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



Privacy Threshold Analysis for the NOAA4000

Fisheries WAN and Enterprise Services

U.S. Department of Commerce Privacy Threshold Analysis

NOAA/NMFS/Fisheries WAN and Enterprise Services

Unique Project Identifier: NOAA4000

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 NMFS Headquarters WAN and Enterprise Services System (NOAA4000) is a General Support System (GSS); it comprises three cloud subsystems- Oracle Cloud Infrastructure (OCI), Google Cloud Platform (GCP), and the Appian Cloud Platform. The system hosts several applications that collect, store and/or disseminate information, on members of the public, including foreign national guests, and in some cases, NOAA staff and/or contractors. N0AA4000 has ingested the former NOAA4020 Science and Technology subsystem and all of its applications. Being that NOAA4000 is a GSS system, the ingestion did not change or introduce any new support that NOAA4000 already provides.

Address the following elements:

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

The NMFS Headquarters WAN and Enterprise Services System (NOAA4000) is a General Support System (GSS); it comprises three cloud platform subsystems- Oracle Cloud Infrastructure (OCI), Google Cloud Platform (GCP), and the Appian Cloud Platform. The system hosts several applications that collect, store and/or disseminate information, on members of the public, includingforeign national guests, and in some cases, NOAA staff and/or contractors.

b) System location

This system has two geographical locations: Ashburn, VA, and Data Center in Seattle Washington.

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

The NMFS WAN NOAA4000 connects to the Seattle DR site via NWAVE NOAA0550 and has

interconnections with the following entities:

- 1. US Coast Guard
- 2. Pacific States Marine Fisheries Commission
- 3. US Custom and Border Protection
- 4. Atlantic Coastal Fisheries Information Network (ACFIN)
- 5. Information Technology Center (ITC NOAA1101)
- 6. 1901 NSOC
- 7. Department of Justice (DOJ)
- 8. Naval Research Lab MDA
- 9. Other NOAA NMFS Systems:
 - a. NOAA4011 (NFPLRS)
 - b. NOAA4100 (GARFO)
 - c. NOAA4200 (NEFSC)
 - d. NOAA4300 (SERO)
 - e. NOAA4400 (SEFSC)
 - f. NOAA4500 (WCR)
 - g. NOAA4600 (NWFSC)
 - h. NOAA4700 (AKRO)
 - i. NOAA4800 (AKFSC)
 - j. NOAA4920 (PIRO)
 - k. NOAA4930 (SWFSC)
 - 1. NOAA4960 (PIFSC)

The interconnections between NOAA4000 and the entities listed above are established through encrypted interfaces (VPN) or the Verizon MPLS (which is internal NMFS). Authentication methods are in place to validate authorized users. Virus and malicious code prevention is employed toprotect the integrity of the software and the data.

d) The purpose that the system is designed to serve

NOAA4000 provides the necessary Infrastructure, Data Center colocation, and Application Supportservices that are instrumental to obtaining the objectives of the NMFS and its mission.

NOAA4000 GSS includes hardware, software, information, data, applications, communications, facilities, and people. NOAA4000 provides IT support by providing IT Infrastructure for Fisheries applications, providing enterprise security services, network connectivity (WAN/LAN), enterprise resource access (local/remote), database management, and enterprise IT helpdesk support.

IT Infrastructure consists of the hardware and software used within the environment to support the NMFS mission. The IT Services component provides technology services to the NMFS organization and NMFS applications supported by the IT infrastructure. Below are the services NOAA4000 provides:

IT Infrastructure:

Hardware

End-user systems (Desktops/Laptops, Printers, Mobile devices, Desk phones) Administrative Systems (Appliances, Servers, Networking devices, Storage)

Software

Operating Systems (Desktop, Mobile, Server, Network) Applications (Utilities, Tools, Productivity, Database) Telecommunications (Includes Voice, Data, and VTC Circuits)

- IT Services: Local Area Networking (LAN) Wide Area Networking (WAN) VoIP File Shares/Print Service Helpdesk Internet Connectivity Application Hosting and Development Enterprise Active Directory Enterprise Storage VPN Web Services IT Security Service Database Management
- *e)* The way the system operates to achieve the purpose

NOAA4000 provides IT support by providing IT Infrastructure for Fisheries applications, providing enterprise security services, network connectivity (WAN/LAN), enterprise resource access (local/remote), database management, and enterprise IT helpdesk support. The NMFS WAN services are through N-WAVE.

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

SISP - The Seafood Inspection Services Portal is a web-based application that captures information pertaining to the scheduling, tracking, and fee collections for seafood inspection activities. The SISP allows Seafood Inspection Program participants (Seafood Companies, Seafood Inspection Personnel, System Administrative Staff, NOAA Finance (Billing Data)) to create an account, to update company information including multiple locations, to request certificates, inspections and contracts, and to review and pay invoices. We collect the information under the authority of the **Agriculture and Marketing Act of 1946 and Fish & Wildlife Act of 1956**. Name, work email address, work address, and financial transaction are collected. We share the information with the private sector for invoicing and bill payment. **This application collects PII and BII**

EDMS – The Electronic Document Management System is a Web-based content management application that serves as a secure repository to archive various artifacts throughout their development life cycle. Authorized NMFS users (employees and contractors) can easily query this content management database, which has improved workflow. This application is a central resourcefor Habitat Division supervisors and staff for ongoing performance appraisal activity used to assist in completing required personnel related forms that contain names, job descriptions, and GS level. EDMS also contains various legal documents/case files that may include SSN/Tax ID numbers. Information in EDMS is housed behind the network firewall. The collection of such information is authorized by 5 U.S.C. 1302. This application collects PII and BII. EDMS has been decommissioned; however, residual data is still stored within NOAA4000 boundaries.

VMS - The National Vessel Monitoring System program provides near-real time fishing vessel monitoring, control and surveillance throughout the U.S. Exclusive Economic Zone (EEZ).

Continuous 24/7/365 monitoring supports compliance with marine and fishing regulations regarding open and closed seasons, closed areas, international boundaries and obligations, and overfishing. The onboard-enhanced mobile transceiver units (EMTUs) send position location information to NMFS, which is stored in a database and displayed on an electronic surveillance software, which iscurrently vTrack. The information obtained through VMS is evidentiary in nature and used to prosecute violations of fishery regulations in administrative and civil proceedings. The overall authority for federal fishery management is the **Magnuson-Stevens Conservation and Management Act (16 U.S. Code 1801 et. Seq.)**. Names, home telephone numbers, home email addresses and addresses for vessel operators are collected. Fisheries share the information with the U.S. Coast Guard, many coastal states' marine enforcement offices, the Navy, Immigration andCustoms Enforcement, NMFS science centers, and NMFS fishery managers. **This application collects BII.**

TRIDENT - is a cloud based, case management system which allows sworn law enforcement officers, special agents, and other staff seamless electronic collaboration with internal team members and external partners, and the development of case documentation by providing the abilityto view/share incident data that documents enforcement activities such as patrols, investigations, compliance assistance and education and outreach.

The information is used to document and track patrols, investigations and other enforcement activities in which U.S. laws and regulations as well as violations of international agreements. Enforcement personnel develop domestic and international investigative case files that support prosecuting alleged violations; data and information from these files and data collected refers to businesses and members of the public. This information is collected under the authority of theMagnuson-Stevens Fishery Conservation and Management Act (16 U.S. Code 1801 et. Seq.) and other laws under the purview of NOAA.

The Trident solution is a FedRAMP platform as a service (PaaS), private cloud, web accessible development environment, enabling the use of MicroPact's infrastructure and middleware services. The system is integrated with the NOAA Office General Counsel system Justware. **This application collects PII and BII.**

NRDA - The Natural Resources Damage Assessment Database collects information about restoration projects suggested by the public in response to an incident, such as an oil spill. The public (which could include companies or other business entities) submits all restoration activity information. Statutes authorizing programs to cover collections of information from the public in the form of contact information for receipt of data generated by programs, e.g. 15 U.S.C. 1151, "to make the results of technological research and development more readily available to industry and business, and to the general public." Along with project information, the database collects individual contact information (name, organization, work email address, home address, and home phone number). Personal information is used internally and not disseminated. Organizational names are publicly accessible as the submitting organization or as project partners, or along with research information. This application collects PII.

RCDB - The Restoration and Conservation Database collects information related to fisheries habitat restoration projects implemented by the NOAA Office of Habitat Conservation. The Restoration Center often works with private companies and members of the public to implement projects and

collects but does not disseminate contact information for individuals who have worked on the projects. Contact information includes name, work phone number, work email address, work address and organization name. An authorizing statute is **15 U.S.C. 1151**. Company names can be disseminated publicly and listed as "project partners" or "funding recipients" depending on their relationship to the project. Research information is also available to the public. **This applicationcollects PII**.

eAOP - Electronic Annual Operating Plan application provides NMFS managers and employees with the ability to plan, monitor, and report on organizational and Program information. This includes planning and reporting of milestones and performance measures, arraying milestones by key subject areas, and assisting Programs managers and staff in producing Program Annual Operating Plans. Contact names and phone numbers PII (contact information) are included in the milestone and performance measure information. Only NMFS employees with password access, granted by the Database Administrator, may retrieve information from the system. The organizationuses the information internally for assembling annual operating plans and for reporting strategic progress to NOAA and the Department of Commerce. **This application collects PII**.

NPS - National Permits System accept and maintain all Sustainable Fisheries permit applications and related data. Some of the West Coast and Pacific Islands Regions permits information is housedin NPS, as well as Antarctic Marine Living Resources and High Seas permits; the rest is in other NMFS FISMA systems and is addressed in their PIAs. Authorities that apply to this application and its data are:

The Magnuson-Stevens Fishery Conservation and Management Act (16 USC 1801 et seq.) The High Seas Fishing Compliance Act The Tuna Conventions Act of 1950 The Antarctic Marine Living Resources Convention Act The Western and Central Pacific Fisheries Convention Implementation Act (WCPFCIA; 16 U.S.C. 6901 et seq) The Marine Mammal Protection Act The Endangered Species Act and the Fur Seal Act The authority for the mandatory collection of the Tax Identification Number is 31 U.S.C. 7701 This application collects PII and BII.

eDiscovery Application system is a web-based application used to simplify agency response to Freedom of Information Act (FOIA) requests, and aid in the processing Administrative Records (AR), and to a lesser extent, Congressional Inquiries and Legal Holds. The system serves as a single point for the collection, review, tagging, redaction and export of responsive records. NMFS offices share the information in order to coordinate monitoring and management of sustainability of fisheries and protected resources, as well as with the applicable State or Regional Marine Fisheries Commissions and International Organizations. Sources of information include the permit applicant/holder, other NMFS offices, the U.S. Coast Guard, and State or Regional Marine FisheriesCommissions. **This application collects PII and BII.**

TIPS - Traceability Information Program for Seafood is a public facing, web based application. The TIPS application is used to establish registration, reporting and recordkeeping requirements for U.S. aquaculture producers of shrimp and abalone, two species subject to the Seafood Traceability Program, also known as the Seafood Import Monitoring Program (SIMP). Owners or operators of U.S. inland, coastal and marine commercial aquaculture facilities ("producers") will be required to report information about production and entry into U.S. commerce of shrimp and abalone products.

In addition, producers will be required to register with NMFS and retain records pertaining to the production of shrimp and abalone and entry of those products into U.S. commerce. This program serves as a domestic counterpart to the shrimp and abalone import requirements under SIMP. It also assists NMFS in verifying U.S. aquaculture shrimp and abalone were lawfully produced by providing information to trace each production event(s) to entry of the fish or fish products into U.S. commerce. **This application collects PII and BII.**

ECO - Environmental Consultation Organizer is a web-based, case management application on Appian PaaS using AWS to support NMFS consultations under the Endangered Species Act (ESA) and under the Magnuson-Stevens Fishery Conservation and Management Act sections 305(b)(2) & 305(b)(4) Essential Fish Habitat (EFH). This is the database for documenting and tracking consultation status and key internal process requirements throughout the consultation including quality assurance review and status in meeting statutory timelines. ECO collects project lead's name and business telephone number. Some fields are for internal use while some fields are available to the public through the public interface on the application. This application collects PII.

FSD Loans - Financial Services Division collects information from applicants for the following programs and purposes: The Fisheries Finance Program (FFP), credit information, personal identification including social security number, and tax returns. The information collected verify applicants for fisheries loans. Capital Construction Fund (CCF), personal identification including social security numbers and tax returns. The information collected verifies applicants for CCF accounts and projects. Fishermen's Contingency Fund (FCF), personal identification including social security numbers, and personal transaction information. The information is used to verify business losses and lost fishing gear for claims made by the fishermen. Information collected includes: Tax returns; Applicant's name and address; The amount of financing applied for; The purpose of loans; An appraisal of the vessel or facility involved; Financial information including the last three tax returns (these are not stored electronically); A list of creditors and buyers with relevant credit terms; Identification of authorized representatives (accountant, attorney, insurance agent); Legal history (status regarding bankruptcy, litigation, delinquency on and Federal debt, etc.). Annual financial statements are required of all borrowers. These statements update the financial statement information presented with the original application. The financial statements are used to monitor the borrower's financial condition and to trigger servicing actions if indicated. Loan applications are entered into the system from paper forms completed by the public, into an online application, which is managed by NMFS NOAA4000. Regional offices access the information in order to administer loans for applicants. The loan data is stored only in NOAA4000. This application collects PII and BII.

UAS - Unmanned Aircraft System is a standalone system used for civil and criminal enforcement activities and fisheries intelligence. The UAS collects pictures and videos of vehicles, vehicle tags, vessels vessel IDs and persons. The information in the system will be retrieved either by live feed to an external hard drive, directly to the computer, or to a flash drive. A camera is mounted on the unmanned aerial system, which broadcasts the information to the person(s) on the ground. Some UAS use radio signals to transmit and receive the information. Some UAS have a multi-band wireless transmitter built in along with an antenna. Depending on the UAS, the receiver of the information signals can be either the remote control unit, a computer, tablet or smartphone device. Some UAS use 4G / LTE networks to transmit the information. This consists of a camera module, a data module and a 4G / LTE modem. The only information sharing conducted by the system will be with state and federal partners such as the US Coast Guard and JEA partners. We collect information under the authority of Presidential Memorandum: Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems (Feb. 15, 2015). **This system collects PII/BII.**

GCLD - General Counsel Litigation Database - This is an application to assist NOAA's legal counsel manage and respond to various inquiries on NMFS/NOAA litigation from Congress, the White House, Fisheries councils, government agencies. **PII/BII is not collected.**

MMHSRP - Marine Mammal Health and Stranding Response Program The Marine Mammal Health and Stranding Response Program system is a centralized database that is accessible via a restricted web that collects and disseminate reference (Level A) data (i.e, genus, species, common name, etc.) on stranded marine mammals and tracks the animal's rehabilitation disposition when deemed nonreleasable. The system is for the purpose of scientific research. Our users are federal agencies, their non-federal partners, private organizations (i.e., aquariums), researchers, and educational institutions. **PII/BII is not collected.**

FWS - NMFS Federal Web Site - The National Marine Fisheries Service Federal Web Service (NMFS FWS) is a public facing responsive web service implemented with a Drupal 8 instance provisioned on an Acquia Drupal PaaS multi-tier medium environment fronted by Akamai Kona Site Defender web application firewall (WAF) and Akamai Content Delivery Network edge caching services. This consolidation improves information architecture, web content, and search functions, as well as providing a responsive design to accommodate increasing number of customers using mobile devices. **PII/BII is not collected.**

NATS – The NMFS Agreement Tracking System (NATS) has been created to reduce the time and effort required to approve agreements by NMFS Financial Management Centers (FMCs) and Budget Execution Division (BEX) personnel. Additionally, NATS intends to reduce the amount of physical folders and paperwork that need to be printed for routing and approval. **This application collects BII.**

GSDS The primary purpose of the NMFS' Global Seafood Data System (GSDS) is to fulfill congressional directives to curtail the United States import and consumption of fisheries products that are a product of Illegal, Unreported and Unregulated (IUU) fishing. Information derived from this system will be used to direct NMFS personnel in the monitoring, management and enforcement of fisheries imports. The SeafoodImport Monitoring Program (SIMP), will be the first of four NMFS trade monitoring programs that GSDS will focus on.

GSDS will utilize data analytics, machine learning, and artificial intelligence to process fisheries trade data from various sources to structure data and create reports. This information will be utilized to establish a more comprehensive approach to counter the flow of IUU fishing products into the U.S. It will help NMFSto establish management measures, within the scope of other U.S. fisheries trade management roles, to provide a well-informed awareness and understanding in support of the initiative to assure legitimate trade and combat IUU fishing

ITDS - ST6 International Trade Data System is used to support a number of NMFS offices/programs to monitor imports of fisheries products. Types of BII data collected are name of business, address, contact information, and product information. The data is collected by U.S. Customs and Border Protection (CBP) and provided to NMFS via SFTP for inclusion in the ITDS database. Reasons for the NMFS database:

(1) The ITDS is an inter-agency, distributed system that allows businesses to submittrade data to a single agency (CBP). CBP then makes these data available to participating ITDS agencies via secure, system integration.

(2) The NMFS component of the ITDS is an import monitoring system designed toimprove the efficiency and accuracy of NMFS trade monitoring programs by utilizing the data and services provided by CBP via the national ITDS architecture. NMFS trade monitoring programs supported by the NMFS ITDS include the Antarctic Marine Living Resources (AMLR) program, the Highly Migratory Species (HMS) program, the Seafood Import Monitoring Program (SIMP), and the Tuna Tracking Verification Program (TTVP). The NMFS ITDS is also integrated with the NMFS National Permit System (NPS) to provide international trade permit data to NMFS trade monitoring programs and to CBP.

MRIP -The Marine Recreational Information Program – The Extract, Transform and Load (ETL) system is a tool to collect and process recreational saltwater fishing license andregistration data from the Atlantic and Gulf of Mexico coastal states. This Data is inputted in the National Saltwater Angler Registry (NSAR).Types of PII collected include fishinglicense information, name, address, driver's license number, phone, email, and date of birth.

NSAR - The National Saltwater Angler Registry system serves as a consolidated phone book of the nation's recreational saltwater anglers. NSAR data is used to furnish frames for the MRIP surveys. Types of PII collected include fishing license information, name, address, driver's license number, phone, email, and date of birth.

NFCSS - The NOAA Fisheries Committee on Scientific Stature is a national-level performance Management Advisory Committee (PMAC) established to review the contributions, impact and stature of NOAA Fisheries Band IV and V non-supervisory research scientists. The NFCSS evaluates scientists whose primary responsibility is to conduct research and develop scientific products for resource management advice, other scientific advice, publications, and reports that represent new or more comprehensive understanding of a subject. The NFCSS members are Band V scientists, who are subject matter experts, from the regional science centers appointed to three-year terms by the respective regional Science Director. There is a website and database to manage and record the results of NFCSS member reviews conducted for the purpose of evaluating a scientist's credentials and contributions to allow them to be assigned to a higher pay Band without being a supervisor and to produce a standard report for the committee chair (OST Science Director). In 2014, OST upgraded the NFCSS website and database to enable password protected, role-based secure storage and retrieval of review package documents.

Access to the database is restricted to the OST Science Director, the six regional Deputy Science Directors, one Band V research scientist from each regional science center, the NOAA Fisheries HR Business Partner, and the NFCSS database administrator and is provided by the NFCSS database administrator only at the request of the NFCSS Chair. Information collected name, work contact information, letters of reference and curricula vitae, performance plan, science director memoranda and name of immediate supervisor. The administrator uploads copies of a memorandum from the NFCSS Chair to the Science Center director of staff being reviewed. The data (name, email, documents) for staff being reviewed are entered by their Deputy Science Director. The review comments are entered by the NFCSS members.

Protected Resources National Inventory of Marine Mammals (NIMM) System - The National Inventory of Marine Mammals (NIMM) system maintains current and past data (it replaces previous inventory databases maintained by NMFS since the 1970s) on marine mammals under NMFS' jurisdiction (dolphins, porpoises, whales, seals, and sea lions) held in permanent captivity for public display. In addition, NIMM includes information on marine mammals held in permanent captivity for scientific research, enhancement, and national defense purposes. NIMM includes beached/stranded marine mammals only if they have been deemed non-releasable and cannot be returned to the wild. NIMM allows marine mammal Owners and Facilities to enter inventory data directly into the online system. NIMM will eventually provide the public with real-time access to the national inventory. Types of BII collected include institution name, address, email, phone, and fax.

NOAA Emergency Contact List - The Emergency Contact List stores store contact information for ST staff and staffemergency contacts to be used in case of emergency. This is PII data.

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

Authorized federal employees and contractors with a need-to-know. NOA4000 also has public accessible data that is accessed by the public via the internet but does not contain PII or BII nor do they have access to network resources. NOA4000 also provides non-sensitive PII and BII to other state and federal agencies for law enforcement purposes. Also, NOA4000 provides fishery information that does not include PII or BII to private organizations, researchers and educational institutions.

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

There are two primary ways users can retrieve information from NOAA4000. They have to be locally connected to the NOAA4000 network or via remote access through NMFS VPN, which is within the FISMA boundary of NOAA4000. Based on the application or support being offered; data can also be accessed via general internet.

i) How information is transmitted to and from the system

NOAA4000 information is transmitted via Virtual Private Networks (VPNs), Internet, and dedicated network connections that makeup NMFS Verizon MPLS (WAN) network.

For GCP, all information is coming through the TIC externally to NWave and then to GCP through a partner interconnect. The partner interconnect is controlled through a single Google Project, this networking project is managed by the NMFS networking team. Those networking connections are then provided to the different partners within NMFS. Firewalls are managed through the same network connectiondescribed above. The default firewall configuration is to deny all, and allow through exception.

Firewall configurations are managed only by the networking team. Any communication ports that go through the firewall have to be opened by the firewall team, through an internal approval process.

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	Х	g. New Interagency Uses			
b. Anonymous to Non- Anonymous	e. New Public Access		h. Internal Flow or Collection	Х		
c. Significant System Management Changes	f. Commercial Sources		i. Alteration in Character of Data			
 j. Other changes that create new privacy risks (specify): Applications previously contained within the NOAA4020 boundary were migrated to NOAA4000. 						

_____ 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.

Х	Yes.	(Check all	that apply.)
---	------	------------	--------------

		Building entry readers Electronic purchase transactions present for area safety surveillance.		
Other (specify): *UAS use by law		Å		
	enfo	preement for area safety surveillance.		
Other (specify): *UAS use by law enforcement for area safety surveillance, detection, & avoidance while inspecting & marking remote crime scene areas; crime scene reporting; will follow the NOAA Unmanned Aircraft Systems policy in regard to PII and BII collection.				

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?
 - X 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.

• EDMS data contains some legal documents, which may include SSN.

• NPS - Tax Identification Number is required on all permit applications other than research or exemptedfishing permits, under the authority of 31 U.S.C. 7701. For purposes of administering the various NMFSfisheries permit and registration programs. A person shall be considered to be doing business with aFederal agency including, but not limited to, if the person is an applicant for, or recipient of, a federallicense, permit, right-of way, grant, or benefit payment administered by the agency or insuranceadministered by the agency pursuant to subsection (c) (2) (B) of this statute.

VMS and Trident collects Vessel ID Numbers, Permits for Federal or State permit/licenses issued and start and end dates and other permit

• SISP/FDS Loan collects credit, personal and SSN information for verification of financial information todetermine qualifications for Fisheries Loans, Capital Construction Fund accounts and other projects.

• NATS collects budget information, business information, and all supporting documents needed to approve an agreement package.

Provide the legal authority, which permits the collection of SSNs, including truncated form. The Marine Mammal Protection Act, 16 U.S.C. 1361 et seq.; the Fur Seal Act, 16 U.S.C. 1151 et seq.; and the Endangered Species Act, 16 U.S.C. 1531 et seq. [For collection of theTax Identifying Number (Employer Identification Number or Social Security Number), 31 U.S.C. 7701.]

____ 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.

- X 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

 \underline{X} The criteria implied by one or more of the questions above **apply** to the NOAA4000 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 NOAAXXXX and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Information System Security Officer or	Information Technology Security Officer
System Owner	
Name: Doug Brackett	Name: Catherine Amores
Office: 3609	Office: 3432
Phone: 301-427-8815	Phone: 301-427-8871
Email: Doug.Brackett@noaa.gov	Email: Catherine.Amores@noaa.gov
Signature: Digitally signed by BRACKETT.DOUGLAS.HOWE.1365 B99564 Date: 2022.04.18 12:06:17 -04'00' Date signed: April 18, 2022	AMORES.CATHERINE.S Digitally signed by AMORES.CATHERINE.S AMORES.CATHERINE.SOLEDAD.15413 14390 Date: 2022.04.20 12:10:06-04'00' Date signed:
Privacy Act Officer	Authorizing Official
Name: Robin Burress Office: NOAA OCIO Phone: 828-271-4695 Email: Robin.Burress@noaa.gov BURRESS.ROBI Signature:	Name: Nancy Majower Office: 3853 Phone: 301-427-8811 Email: Nancy.Majower@noaa.gov Signature:
Bureau Chief Privacy Officer Name: Mark Graff Office: NOAA OCIO Phone: 301-628-5658 Email: Mark.Graff@noaa.gov GRAFF.MAR Digitally signed by GRAFF.MAR Digitally signed by GRAFF.MARK.HYRU Signature: K.HYRUM.1 M.1514447892 Date signed: 514447892 Date: 2022.05.02 17:25:03 -04'00'	