

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



Privacy Threshold Analysis
for the
Decennial

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/CEN08 Decennial

Unique Project Identifier: [006-000400400]

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 and its purpose:

Provide a general description (in a way that a non-technical person can understand) of the information system that addresses the following elements:

Decennial is a collection of applications, technologies, and supporting infrastructure established to support the Decennial Census Programs' mission. Applications support hiring and management efforts, data collection and processing, data management and reporting, content security and 2020 Census close out activities.

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

Decennial manages the development and implementation of decennial census applications and systems utilized by the Decennial Census Program to produce statistics and consists of applications and systems that collect, maintain and process, and/or disseminate data collected from decennial census respondents and decennial census personnel. These applications and systems process response data from census tests and Decennial Census operations and perform quality assurance mechanisms for various census operations.

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Applications and systems that collect, maintain, process, and/or disseminate PII include:

Control and Response Data System (CaRDS) - CaRDS provides sample design and Universe

determination for the Decennial Census.

Decennial Response Processing System (DRPS) - DRPS provides Auto-coding, Clerical coding, Data editing and imputation for the Decennial post data collection response processing. Additionally, it creates Decennial Response Format (DRF), Census Unedited File (CUF) and Census Edited File (CEF) files.

Decennial Budget Integration Tool (DBiT) – DBiT is used by the Decennial Budget Office (DBO) to perform ongoing cost estimation, budgeting, budget planning, and budget execution management functions required to prepare and execute the Census 2020.

Decennial Physical Access Control System (DPACS) Badging - DPACS Badging is an internal managed badging solution where all 2020 Census Enumerators and Census Field Supervisors (CFS) that are hired to work at Area Census Offices (ACOs) and at Regional Census Centers (RCCs) are issued, in a timely manner for 2020 field operations, a Census ID badge with the employee's photo and name printed on it, in conformance to a template provided by the Office of Security (OSY), for stateside (including Remote Alaska), DC, and Puerto Rico; and for the Census of Island Areas.

Disclosure Avoidance System (DAS) – DAS applies privacy controls to microdata in the data flow from the Census Edited File (CEF) to the Microdata Detail File (MDF). The privacy controls assure that there is no direct mapping between individual records in the CEF to individual records in the MDF.

Infrastructure Services – Infrastructure Services includes hardware and software used to manage and support 2020 Decennial applications and systems.

Intelligent Telecommunications Management System (ITMS) - ITMS provides asset tracking and reporting for mobile devices used for 2020 Decennial operations.

Network Infrastructure – Network Infrastructure includes hardware and software used to manage the connectivity and communication across 2020 Decennial applications and systems.

Sampling, Matching, Reviewing, and Coding System (SMaRCS) - SMaRCS supports quality control operations designed to determine whether field listers and enumerators are using validated procedures and collecting accurate data. SMaRCS facilitates quality control operations by providing a mechanism for selecting quality control samples, validating production interview data against administrative records sources, and by providing a tool for clerical matching to compare the production interview data against re-interview (RI) data.

SAS Foundation – SAS Foundation provides Sampling Criteria, Contact Strategies and Sample for re-interviews, manages the 2020 Experiments Program, and verifies the Sample Design File (SDF).

Production Environment for Administrative Records Staging, Integration and Storage (PEARSIS) – PEARSIS manages Administrative Records and services associated with these records. Services include preparing, storing, and distributing for Census production (PROD) operations.

Post-Enumeration Survey (PES) – PES includes the Processing and Control System (PCS) which performs automatic matching, workload control and sampling for Coverage Measurement, Imputation and Estimation System which performs the imputation and estimation for Coverage Measurement, and Clerical Match and Map Update (CMMU) which performs clerical matching activities and map spot updates for Coverage Measurement. The Coverage Measurement program provides estimates of net coverage error and components of census coverage for housing units and people in housing units.

Recruiting and Assessment (R&A) – R&A is an external system that is managed by Cornerstone On-Demand. R&A provides capabilities for applicant recruiting, learning management system (LMS) and the applicant pre-selection assessment process for temporary hires.

Self-Response Quality Assurance (SRQA) - The purpose of the Self-Response Quality Assurance (SRQA) operation is the identification of suspicious self-responses submitted during the 2020 Census. The SRQA operation contains automated and interactive analyses to identify suspicious individual or groups of self-responses. In addition, there is a field portion of the SRQA operation to assist in assuring the quality of self-responses. SRQA outcomes are reported to 2020 Census post-processing.

Third Party Fingerprinting (TPF) – The TPF solution is an external system managed by Indrasoft. The U.S. Census Bureau (USCB) employs hundreds of thousands of temporary workers to perform data collection activities via a non-competitive Schedule A hiring authority from the Office of Personnel Management (OPM) in support of the Decennial Census testing in Fiscal Year (FY) 2018 and 2020 Census. As part of the recruitment and security process, the USCB requires that these selectees undergo fingerprinting to determine their suitability for employment. In addition, temporary hires that provide services in support of the 2020 Decennial Census, such as Census Questionnaire Assistance (CQA), are fingerprinted. To support fingerprinting for the 2020 Census, the USCB uses the Third Party Fingerprinting solution to capture and transmit fingerprints to the Federal Bureau of Investigation (FBI) via USCB and conduct identity proofing for these temporary hires.

b) System location

CaRDS, DRPS, DBiT, DAS, Infrastructure Services, ITMS, Network Services, SMarCS, SAS Foundation and PEARSIS, PES, and SRQA are hosted and managed within the Bowie Computer Center (BCC) located in Bowie, Maryland and/or AWS GovCloud (US-East) and AWS GovCloud (US-West) Regions located in the Eastern and Northwestern parts of the United States.

DPACS Badging - Area Census Offices (ACOs) and Regional Census Centers (RCCs).

R&A - Unified Talent Management Suite (CUTMS) Cloud located in data centers within the United States.

Third Party Fingerprinting – AWS U.S. East/West located in US East (Ohio), US East (N. Virginia), US West (N. California), and US West (Oregon) and physical fingerprinting capture sites across 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)

CaRDS, DRPS, DBiT, DAS, DPACS Badging, Infrastructure Services, ITMS, Network Services, SMarCS, SAS Foundation, PEARSIS, PES, R&A and TPF and SRQA interconnects internally with systems within the Census Bureau which include Field Systems Major Application System Geospatial Services, Demographic Surveys, Census Data Lake (CDL) within the Enterprise Applications systems, Center for Enterprise Dissemination Services and Consumer Innovation (CEDSCI), Decennial Applicant, Personnel and Payroll Systems (DAPPS) with the Human Resources Applications, American Community Survey Systems, and Economic Programs, Associate Director for Economic Programs (ADEP).

d) The purpose that the system is designed to serve

Decennial's primary purpose is to support systems and applications used in surveys and census to collect data for statistical purposes.

Decennial also has applications/technologies used for human resource operations, which includes personnel management services for the 2020 Census.

e) The way the system operates to achieve the purpose

CaRDS, DRPS, DBiT, DAS, Infrastructure Services, ITMS, Network Services, SMarCS, SAS Foundation and PEARSIS, PES, and SRQA support the collection, monitoring, and processing response data from census tests and 2020 Census operations and perform quality assurance mechanisms for various census operations. Data collection is used to produce statistics.

DPACS Badging – DPACS Badging activities include badge creation and management system for field badges (CFS, Listers and Enumerators) for the 2020 Census field operations.

R&A - Temporary hires looking for employment for the 2020 Census submit their job applications through the R&A system. R&A securely delivers the submitted application data and associated attachments to DAPPS for processing and selecting.

Third Party Fingerprinting - To support fingerprinting for the 2020 Census, the USCB uses the Third Party Fingerprinting solution to capture and transmit fingerprints to the FBI via USCB and conduct identity proofing for selectees. These selectees provide their fingerprints at one of the Third Party Fingerprinting physical capture locations.

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

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USCB requires that these selectees undergo fingerprinting to determine their suitability for employment. In addition, temporary hires that provide services in support of the 2020 Decennial Census, such as Census Questionnaire Assistance (CQA), are fingerprinted. To support fingerprinting for Decennial Census Programs' activities, the USCB uses the Third Party Fingerprinting solution to capture and transmit fingerprints to the Federal Bureau of Investigation (FBI) via USCB and conduct identity proofing for these temporary hires.

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

Select U.S Census Bureau government employees and contractors sworn in as having a need to know.

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

Information in Decennial applications and systems are retrieved by using PII information identified that pertains to authorized users using internal web applications, secure databases, and managed file transfer servers.

Information contained within the applications and systems are not available to the public.

Only authorized Census Bureau federal employees and contractors with a need-to-know have access to the applications. These authorized users' interface with the information contained within the applications and systems using authorized internal web applications, file servers, and/or databases that are protected with a multi-layer security approach. This approach includes the deployment of internal technologies to safeguard data and ensure privacy as well as 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.

i) How information is transmitted to and from the system

Information is transmitted to and from CaRDS, DRPS, DBiT, DAS, DPACS Badging, Infrastructure Services, ITMS, Network Services, SMarCS, SAS Foundation, PEARSIS, PES, R&A and TPF and SRQA using either the Census Bureau Enterprise Service Bus (ESB) via the service oriented architecture (SOA) suite, application program interfaces (API) and/or secure point-to-point connections.

Applicants' fingerprints are captured on TPF physical sites which is uploaded to the authorized AWS U.S. East/West. Files are encrypted and transferred using the service-oriented architecture (SOA) via the Enterprise Service Bus (ESB), which then sends it over to CHEC within the U.S Census Bureau. The Enterprise Service Bus is a configuration based, policy-driven enterprise service bus. It provides highly scalable and reliable service-oriented integration, service management, and traditional message brokering across heterogeneous IT environments. It

combines intelligent message brokering with routing and transformation of messages, along with service monitoring and administration in a unified software product.

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.*

☐ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or 01-2017). *Continue to answer questions and complete certification.*

☒ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2019 or later). *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.

☒ 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.

R&A - Temporary hires looking to support the 2020 Census submit their job applications through the R&A system. Temporary hire social security numbers are collected as part of the employment application process per OPM. Census respondent social security numbers are not collected. No other applications or systems within Decennial collect the public's social security numbers. R&A also collects Alien Registration information as part of the job application process and direct deposit information as part of the on-boarding process.

☐ 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 I certify the criteria implied by one or more of the questions above **apply** to Decennial and as a consequence of this applicability, I will perform and document a PIA for this IT system.

 I certify the criteria implied by the questions above **do not apply** to the [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

<p>System Owner Name: Barbara LoPresti Office: Decennial Information Technology Division Phone: 301-763-7765 Email: barbara.m.lopresti@census.gov</p> <p>Signature: <u>Barbara LoPresti</u> Digitally signed by Barbara LoPresti Date signed: _____ Date: 2021.08.18 17:04:21 -04'00'</p>	<p>Chief Information Security Officer Name: Beau Houser Office: Office of the Chief Information Officer Phone: 301-763-1235 Email: beau.houser@census.gov</p> <p>Signature: <u>BEAU HOUSER</u> Digitally signed by BEAU HOUSER Date signed: _____ Date: 2021.08.24 14:24:44 -04'00'</p>
<p>Privacy Act Officer Name: Byron Crenshaw Office: Policy Coordination Office (PCO) Phone: (301) 763- 7997 Email: byron.crenshaw@census.gov</p> <p>Signature: <u>BYRON CRENSHAW</u> Digitally signed by BYRON CRENSHAW Date signed: _____ Date: 2021.09.17 16:20:25 -04'00'</p>	<p>Agency Authorizing Official Name: Luis J. Cano Office: Chief Information Office Phone: (301) 763-3968 Email: luis.j.cano@census.gov</p> <p>Signature: <u>LUIS CANO</u> Digitally signed by LUIS CANO Date signed: _____ Date: 2021.08.26 11:05:37 -04'00'</p>
<p>Bureau Privacy Officer Name: Byron Crenshaw Office: Policy Coordination Office (PCO) Phone: (301) 763- 7997 Email: byron.crenshaw@census.gov</p> <p>Signature: <u>BYRON CRENSHAW</u> Digitally signed by BYRON CRENSHAW Date signed: _____ Date: 2021.09.17 16:20:49 -04'00'</p>	<p>Business Authorizing Official Name: Albert E. Fontenot Office: Associate Director for Decennial Census Programs Phone: 301-763-4668 Email: albert.e.fontenot@census.gov</p> <p>Signature: <u>Deborah Stempowski</u> Deborah Stempowski Date signed: _____ 2021.08.26 12:42:40 -04'00'</p>