type of transaction is a support request. These transactions are managed by the Pega CRM tool. A business respondent can request direct support for a specific survey via secure messaging. Similarly, an anonymous user can submit a message for general support (e.g., for help registering or logging into the website). Support representatives view the submitted secure messages as cases and respond to customers providing interactive support. Only internal Census Bureau staff with a need-to-know may access or view these records. The goal of the eCorrespondence project is to deliver a platform for both incoming and outgoing interactions with customers that can be reused across the Census Bureau by all directorates. Internally, eCorrespondence Pega will allow Census Helpdesk support staff to receive customer inquiries organized into cases and provide resolutions while performing outbound communication based on customer preferences and business rules. PII/BII is collected to support user account management for survey related transactions. Additionally, the system is also used to document data dissemination activities and to capture interactions with data users. It is also used to track all Census Bureau partnership activities and activities between the Census Bureau and outside organizations. The PII/BII is in reference to members of the public, employees and businesses.

Information is collected about U.S. Census Bureau employees, contractors, and other federal government employees for access to system account and management purposes only.

- 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 and a security operations center to monitor all Census IT system on a 24/7/365 basis.

ADEP Economic Census and Surveys and Special Processing IT systems adhere to Census Bureau Data Safeguard, Retention and Acceptable Use Policies that outline the handling of electronic and printed material, proper backup, disposal and recovery of data, user access and data management. Data labeling is in place for systems that handle Federal Tax Information (FTI).

Encryption is implemented for data in transit using SSL/HTTPS to ensure secure transmission of data. Web services utilize encrypted security tokens during transmission of data to prevent access to data outside of an authenticated and valid session. Transparent Data Encryption (TDE) is also implemented for data at rest in the databases.

Consistent system and audit monitoring occurs to validate user and system actions. Suspicious activity is reported to the BOC CIRT within one hour of identification and internal infrastructure and application investigation occurs in parallel with CIRT response investigations to ensure timely remediation.

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* | X** | X |
| DOC bureaus | | X | |
| Federal agencies | X | X | X |
| State, local, tribal gov't agencies | | | |
| Public | | | |
| Private sector | | | X*** |
| Foreign governments | | | |
| Foreign entities | | | |
| Other (specify): | * It may be possible the encrypted PII of internal users in the correspondent | **Note: Bulk transfer of Title 13 information | ***Management and Organizational Practices Survey |

| | | | |
|--|--|----------------------------------|---|
| | web/Pega CRM application may be shared internally within the Census Bureau to support and respond to requests. Additionally, T13 protected paradata is also shared internally. | only from the Business Register. | (MOPS) data is shared with the survey sponsors (at Stanford, Massachusetts Institute of Technology, London School of Economics, University of Toronto). |
|--|--|----------------------------------|---|

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

6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

| | |
|----------------|---|
| X ² | Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII. |
| X ³ | No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII. |
| | 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. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>Interconnections: OCIO Field Division, OCIO Centurion, and OCIO Data Communications</p> <p>The ADEP Economic Census and Surveys and Special Processing IT system uses a multitude of security controls mandated by the Federal Information Security Management Act of 2014 (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 a Data Loss Prevention solution and a security operations center to monitor all Census IT system on a 24/7/365 basis.</p> |
| | 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.)*

² If there is an agreement between Census and an external agency, if the agreement says the data is only to be shared between ECON system and the external agency for the term of the agreement, then yes there is limitation. However, if the agreement period is over and if the other agency has the data requested, external agency re-dissemination is out of scope of ECON system.

| Class of Users | | | |
|---|----|----------------------|---|
| General Public | X* | Government Employees | X |
| Contractors | X | | |
| Other (specify): *The public will only have access to their own PII/BII | | | |

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: https://www.census.gov/about/policies/privacy/privacy-policy.html | |
| X | Yes, notice is provided by other means. | Specify how: Survey and census introductory letters incorporate Privacy Act Statements; mailout letters distributed to survey respondents explain that PII/BII may be collected and maintained for account management purposes. |
| | No, notice is not provided. | Specify why not: |

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

| | | |
|---|---|--|
| X | Yes, individuals have an opportunity to decline to provide PII/BII. | Specify how: Various surveys maintained by the ADEP Economic Census and Surveys and Special Processing IT system are voluntary and therefore not required to provide PII/BII. Respondents for voluntary surveys may opt out from creating an eCorrespondence account and submitting survey data. |
| X | No, individuals do not have an opportunity to decline to provide PII/BII. | Specify why not: A majority of surveys and the Economic Census are mandatory as required by 13 U.S.C. Individuals are informed of this by one of the following: Privacy Act Statement upon login, letter, interview, or during data collection. Mandatory surveys do not provide an opportunity to decline. All respondents are required to use eCorrespondence and register to respond to surveys. |

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

| | | |
|---|---|--|
| X | Yes, individuals have an opportunity to | Specify how: Response to some surveys is voluntary and |
|---|---|--|

| | | |
|---|--|--|
| | consent to particular uses of their PII/BII. | therefore not required to provide PII/BII or consent to particular uses. |
| X | No, individuals do not have an opportunity to consent to particular uses of their PII/BII. | Specify why not: A majority of surveys and the Economic Census data maintained by the ADEP Economic Census and Surveys and Special Processing IT system are mandatory as required by 13 U.S.C. The data are used for statistical and administrative purposes only and as stated in the Privacy Act Statement provided to respondents; those surveys for which response is not mandatory, there is no opportunity to consent. Respondents are legally obligated to answer all the questions, as accurately as possible. |

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: Economic Census and surveys are maintained by the ADEP Economic Census and Surveys and Special Processing IT system, individuals have the opportunity to provide updates to PII/BII data on the submitted survey or on the survey website; within the eCorrespondence portal, respondents are able to review/update PII/BII pertaining to them via their registration account handled by a component within OCIO Data Communications. |
| | 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 | Access to the PII/BII is being monitored, tracked, or recorded. Explanation: 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 AU-03, <i>Content of Audit records</i> . |
| X | 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>6/30/2023</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved. |
| 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. |
| X | Contracts with customers establish DOC ownership rights over data including PII/BII. |
| X | Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers. |
| X | Other (specify): Publications are cleared with the Disclosure Review Board. |

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).

| |
|--|
| <p>The 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:</p> <ul style="list-style-type: none"> • 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 • Systems communicate with the Centurion server(s) using a two-way connection protected by FIPS 140-2 validated encryption mechanisms. • Interconnections are established using TCP protocol and TLS v1.2 for transport layer security. • Oracle Transparent Data Encryption (TDE) for encryption of databases (Data at rest) • HSPD-12 Compliant PIV cards • Access Controls <p>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 as well.</p> <p>The PII/BII data can only be viewed by a Census federal employee or licensed contractor who has completed up to date training for both Data Stewardship (Title 13) and Title 26 data. The information can only be accessed on a need to know basis. Employees must use a Census-issued machine (desktop or laptop), or through a secured Virtual Desktop Interface (VDI) session from an approved location for teleworking purposes. Data is stored on local servers, which have been configured to meet all applicable security standards adhered to by the Economic Infrastructure Support (EIS).</p> |
|--|

Section 9: Privacy Act

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

 X 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 | <p>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>:</p> <p>COMMERCE/CENSUS-4, Economic Survey Collection: https://www.commerce.gov/opog/privacy-privacy-act/system-records-notice/system-records-notice-commerce-census-4</p> <p>COMMERCE/DEPT-23, Information Collected Electronically in Connection with Department of Commerce Activities, Events, and Programs: https://www.commerce.gov/opog/privacy/SORN/SORN-DEPT-23</p> <p>COMMERCE/DEPT-25, Access Control and Identity Management System: https://www.commerce.gov/opog/privacy/SORN/SORN-DEPT-25</p> |
| | Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> . |
| | 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. Provide the name of the record control schedule:</p> <p>N1-029-10-2, N1-029-10-3, N1-029-12-004, N1-029-10-4</p> <p>Company Statistics Division N1-29-10-1</p> <p>Economic Surveys Division N1-29-03-1 NC1-29-80-15, NC1-29-79-4, NC1-29-78-15 NC1-29-78-8</p> <p>Manufacturing and Construction Division NC1-29-81-10</p> <p>GRS 3.1: General Technology Management Records; GRS 3.2: Information Systems Security Records; 4.1: Records Management Records; 4.2: Information Access and Protection Records; and GRS 4.3: Input Records, Output Records, and Electronic Copies.</p> |
| | <p>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:</p> |
| X | Yes, retention is monitored for compliance to the schedule. |
| | No, retention is not monitored for compliance to the schedule. Provide explanation: |

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

| Disposal | | | |
|------------------|---|-------------|---|
| Shredding | X | Overwriting | X |
| Degaussing | | 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 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 Economic Surveys, therefore, a severe or catastrophic number of individuals 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 and make the individual or organization vulnerable to harms, such as identity theft, embarrassment, loss of trust, or costs. |
| 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 itself 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: The PII is located on computers (including laptops) and on a network, and IT systems controlled by the Census Bureau. Access is limited to those with a need-to-know |

| | | |
|--|--------|--|
| | | including the Census Bureau regional offices and survey program offices, etc. Access is allowed by Census Bureau-owned equipment outside of the physical locations owned by the Census Bureau only with a secure connection. Backups are stored at Census Bureau-owned facilities. PII is also located on U.S. Census Bureau authorized vendor systems. Access is limited to those with a need-to-know for authorized U.S. Census Bureau contractors and employees. |
| | 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.

The Census Bureau now provides survey response online to reduce paper mail outs and collection of the current survey. ECON surveys utilize electronic survey submission of business respondent data currently through systems such as the collection of survey data in OCIO Centurion via eCorrespondence. To ensure respondents are authorized to access and/or submit data related to the survey they are participating in, respondents receive one-time use authentication codes that they are required to input during account username and password registration into the eCorrespondence portal. The authentication code is linked to the respondents PII/BII and survey they are responding to. In addition, if a respondent forgets their password, respondents must respond to Knowledge Based Verification (KBV) questions to validate they are the person authorized to access the system and data by a specified registered account in accordance with NIST 800-63 Digital Identity Guidelines.

- 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. |