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

Privacy Threshold Analysis
for the
CEN15 Centurion

U.S. Department of Commerce Privacy Threshold Analysis

U.S. Census Bureau/ CEN15 Centurion

Unique Project Identifier: [Number]

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:*

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).

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

   Major application/web application

b) *System location*

   Bowie Computer Center (BCC)

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

   CEN15 interconnects with internal Census Bureau IT systems to leverage enterprise services (CEN01 Data Communications, CEN16 Network Services) and inherit security controls provided by the Enterprise Common Control Providers (ECCP) CEN15 also interconnects with the following internal Census Bureau systems: CEN03 Economic Census and Surveys and Special Processing, CEN05 Field, CEN07 Geography, CEN18 Enterprise Applications, CEN30 American Community Survey, and CEN36 Associate Director for Economic Programs (ADEP) Innovation Technology Office (ITO). In addition, CEN15 connects with an external system at the Bureau of Industry and Security.

d) The purpose that the system is designed to serve

The purpose of CEN15 Centurion is for statistical purpose and to improve federal online services.

e) The way the system operates to achieve the purpose

Centurion is a web-based application used for the design, delivery, and execution of surveys, censuses, and other data collection and data exchange efforts over the Internet. Centurion allows the Census Bureau to collect data more cost effectively and with a higher degree of accuracy as compared to equivalent traditional data collection methods. Standard web browser clients are used to access the Centurion IT system. Members of the public accessing Centurion are survey or census respondents; they authenticate to the IT system, enter response data through a series of interactive web forms, and submit survey responses.

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

Information collected via the Centurion IT system includes data covered by Title 13 and Title 26 collection authorities for demographic and economic surveys. Information collected via Centurion includes, but is not limited to, names, telephone numbers, email addresses, etc.

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

Information within Centurion is limited to a handful of authorized Special Sworn Status, Census Bureau, administrative users. Survey respondents also have access to their information only.

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

Information in CEN15 Centurion is retrievable by a personal identifier such as name, by authorized Centurion administrators.

i) How information is transmitted to and from the system

Information collected from survey respondents is provided back to the survey sponsors through Secure File Transfer Protocol (SFTP). Users submit survey information via applications using secure protocols such as HTTPS.

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 (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.

_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):			

_X_ 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.)."

_X_ 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."

_X_ 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
_X_ 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.

_X_ 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?

_X_ 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.

_X_ 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 CEN15 Centurion 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.

System Owner	Chief Information Security Officer
Name: David J. Peters Office: Application Development & Services Division Phone: (301) 763-9359 Email: david.j.peters@census.gov Signature: DAVID PETERS — Digitally signed by DAVID PETERS Date: 2021.01.25 08:43:57 -05'00' Date signed:	Name: Beau Houser Office: Office of Information Security Phone: (301) 763-1235 Email: beau.houser@census.gov Signature: BEAU HOUSER — Digitally signed by BEAU HOUSER Date: 2021.02.09 11:42:06 -05'00' Date signed:
Census Bureau Chief Information Officer	**Business Authorizing Official**
Name: Gregg D. Bailey Office: Associate Director of IT & CIO Phone: (301) 763-0989 Email: Gregg.d.bailey@census.gov Signature: GREGG BAILEY — Digitally signed by GREGG BAILEY Date: 2021.02.04 12:19:09 -05'00' Date signed:	Name: Office: N/A Phone: Email: Signature: N/A Date signed:
Census Bureau Privacy Officer	**Privacy Act Officer**
Name: Byron Crenshaw Office: Policy Coordination Office (PCO) Phone: (301) 763-7997 Email: byron.crenshaw@census.gov Signature: BYRON CRENSHAW — Digitally signed by BYRON CRENSHAW Date: 2021.02.22 11:52:33 -05'00' Date signed:	Name: Byron Crenshaw Office: Policy Coordination Office (PCO) Phone: (301) 763-7997 Email: byron.crenshaw@census.gov Signature: BYRON CRENSHAW — Digitally signed by BYRON CRENSHAW Date: 2021.02.22 11:52:53 -05'00' Date signed: