U.S. Department of Commerce National Oceanic & Atmospheric Administration



Privacy Impact Assessment for the NOAA0100 NOAA Cyber Security Center (NCSC)

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U.S. Department of Commerce Privacy Impact Assessment NOAA/OCIO/NOAA Cyber Security Center

Unique Project Identifier: NOAA0100

Introduction: System Description

Provide a description of the system that addresses the following elements: The response must be written in plain language and be as comprehensive as necessary to describe the system.

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

The NOAA0100 Authorization Boundary consists of both a general support system and major applications.

(b) System location

NOAA0100 NCSC monitors NOAA security from four locations, Silver Spring, MD; Boulder, CO; Seattle, WA; and Fairmont, WV. All locations receive mirrored traffic of data feeds both incoming and outgoing for all NOAA internal offices. Silver Spring, MD; Boulder, CO; Seattle, WA; and Fairmont, WV receive two mirrored feeds.

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

NOAA0100 is an interconnected set of information resources under the same direct management control that shares common functionality. It includes all inventoried hardware, software and communication mediums utilized to support the NOAA0100 mission. As part of the service provided to the NOAA enterprise by the NOAA Common Controls for the Auditing (AU) and Incident Response (IR) security control families, NOAA0100 provides the following services: centralized log management via ArcSight Security Information and Event Management (SIEM), threat analysis methodologies via the FireEye Core Platform Suite (Endpoint Security (HX), Malware Analysis (AX), Email Threat Prevention (ETP), Network (NX), FireEye Central Management (CMS)); to include FireEye's Proprietary Integration and Automation Solution (IX) and security incident response via the NOAA Incident Response Reporting Application (NIRRA). This allows NOAA organizations to utilize the security monitoring services of the NOAA0100 Security Operations Center (SOC), which is made up of two functions; e.g. Security Operations and Intrusion Analysis. Security Operations provides long-term log retention, security monitoring and analysis by its staff. Intrusion Analysis implements and maintains the NOAA cyber IR capability by serving as a central clearing-house for all reported Information Technology (IT) security incidents, alerts, bulletins, and other security related material. The NCSC Enterprise Security Services (ESS) provides centralized vulnerability scanning via Tenable Security Center (Nessus) and the Web Application Assessment Tool (WAAT) / MicroFocus WebInspect and web content filtering via McAfee Web Gateway (MWG). Additionally, NOAA0100 provides Trusted Internet Connection (TIC) Access Provider (TICAP) in-band and out-of-band services at various

NOAA locations. These enterprise services are available to NOAA organizations following system onboarding completion and establishment of any necessary operational level agreements.

Additionally, NOAA0100 has established current terms and conditions via Interconnected Security Agreements (ISA's) between connecting DOC bureaus, which obtain Cyber Analytic (CA) services from ESOC within the Enterprise Support Service component. The external connections for which ISA's have been created are as follows: BAS, BEA, BIS, Census, ITA, NIST, NTIA, NTIS, OS and USPTO. The purpose of the interconnection is for the Customer to provide security events, logs, and alerts involving the Customer's information technology resources to the ESOC SIEM (Security Incident Event Management) system and the Log Aggregation Servers hosted within the Provider's infrastructure.

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

The sub-components of NOAA0100 NCSC are:

Trusted Internet Connection Access Point (TICAP)

NOAA0100 provides Trusted Internet Connection (TIC) Access Provider (TICAP) services grouped together in a physical TIC stack at each of the NOAA TICAP Locations. The physical TIC stack is comprised of the following:

- a) Web Content filtering
- b) Netflow
- c) Packet Capture
- d) Firewall Services
- e) Intrusion Detection Sensor
- f) Network System Information and Event Manager (SIEM) for logging, monitoring, and event correlation.
- g) Network Time Protocol (NTP) Stratum 1 system
- h) NCPS (Einstein 2)
- i) Malware analysis/detection Tools

System Administration Support (SAS): The SAS team works to ensure that the technologies supported by NOAA0100 are maintained. SAS ensures that all components, hardware and software, within the NOAA0100 are authorized, configured, and managed appropriately; to include patch management implementation activities via ECMO (BigFix), SCCM and RedHat Satellite.

Enterprise Support Services:

The Security Operations Center (SOC) is made up of two functions, Security Operations and Intrusion Analysis.

Security Operations, performed by Security Operators (SO): The SOC monitors, detects, responds to security events and works with Security Information and Event Management (SIEM) technology and an integrated workflow to identify events of interest hidden in mountains of log data to consistently improve security intelligence capabilities. SOC provides NOAA0100 with a complete picture of security incidents and the ability to make

informed security decisions. The SOC leverages existing NOAA0100 monitoring tools and intelligence to collect and accurately analyze logs produced by application, system or network devices coupled with SIEM content to detect possible incidents by employing security intelligence, workflow, repeatable processes and procedures. SOC team members work with NOAA to further understand the threat landscape, the associated risks to the organization, the ability to employ proper security controls and content to generate events of interest which are then triaged and analyzed.

• Intrusion Analysis, performed by Intrusion Analysts (IA) responds to suspected or verified information technology (IT) security incidents. This includes determining if an IT security incident has taken place; how the incident occurred; what the root cause of the incident is; and what is the scope of the incident. Once root cause and scope are determined, IA establishes what countermeasures are to be deployed to defend, contain, eradicate, and recover from the incident. During an IT security incident, the IA role is the authority overseeing and managing every phase of the incident response effort. IA focuses on maintaining and supporting the mission of the affected system(s) and recognizes when downtime tolerance is minimal or nonexistent. IA provides incident response (IR) for the affected site and works closely with the cooperation of System Owners and users. Cooperation between IA and customers is paramount to the development of a successful containment plan, effective corrective actions and eradication, and, if warranted, a holistic and effective recovery.

Enterprise Security Solutions (ESS): The ESS team works to engineer and manage a services oriented security architecture for NOAA and then integrating the architecture in a multi-layered approach. The ESS team members look at the NOAA enterprise environment to determine how to layer web content filtering; deploying, managing and running vulnerability scanner tools; i.e. Tenable Nessus Security Center. The ESS task of integrating enterprise services builds for NOAA a holistic security reporting and monitoring operations capability. TICAP is a functional component of ESS.

Enterprise Security Operations Center (ESOC): The DOC ESOC provides a comprehensive understanding of cybersecurity posture and threat activity across the Department. It provides Commerce executive leadership with a holistic understanding of cyber risk on a near real time basis and provides recommendations on both immediate and long-term actions which should be taken to reduce risk. It is also responsible for facilitation of cyber intelligence information sharing and coordination of threat monitoring across the Commerce and its OUs.

The ESOC is staffed on a 24x7 basis with personnel skilled in cyber intelligence analysts, network analysis, vulnerability management, and malicious code analysts. ESOC personnel utilize multiple tools such as Security Information and Event Management (SIEM) tools, distributed security analytics capabilities, Enterprise Governance Risk and Compliance (EGRC) tools and other similar technologies which centralize and prioritize security posture and threat information. ESOC has access to multiple levels of classified systems to ensure better collection and sharing of all levels of cyber threat intelligence.

The ESOC facilitates the collection and use of information about cyber threats and vulnerabilities, which could impact the cyber, risk posture of DOC systems. It prioritizes sharing of actionable

cyber intelligence with all appropriate network defenders and ensuring that cyber threat indicators are effectively managed and actioned within the DOC environment. ESOC utilizes the Commerce Automated Security Information System (CASIS), which provides an Incident Response solution capable of tracking and reporting IT security incidents of all types throughout the response life cycle.

Although the ESOC is concerned with any cyber-attacks against the DOC or its OUs, it places emphasis on targeted attacks that specifically seek to infiltrate Commerce systems to steal information, disrupt operations, compromise data integrity, or use the Department as a launching pad for other attacks. Threat monitoring efforts focus on detecting Indicators of Compromise (IOC), malicious code, and patterns of malicious activity at the Internet gateway level as this generally provides the best coverage for detection without interfering with ongoing mission critical systems at the OU level. Additionally, efficiency can be gained by launching sources for unique IOCs from a single source that covers internet traffic from multiple OUs. The ESOC does not have any view into encrypted traffic supporting either Commerce activities or employee's limited personal use of the Internet. The ESOC relies on collected information from Trusted Internet Connection Access Provider (TICAP), Managed Trusted Internet Protocol Service (MTIPS), Enterprise Cybersecurity Monitoring and Operations (ECMO), OU SOCs and other sources.

Furthermore, ESOC operational efforts are delineated into two distinct functional services; e.g. ESOC-CA and ESOC-IR.

ESOC-CA:

Cyber Analytics (CA) is responsible for integrating threat intelligence with 24x7 near real-time monitoring for timely detection of Cybersecurity incidents. Cyber Analytics has four (4) primary functions:

- Log Collection (establishing the logging environment from log source to centralized SIEM)
- Threat Intelligence Harvesting and Curation (applying fidelity, confidence, and relevance values to ingested intelligence)
- Enterprise Event Correlation (applying correlation logic against ingested security logs for analysis and investigation).
- Intelligence and Awareness Sharing (distributing cyber intelligence to the constituency through the intelligence portal)

ESOC-IR:

Incident Response (IR) plays a critical role in protecting sensitive information. Incident response has four (4) primary functions:

- Incident Handling—the process of collecting information from the reporting entity, such as a Reporting BOU (Bureau Operating Unit) or CA. This process identifies necessary and/or applicable information.
- Incident Processing—the process through which an incident is triaged and routed to the appropriate department.
- Incident Reporting—the process of reporting to external agencies, communicating applicable CCIRs (Commerce Critical Incident Report), and coordinating updates and closures.

• Incident Investigation—the process of malware analysis, data forensics, and additional dataset collection.

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

NOAA0100 utilizes a role-based approach within 'NCSC User Onboarding' Standard Operating Procedures to determine how to enforce approved authorizations for logical access within each inventoried device or application. NOAA0700 provides the ICAM solution for Identity Credential Access and Federation Management (ICAM), which is leveraged for multifactor and single signon capability. NOAA0100 obtains enterprise compliant authentication services for the NIRRA, CASIS and CTIP components, respectively, from this solution.

Other NOAA0100 component use different methods of multifactor authentication for privilege user access. For example, the application called freeRADIUS supports NOAA0100 networking equipment with username + token one time password (OTP) for privileged users to gain access to those devices. NCSC authentication requests are tied into the freeIPA management server where the usernames, groups, and role-based access are administered/established. The configurations setup on network devices allow authentication requests to be sent to this RADIUS solution. Administrative access to TIC access point devices and Security Information Event Management (SIEM) are controlled by two-factor authentication via Common Access Card (CAC) hardware based authentication.

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

A firewall at each NOAA0100 site enforces a strict access control policy (ACL) on data transmitted via egress and ingress within the network. NOAA0100 implements a defense-in-depth strategy via deploy of FortiNet Fortigate Firewalls with IDS configured, McAfee Web Gateways for http/web filtering. FireEye web Malware Protection System for Web Malware Inspection. Cisco StealthWatch for Network Intrusion Detection and Anomaly Detection. Additionally, there is regularly updated IPS/IDS built into the in-line Fortigate Firewalls of the TIC stack. It has numerous signatures for XSS, SQL injection, session tampering, buffer overflows, malicious web crawlers, and other web security vulnerabilities.

(g) Any information sharing conducted by the system

NOAA0100 utilizes the NOAA Incident Response Reporting Application (NIRRA) and Commerce Automated Security Information System (CASIS), which provides an Incident Response solution capable of tracking, reporting and sharing IT security incidents of all types throughout the response life cycle. This system provides a highly customizable automatic response tasking, permissions, content, reporting and metrics.

Additionally, NOAA0100 utilizes the Central Threat Intelligence Platform (CTIP), which provides centralized intelligence and threat intel/indicator information to DOC Bureaus.

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

The applicable authority for is civil employment, 5 U.S.C. 301.

The applicable authority for collection of PII as part of a breach investigation is the Privacy Act of 1974.

44 U.S.C. 3101; E.O. 12107, E.O. 13164, 41 U.S.C. 433(d); 5 U.S.C. 5379; 5 CFR Part 537; DAO 202-957; E.O. 12656; Federal Preparedness Circular (FPC) 65, July 26, 1999; DAO 210-110; Executive Order 12564; Public Law 100-71, dated July 11, 1987.

Executive Orders 10450, 11478, 12065, 5 U.S.C. 7531-332; 15 U.S.C. 1501 et. seq.; 28 U.S.C. 533-535; 44 U.S.C. 3101; and Equal Employment Act of 1972.

35 U.S.C. 2; the Electronic Signatures in Global and National Commerce Act, Public Law 106-229; 28 U.S.C. 533-535; 44 U.S.C. 1301; Homeland Security Presidential Directive 12 and IRS Publication-1075.

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

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Section 1: Status of the Information System

1.1 Indicate whether the informat	ion system is a new or existing	ing system.
This is a new information This is an existing inform (Check all that apply.)	system. ation system with changes th	nat create new privacy risks.
Changes That Create New Privacy Ris	ks (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 privac	y risks (specify):	
risks, and there is not a SA This is an existing information	AOP approved Privacy Impa	not create new privacy risks, and
	•	es do not create new privacy Assessment (version 01-2019 or

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.)

Ide	Identifying Numbers (IN)					
a.	Social Security*	X	f. Driver's License	X	j. Financial Account	X
b.	Taxpayer ID	X	g. Passport	X	k. Financial Transaction	X
С	Employer ID	X	h. Alien Registration	X	Vehicle Identifier	X
d.	Employee ID	X	i. Credit Card	X	m Medical Record	
e.	File/Case ID	X				

n. Other identifying numbers (specify):

All information transmitted on NOAA networks is subject to network monitoring tools, inspection, continuous monitoring operations, and collection as part of the NCSC mission, and may involve voluminous collections of sensitive PII, including SSNs. As part of a computer incident response inquiry, the NOAA0100 system may have PII data to include Social Security Numbers included in its investigation that may have been part of the original incident. For example, if an individual transmits a list of social security numbers in violation of NOAA PII policies,

^{*}Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:

this original list may be part of the investigation supporting artifacts. Additionally, if a disk image or file contains PII, the retention is pertinent to the collection of incident information from the affected system.

Ge	neral 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. Physical Characteristics	X	
f.	Race/Ethnicity	X	m. Education	X	t. Mother's Maiden Name	X	
g.	Citizenship	X	n. Religion	X			
u.							

a.	rk-Related Data (WRD) Occupation	X	e.	Work Email Address	X	i. Business Associates
٥.	Job Title	X	f.	Salary	X	j. Proprietary or Business Information
Э.	Work Address	X	g.	Work History	X	k. Procurement/contracting records
d.	Work Telephone Number	X	h.	Employment Performance Ratings or other Performance Information	X	

Di	Distinguishing Features/Biometrics (DFB)							
a.	Fingerprints	X	f.	Scars, Marks, Tattoos	X	k. Signatures X		
b.	Palm Prints	X	g.	Hair Color	X	1. Vascular Scans X		
c.	Voice/Audio Recording	X	h.	Eye Color	X	m. DNA Sample or Profile X		
d.	Video Recording	X	i.	Height	X	n. Retina/Iris Scans X		
e.	Photographs	X	j.	Weight	X	o. Dental Profile X		
p.	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	on/aud	it data (specify):				

Other Information (specify)			

Indicate sources of the PII/BII in the system. (Check all that apply.) 2.2

Directly from Individual about Whom the Information Pertains

In Person		Hard Copy: Mail/Fax		Online	X
Telephone	*X	Email			
Other (specify): *In interim for report of computer problem until access to online.					

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

Non-government Sources					
Public Organizations	X	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.

Data integrity is ensured in TICAP, NIRRA, CASIS and CTIP via the non-repudiated enforcement of least privilege access controls that provide users with the ability to view and/or modify information assigned to their respective roles / responsibilities.

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 (TUCPBNPD)				
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	Ī

Section 3: System Supported Activities

3.1 Indicate IT system supported activities which raise privacy risks/concerns. (*Check all that apply.*)

Activities				
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.*)

Purpose				
For a Computer Matching Program		For administering human resources programs		
For administrative matters		To promote information sharing initiatives		
For litigation	X	For criminal law enforcement activities	X	
For civil enforcement activities	X	For intelligence activities		
To improve Federal services online		For employee or customer satisfaction		
For web measurement and customization		For web measurement and customization		
technologies (single-session)		technologies (multi-session)		
Other (specify):				
(1 7/				

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).

NOAA0100 does not solicit, collect, maintain, or disseminate PII/BII; however, it is possible for individuals to voluntarily make such information available. PII/BII may become available to NOAA0100 as part of investigation of PII policy violations and criminal law enforcement. These may include names of individuals and businesses, images from photos or videos, screen names, email addresses, etc. Information that individuals voluntarily submit as part of the investigative process is entered as evidence for the NOAA Cyber Security Center [NOAA0100] (NCSC). The NCSC does not solicit this information. There is no purpose for this information, unless it is retained as part of a breach investigation.

PII/BII is collected and monitored via network monitoring tools for security threats, incident response, law enforcement activities, and network protection. This information may be in the system as evidence of a breach and retained as part of a breach investigation. The only purpose for this information is if it is retained as part of a breach investigation.

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.)

Common threats to the privacy of TICAP, NIRRA, CASIS and CTIP operational data include data leakage due to compromised chain of custody within the environments designated to store / process sensitive information. The continuously monitored and implemented control, leveraged to ensure data is handled, retained and disposed, relates to designated roles required to comply with DOC ITSBP Annex C-1; i.e., Incident Responders and ISSOs. Both roles have successfully met and maintained the credential / training requirement via qualified certifying organization and the associated Continuing Professional Education (CPE) programs, which sustain a working knowledge of industry standard and best practices.

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.)

Doginiont	How Information will be Shared				
Recipient	Case-by-Case	Bulk Transfer	Direct Access		
Within the bureau	X				
DOC bureaus	X				
Federal agencies	X				
State, local, tribal gov't agencies					
Public					
Private sector					
Foreign governments					
Foreign entities					
Other (specify):	X				

^{*}To Law Enforcement if needed.

6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

X	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before redissemination of PII/BII.
	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before redissemination of PII/BII.
	No, the bureau/operating unit does not share PII/BII with external agencies/entities.

The PII/BII in the system will not be shared.

6.3 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

	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:
X	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.)

X	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.			
	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:			
X	Yes, notice is provided by other means.	Specify how: For those reporting a breach, CASIS states: "This is a United States Federal Government computer system, which may be accessed and used only for official Government business by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil and/or administrative action. All information on this computer system may be intercepted, recorded, read, copied or disclosed by and to authorized personnel for official purposes, including criminal investigations. Access or use of this computer system by any person, whether authorized or unauthorized, CONSTITUTES CONSENT to these terms."		
	No, notice is not provided.	Specify why not:		

7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

X	Yes, individuals have an opportunity to	Specify how: An employee/contractor enters his/her credentials
	decline to provide PII/BII.	through CASIS and ICAM, which authenticates the user to allow
		access to the reporting system. An employee/contractor can
		decline to provide PII by not logging into the CASIS platform.
	No, individuals do not have an	Specify why not:
	opportunity to decline to provide	
	PII/BII.	

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

X		Specify how: Consent is granted prior to log-in. A warning notice includes "Access or use of this computer system by any person,
	PII/BII.	authorized or unauthorized, constitutes consent to these terms. If
		you do not agree, click on cancel to avoid continuing to the site."
	No, individuals do not have an	Specify why not:
	opportunity to consent to particular uses	
	of their PII/BII.	

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

X	Yes, individuals have an opportunity to	Specify how: A CASIS user can view all the information in the
	review/update PII/BII pertaining to	User Profile by selecting the drop down list next to their name in
	them.	the upper right hand corner and selecting User Profile. Users who
		would like change their general account information in CASIS,
		such as first name, last name or username would be required to
		send a request to ess@noaa.gov. Users have the ability to change
		non-general settings in their user profile such as email address,
		time zone and password.
	No, individuals do not have an	Specify why not:
	opportunity to review/update PII/BII	
	pertaining to them.	

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 administrators or investigators have access, which is logged.	

X	The information is secured in accordance with the Federal Information Security Modernization Act
	(FISMA) requirements.
	Provide date of most recent Assessment and Authorization (A&A): 12/7/2020
	☐ 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 4 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 (POA&M).
X	A security assessment report has been reviewed for the information system and it has been determined
	that there are no additional privacy risks.
X	Contractors that have access to the system are subject to information security provisions in their contracts
	required by DOC policy.
N/A	Contracts with customers establish DOC ownership rights over data including PII/BII.
N/A	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
	Other (specify):

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*).

Discretionary access controls are implemented throughout NOAA0100 for access to forensic data. The CASIS and NIRRA platform provides an Incident Response solution capable of tracking and reporting IT security incidents of all types throughout the response life cycle. This system provides a highly customizable response tasking, record permissions, content uploading, reporting and querying for metrics.

Any sensitive PII on NIRRA and CASIS are redacted from end user views, and copies maintained on the database are only shared for law enforcement activities. The TICAP infrastructure processes sensitive PII on port mirror of egress/ingress traffic to conduct security analysis of systems; to include inline Firewall and Web Gateway services. The storage of any sensitive PII is encrypted in transit and at rest. NCSC Network Monitoring may pick up sensitive PII and privileged users who sign a confidentiality or non-disclosure agreement only conduct monitoring. Access to physical enclaves is implemented as a physical security control to NOAA0100 resources; this would include access to physical articles in evidence that may include PII/BII.

Section 9: Privacy Act

9.1	Is the PII/BII searchable by a personal identifier (e.g., name or Social Security number	r)?
	X 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	~

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."

X	X Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name,	
	number, and link. (list all that apply):	
	COMMERCE/DEPT-13, Investigative and Security Records;	
	COMMERCE/DEPT-18, Employees Information Not Covered by Notices of Other Agencies;	
	COMMERCE/DEPT-25, Access Control and Identity Management System;	
	OPM-Gov't 3, Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions,	
	and Termination of Probationers	
	Yes, a SORN has been submitted to the Department for approval on (date).	
	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	X There is an approved record control schedule. Provide the name of the record control schedule: NARA General Records Schedule 3.2, Item 20: Comput security incident handling, reporting and follow-up records.: Destroy 3 year(s) after all necessary follow-up actions have been completed, but longer retention is authorized if required for business use. (DAA-GRS2013-0006-0002)	
	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.)

Disposal			
Shredding	X	Overwriting	X
Degaussing	X	Deleting	X
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: With the information, available, large volumes
		of individuals may be identified.
X	Quantity of PII	Provide explanation: The quantity of PII will vary, but depending on
		the number and size of breaches, disclosure could have a serious
		adverse effect on the organization or on individuals.
X	Data Field Sensitivity	Provide explanation: There may be large volumes of sensitive PII in
		the system, because of both continuous monitoring, and voluntary
		sensitive PII submissions retained for law enforcement purposes.
X	Context of Use	Provide explanation: Voluminous Sensitive PII, including SSNs
		may be retained for law enforcement purposes, collected through
		Network Monitoring Tools as well as voluntary submissions of
		Sensitive PII incident to the submission of NIRRA ticket.
	Obligation to Protect Confidentiality	Provide explanation: N/A
X	Access to and Location of PII	Provide explanation: Access to the Sensitive PII through NCSC
		Network Monitoring is restricted to privileged users who have
		signed a non-disclosure agreement.
	Other:	Provide explanation:

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.)

All information transmitted on NOAA networks is subject to network monitoring tools, inspection, continuous monitoring operations, and collection as part of the NCSC mission, and may involve voluminous collections of sensitive PII, including SSNs. As part of a computer incident response inquiry, the NOAA0100 system may have PII data to include Social Security Numbers included in its investigation that may have been part of the original incident. For example, if an individual transmits a list of social security numbers in violation of NOAA PII policies, this original list may be part of the investigation supporting artifacts. Additionally, if a disk image or file contains PII, the retention is pertinent to the collection of incident information from the affected system.

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.