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

Privacy Threshold Analysis
for the
Associate Director for Field Operations (ADFO) National
Processing Center (NPC)

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/ Associate Director for Field Operations (ADFO) National Processing Center (NPC

Unique Project Identifier: 006-00403600

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system: *Provide a brief description of the information system.*
The E-Government Act of 2002 defines "information system" by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: "Information system" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

The survey information collected in ADFO NPC components are wide ranging and contain Business Identifiable (BII) Information and Personally Identifiable Information (PII). Some of the economic survey information collected are employer identification number, addresses, financial, and transactional data. An example of some of the demographic and economic surveys processed by ADFO NPC components are: The American Community Survey, Company Organization Survey, Special Censuses, and the Survey of Income and Program Participation. ADFO NPC also houses and manages call center collection. Data is captured for aggregation. Calls to respondents are recorded for coaching, quality control, and falsification investigations. Recordings reside in an encrypted format on dedicated servers and are used by authorized monitors, coaches or managers. Access is granted through an application using Remedy ticket control system. Collection online is for business, demographic, and agricultural data.

Address the following elements:

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

The Associate Director for Field Operations (ADFO) National Processing Center IT (NPC) system is a General Support system.

b) *System location*

The ADFP NPC is located at the Census Bureau's National Processing Center (NPC) in Jeffersonville, IN with Paper Data Capture Centers (PDCCs) in Jeffersonville, IN and Phoenix, AZ and Call Centers (CCs) at Jeffersonville and Tucson, AZ.

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

The ADFO NPC and peripherals are connected on the same Wide Area Network as the Census Bureau in Suitland and Bowie, Md. Internal connections are documented with Interconnection Security Agreements (ISA). Other inputs and outputs to the United States Postal Service for administrative address corrections are guided under publicly available agreements. Partnership agreements with the United States Department of Agriculture provide for data transfer for the Agricultural Census. A Memorandum of Understanding and ISA between the Department of Labor (DOL), Wage and Hourly Division and ADFO NPC allows for movement of data from ADFO NPC to DOL.

d) *The purpose that the system is designed to serve*

NPC is a national center for collecting, capturing, and delivering timely, high-quality data products and services for demographic and economic surveys, agricultural, economic, and decennial census programs. NPC implements the design and methodology provided by 1 sponsor organizations for mail-out and mail-back, call handling and help functions. The purpose is extended to the PDCCs and CCs.

e) *The way the system operates to achieve the purpose*

The ADFO NPC receives seed data in the form of addresses from sponsor divisions that are candidate respondent's addresses. The organization is capable of processing the seed data immediately through telephone interviewers using Computer Assisted Telephone Interviewing from the Jeffersonville or Tucson Call Centers. ADFO NPC offers Document Services that assist in designs and then prints forms for mailing consistent with specifications of the sponsoring Divisions. ADFO NPC prints addresses on designed instruments then mails them through the United States Postal Service (USPS) with Postal paid return envelopes. The respondent either fills the questionnaire Census response or mails it back. The instrument may be a set of instructions or a questionnaire that contains instructions that provide access to sponsor designed and sponsor-maintained WEB interfaces. Respondent may choose to enter their responses there. NPC maintains staff who also have access to the WEB to assist respondents who choose to use that method. NPC processes respondent questionnaires

received via USPS using state of the art data capture systems. Raw data is placed on a secure data bus and sent back to the sponsor for aggregation and analysis.

f) *A general description of the type of information collected, maintained, used, or disseminated by the system*

Projects cover a wide variety of data management and collection including the collection of personally identifiable information (PII) and business identifiable information (BII) for surveys and censuses.

g) *Identify individuals who have access to information on the system*

The NPC has delegated Human Resources (HR) authority. HR maintains records for a workforce of clerical and professional Federal employees supplemented with a few contractors. All employees swear an oath to protect the confidentiality of all data. The experienced and capable workforce for mass processing of various censuses and surveys make NPC a unique and valuable asset in the Federal data processing facilities inventory.

h) *How information in the system is retrieved by the user*

Data at the NPC is not available to the public. ADFO NPC might be considered the Census input device for all kinds of data, similar to the keyboard on a computer. Federal workforce and select contractors use dedicated United States Government Computing Base compliant workstations built to rigid Census desktop standards to interface with applicable servers. Secure protocols   provide the channel for information to be retrieved by the employees. Users are granted access to data on a need-to-know basis and must use unique credentials over PIV-II standard identification and authentication mechanisms. The data is searchable by unique identifiers.

i) *How information is transmitted to and from the system*

ADFO NPC employs the Census Bureau Enterprise Service Bus (ESB) to put and get data transmissions from dedicated file servers or directories.

Questionnaire:

1. Status of the Information System
1a. What is the status of this information system?

_____   This is a new information system. *Continue to answer questions and complete certification.*

_____   This is an existing information system with changes that create new privacy risks.
Complete chart below, continue to answer questions, and complete certification.

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions		d. Significant Merging		g. New Interagency Uses	
b. Anonymous to Non-Anonymous		e. New Public Access		h. Internal Flow or Collection	
c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Character of Data	
j. Other changes that create new privacy risks (specify):					

_____   This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*

__X__   This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment. *Skip questions and complete certification.*

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

_____   Yes. This is a new information system.

_____   Yes. This is an existing information system for which an amended contract is needed.

_____   No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.

__X__   No. This is not a new information system.

2. Is the IT system or its information used to support any activity which may raise privacy concerns?
NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

_____ Yes. *(Check all that apply.)*

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

_____ No.

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

   As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

   _____ Yes, the IT system collects, maintains, or disseminates BII.

   _____ No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate PII?

   As per OMB 17-12: "The term PII refers to information that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual."

   _____ Yes, the IT system collects, maintains, or disseminates PII about: *(Check all that apply.)*

   _____ DOC employees
   _____ Contractors working on behalf of DOC
   _____ Other Federal Government personnel
   _____ Members of the public

   _____ No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

_____ Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

_____ No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

_____ Yes, the IT system collects, maintains, or disseminates PII other than user ID.

_____ No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4d. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

_____ Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

_____ No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the SAOP approved PIA must be a part of the IT system's Assessment and Authorization Package.

CERTIFICATION

__X___   The criteria implied by one or more of the questions above **apply** to the Associate Director for Field Operations (ADFO) National Processing Center (NPC) and as a consequence of this applicability, a PIA will be performed and documented for this IT system.

_____   The criteria implied by the questions above **do not apply** to the Associate Director for Field Operations (ADFO) National Processing Center (NPC) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

System Owner	**Chief Information Security Officer**
Name: Alfred R. Davis Office: Assistant Division Chief Technology and Support, National Processing Center Phone: 812-218-3362 Email: alfred.r.davis@census.gov Signature: _____ Date signed: _____	Name: Beau Houser Office: Office of Information Security Phone: 301-763-1235 Email: beau.houser@census.gov Signature: _____ Date signed: _____
Privacy Act Officer	**Authorizing Official**
Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: _____ Date signed: _____	Name: Luis J. Cano Office: Office of the Chief Information Officer Phone: 301-763-3968 Email: luis.j.cano@census.gov Signature: _____ Date signed: _____
Business Authorizing Official	**Bureau Chief Privacy Officer**
Name: Timothy P. Olson Office: Associate Director for Field Operations Phone: 301-763-2072 Email: timothy.p.olson@census.gov Signature: _____ Date signed: _____	Name: Byron Crenshaw Office: Policy Coordination Office Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: _____ Date signed: _____