

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



**Privacy Impact Assessment**  
**for the**  
**Office of the Chief Information Officer (OCIO) Computer Services**  
**Division (CSVD) Network Services**

Reviewed by: Donna Neal, Bureau Chief Privacy Officer

- ☒ 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/OCIO CSVD Network Services**

**Unique Project Identifier:** [Number]

**Introduction: System Description**

*Provide a brief description of the information system.*

OCIO Computer Services Division (Network Services) consists of servers and server management tools that are primarily administered by CSVD. A server is a computer or operating system that provides resources, data, services, or programs to other computers, known as clients, over a network. OCIO Network Services supports the Census Bureau's mission to collect United States (U.S.) statistical data. CSVD's mission is to provide the Census Bureau and other customers with a world-class computer center using state-of-the-art technology to monitor systems, communications, and applications.

In addition, the OCIO CSVD Network Services general support system hosts/contains the Census Bureau IT systems that may use, store, and maintain Personally Identifiable Information (PII)/Business Identifiable Information (BII) received from the public through surveys, censuses, or from other IT systems that use, store and maintain other PII such as administrative and personnel data. OCIO CSVD Network Services administrators have access to this data only in support of managing the server environment. CSVD manages the server OS and is not the data owner. CSVD

OCIO CSVD Network Services does not collect, maintain, or perform dissemination of PII/BII information; the IT systems hosted on OCIO Network Services servers perform information dissemination.

Address the following elements:

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

OCIO CSVD Network Services is a general support system.

*(b) System location*

The OCIOCSVD Network Services servers are located at the U.S. Census Bureau's Bowie Computer Center, Headquarters, and the Regional Offices.

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

OCIO CSVD Network Services connects with and hosts all Census Bureau IT systems that store and maintain PII/BII information. Authentication information is received from OCIO Telecommunications Office (TCO) Data Communications IT systems.

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

OCIO CSVD Network Services consists of servers that are primarily managed by the CSVD. The servers operate by hosting IT applications, systems, and/or tools managed by other Census Bureau directorates. The PII/BII is maintained on OCIO CSVD Network Services server infrastructure for Storage Area Network (SAN) storage; data is not disseminated.

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

Information is not retrieved at the server level by personal identifier but may be retrieved by the hosted IT systems. Therefore, OCIO CSVD Network Services is not a Privacy Act system of records.

The information retrieved from IT systems containing PII/BII that are hosted on the OCIO CSVD Network Services servers are governed by the system of record notice(s) (SORN(s)) specific to the record types stored within the IT system and must be used in accordance with the purpose(s) identified in the SORN.

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

OCIO CSVD Network Services administrators manage the server infrastructure. PII/BII is not transmitted by the OCIO CSVD Network Services servers or server management tools; only the IT systems hosted on the servers transmit information.

*(g) Any information sharing*

IT Systems hosted on the server infrastructure may share PII/BII, however the OCIO CSVD Network Services servers and server management tools do not share PII/BII.

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

It has been determined that OCIO CSVD Network Services is not a system of records. As a result, IT systems containing PII/BII that are hosted on the OCIOCSVD Network Services

servers are governed by the SORN(s) specific to the record types stored within the IT system and must be used in accordance with the purpose(s) enumerated in the SORN. The legal authorities for each IT system, containing PII/BII hosted on the OCIO CSVD Network Services servers, can be located in its respective SORN.

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

The FIPS 199 security impact category for the system is **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.)

<b>Changes That Create New Privacy Risks (CTCNPR)</b>					
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.)

<b>Identifying Numbers (IN)</b>					
a. Social Security*	X	f. Driver's License	X	j. Financial Account	X
b. Taxpayer ID	X	g. Passport	X	k. Financial Transaction	X
c. Employer ID	X	h. Alien Registration	X	l. Vehicle Identifier	X
d. Employee ID	X	i. Credit Card	X	m. Medical Record	X
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: SSN could reside within IT systems, residing on OCIO CSVD Network Services server infrastructure. Other PIAs for IT systems hosted on OCIO CSVD Network Services servers will contain SSN justifications, as applicable.

**General Personal Data (GPD)**

a. Name	X	h. Date of Birth	X	o. Financial Information	X
b. Maiden Name	X	i. Place of Birth	X	p. Medical Information	X
c. Alias	X	j. Home Address	X	q. Military Service	X
d. Gender	X	k. Telephone Number	X	r. Criminal Record	X
e. Age	X	l. Email Address	X	s. Marital Status	X
f. Race/Ethnicity	X	m. Education	X	t. Mother's Maiden Name	X
g. Citizenship	X	n. Religion	X		
u. Other general personal data (specify):					

**Work-Related Data (WRD)**

a. Occupation	X	e. Work Email Address	X	i. Business Associates	X
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	X
d. Work Telephone Number	X	h. Employment Performance Ratings or other Performance Information	X		
l. Other work-related data (specify):					

**Distinguishing Features/Biometrics (DFB)**

a. Fingerprints	X	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	X	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	X
g. Other system administration/audit data (specify):					

**Other Information (specify)**


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

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

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

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

<p>The server operating system maintains file systems. The server operating system does not ensure the accuracy of the data governed by the program area that hosts on the server operating systems. Program areas must ensure the accuracy of the information.</p> <p>CSVD</p>
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## 2.4 Is the information covered by the Paperwork Reduction Act?

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

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

Technologies Used Containing PII/BII Not Previously Deployed (TUCBPNPD)			
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.)*

<b>Activities</b>			
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.)*

<b>Purpose</b>			
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		For employee or customer satisfaction	
For web measurement and customization technologies (single-session)		For web measurement and customization technologies (multi-session)	
Other (specify): To provide infrastructure capabilities for Census Bureau IT Systems.			

### **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 administrative matters:**

Authentication information is received from OCIO TCO Data Communications for Census Bureau employees and contractors for authentication purposes. This is used to provide access to the servers.

**Other: To provide infrastructure capabilities for Census Bureau IT Systems:**

PII/BII received from other IT systems covered by other directorates is maintained on OCIO CSVD Network Services server infrastructure for Storage Area Network (SAN) storage; data is not disseminated. This data refers to all PII/BII maintained by other Census Bureau information systems – including data received from the public through surveys, federal employees, contractors, foreign nationals, and visitors.

- 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, accidental leaks, and misuse of information. 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 servers (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 OCIO CSVD Network Services is processed, retained and disposed of in accordance with appropriate federal record schedules.

The Census Bureau also has controlled phishing campaigns to test administrative personnel. The Census Bureau has a program to manage data that is printed to ensure it's destroyed properly; OCIO CSVD Network Services has a storage device destruction program.

## **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			
DOC bureaus			
Federal agencies			
State, local, tribal gov't agencies			
Public			
Private sector			
Foreign governments			
Foreign entities			
Other (specify):			

X	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?

	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
X	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>OCIO CSVD Network Services connects with/receives data from all Census Bureau IT systems.</p> <p>The OCIO CSVD Network Services IT system uses a multitude of security controls mandated by the Federal Information Security Modernization 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 facilities that house Information Technology systems. The Census Bureau also deploys an enterprise Data Loss Protection (DLP) solution as well.</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.)*

Class of Users			
General Public		Government Employees	X
Contractors	X		
Other (specify):			

## **Section 7: Notice and Consent**

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

	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
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.html">https://www.census.gov/about/policies/privacy.html</a>	
X	Yes, notice is provided by other means.	Specify how: PII/BII is received from other Census Bureau IT systems; notice is provided by the program area for Privacy Act systems of records that are maintained by these other IT systems via a Privacy Act Statement.
	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: PII/BII is automatically received from other Census Bureau IT systems; therefore there is not an opportunity to decline to provide PII/BII at the OCIO CSVD Network Services system level.

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: PII/BII is automatically received from other Census Bureau IT systems; therefore there is not an opportunity to consent to particular uses of PII /BII at the OCIO CSVD Network Services system level.

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

	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
X	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: PII/BII is automatically received from other Census Bureau IT systems; therefore there is not an opportunity to review/update PII/BII at the OCIO CSVD Network Services system level.

## **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, audit logs are in place and assessed per NIST control AU-03, <i>Content of Audit records</i> .
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): <u>07/26/2023</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 5 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 (POAM).
X	A security assessment report has been reviewed for the supporting information system and it has been determined that there are no additional privacy risks.
	Contracts with customers establish ownership rights over data including PII/BII.
	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
X	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
	Other

- 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 that contains, transmits, or processes PII/BII 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 DLP solution 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."

	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>
	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
X	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>GRS 2.2 item 071 GRS 2.4 item 40 GRS 3.1 GRS 3.2 GRS 4.2 GRS 5.1 and 5.2 Demographic Directorate: N1-29-99-5, N1-29-89-3, N1-29-87-3, N1-29-12-001, NC1-29-85-1, N1-29-99-5 Economics Directorate: N1-029-10-2, N1-029-10-3, N1-029-12-004, N1-029-10-4 Company Statistics: Division N1-29-10-1 Economic Surveys Division: N1-29-03-1NC1-29-80-15 Manufacturing and Construction: Division NC1-29-81-10 Decennial Directorate:</p>
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	N1-29-05-01, N1-29-10-5 American Community Survey 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 stored/ maintained can be directly used to identify individuals
X	Quantity of PII	Provide explanation: The collection is for all Census Bureau Censuses and surveys and any other records containing PII, 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 PII/BII in this IT system 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, Title 5, Title 13, and Title 26. Violations may result in severe civil or criminal penalties.
X	Access to and Location of PII	PII/BII is located on servers controlled by the Census Bureau. Access is limited to Census Bureau's workforce and Special Sworn Status individuals. Access is only allowed by organization owned equipment outside of the physical locations, and only with a secured connection.
X	Other:	

## **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 Special Sworn Status individuals who have an authorized business need to know.

- 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.