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

Privacy Threshold Analysis
for the
Center for Enterprise Dissemination (CED)
Integrated Research Environment (IRE)

U.S. Department of Commerce Privacy Threshold Analysis

Bureau of the Census, Center for Enterprise Dissemination (CED) Integrated Research Environment (IRE)

Unique Project Identifier: 006-000400700

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 Center for Enterprise Dissemination (CED) Integrated Research Environment (IRE) includes data maintained by the Census Bureau's Associate Director for Research and Methodology (ADRM). IRE covers the personally identifiable information (PII) and Business identifiable information (BII) from each of the research centers maintained by the system. The ADRM data holdings include census and survey data including PII and BII received from other Census Bureau IT systems identified in item c below, administrative records from other federal, state, and local agencies, and proprietary data files from commercial vendors and some non-profit organizations. To the maximum extent possible and consistent with the kind, timeliness, quality, and scope of the statistics required under Title 13 of the United States Code, the Census Bureau is required to obtain and use data from other agencies in lieu of direct inquiries through censuses or surveys. By reusing data that already exists elsewhere, and linking it to census and survey data, Census is able to conduct research that provides a more holistic view of the people present in, and the economy of, the United States. Information received from administrative records are protected from unauthorized disclosure under Title 13 U.S.C. The data in IRE is used for statistical purposes and for research and operations to improve record linkage methods for surveys, including the decennial census.

Address the following elements:

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

   The CED IRE is a general support system.

b) System location

Bowie, Maryland

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

IRE interconnects with the following Census Bureau systems:
- ADEP ITO: Associate Directorate for Economic Programs
- EAD: Economic Census and Surveys and Special Processing
- GEO: Geography
- DSD: Demographic Census, Surveys and Special Processing
- CAES: Concurrent Analysis and Estimation System
- PEARSIS: Production Environment for Administrative Record Staging, Integration and Storage
- DMS: Data Management System
- ACSO: American Community Survey
- ITMD: Foreign Trade Division Applications
- DSCMO-DSSD: Decennial
- UTS: Unified Tracking System
- IDMS: Identification Management System
- ERD: Economic Reimbursable Surveys Division

d) The purpose that the system is designed to serve

Research improvement/support of Census Bureau programs through use of administrative records and other non-survey data, quality assurance, and statistical purposes:
Record linkage using BII and Protected Identification Keys (PIKs) facilitates research to improve and support existing Census Bureau programs and creation of beta data products. These products use innovative techniques that leverage existing data and reduce the burden on respondents. This PII/BII covers members of the public, businesses, contractors, and federal employees.

e) The way the system operates to achieve the purpose

The CED IRE provides a research platform with high performance computing and standard statistical tools to conduct research to for improvement/support of Census Bureau Programs

through use of administrative records and other non-survey data, quality assurance, research, improvement/support of Census Bureau Programs and statistical purposes. The research platform interacts with ADRM Data Management System (DMS), the Identification Management System (IDMS) and the CED Management System (CMS) to make sure the research projects are approved and creates project space for the project on the research platform. The system provides access to project space only for the users that have been approved to work on the project. The project has access only to the data that it has received prior approval to use. Researchers execute their computational model on the research platform and write the outputs into their project space.

For internal Census staff users, DMS is used to perform management and tracking functions for research proposal and active projects. The DMS is used to track the status and activity of all projects from initial conception through completion and close out.

For external Federal Statistical Research Data Center (FSRDC) users, the CED CMS is used to perform management and tracking functions for research proposals and active projects. The CMS is used to track the status and activity of all projects from initial conception through completion and close out. Data is available only to researchers who have received prior approval.

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

CED IRE includes data maintained by the Census Bureau's ADRM. The IRE system maintains the PII and BII from each of the research centers maintained by the system. The ADRM data holdings include census and survey data including PII and BII received from other Census Bureau IT systems identified in item c below, administrative records from other federal, state, and local agencies, and proprietary data files from commercial vendors and some non-profit organizations. To the maximum extent possible and consistent with the kind, timeliness, quality, and scope of the statistics required under Title 13 of the United States Code, the Census Bureau is required obtain and use data from other agencies in lieu of direct inquiries through censuses or surveys. By reusing data that already exists elsewhere, and linking it to census and survey data, Census is able to conduct research that provides a more holistic view of the people present in, and the economy of, the United States. Information received from administrative records are protected from unauthorized disclosure under Title 13 U.S.C. The data in IRE is used for statistical purposes and for research and operations to improve record linkage methods for surveys, including the decennial census.

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

Government employees, contractors, and Special Sworn Status employees of the Census Bureau

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

The data files are stored on disk in various formats determined by the statistical software that they are to be processed with (statistical analysis system (SAS), Stata, R, etc.). Users use these statistical software packages to analyze the data. Data may also be stored in relational databases and retrieved through database queries. Retrieval of the data is performed only by authorized Census Bureau staff who have a need to know and are authorized through DMS.

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

Data is transmitted by Secure File Transfer Protocol (SFTP) and Linux based tool to synchronize files between systems.

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.*

__X__ 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): the collection of passport data is used to develop estimates of demographic characteristics of the population to include citizenship					

_____ 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. *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.

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

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify): the collection of passport data is used to develop estimates of demographic characteristics of the population to include citizenship			

_____ 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.)*

        __X__ DOC employees
        __X__ Contractors working on behalf of DOC
        __X__ 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___ The criteria implied by one or more of the questions above **apply** to the Center for Enterprise Dissemination (CED) Integrated Research Environment (IRE) 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 Center for Enterprise Dissemination (CED) Integrated Research Environment (IRE) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Information System Security Officer or System Owner Name: Robert Sienkiewicz Office: 5K141 Phone: 301-763-1234 Email: Robert.sienkiewicz@census.gov Signature: Robert T. Sienkiewicz Digitally signed by Robert T. Sienkiewicz Date: 2021.12.13 12:18:56 -05'00' Date signed: _____	**Information Technology Security Officer** Name: Beau Houser Office: 3K106 Phone: 301-763-1235 Email: beau.houser@census.gov Signature: BEAU HOUSER Digitally signed by BEAU HOUSER Date: 2021.12.14 16:31:14 -05'00' Date signed: _____
Privacy Act Officer Name: Byron Crenshaw Office: 8H021 Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: BYRON CRENSHAW Digitally signed by BYRON CRENSHAW Date: 2022.01.05 14:23:20 -05'00' Date signed: _____	**Authorizing Official** Name: Luis J. Cano Office: Chief Information Office Phone: (301) 763-3968 Email: luis.j.cano@census.gov Signature: LUIS CANO Digitally signed by LUIS CANO Date: 2021.12.16 11:09:13 -05'00' Date signed: _____
Bureau Chief Privacy Officer Name: Byron Crenshaw Office: 8H021 Phone: 301-763-7997 Email: Byron.crenshaw@census.gov Signature: BYRON CRENSHAW Digitally signed by BYRON CRENSHAW Date: 2022.01.05 14:23:47 -05'00' Date signed: _____	