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U.S. Department of Commerce
National Telecommunications and Information Administration (NTIA)

Privacy Threshold Analysis for the
Major Application EL-CID Online (Green) NTIA038

U.S. Department of Commerce Privacy Threshold AnalysisNTIA/EL-CID Online (Green)

Unique Project Identifier: NTIA038

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose:

A) The NTIA038 EL-CID Online Green (ECO) is a Major Application (MA) that provides the following core functions:

- Access to the ECO Workflow web application
- Access to the ECO Equipment Characteristics Editor
- Archival and indexing of certification requests with controlled access

B) The ECO and its component equipment are located within the DOC consolidated server facility within the National Capital Region and is not open to the public.

C) There is an Interconnect between the ECO and the DISA End-to-End Supportability System (E2ESS). The E2ESS system is a DoD system that allows DoD to submit certification requests directly to NTIA and to receive status information.

D) The purpose of the EL-CID Online is to improve NTIA spectrum certification data quality, reduce system review effort, and provide data dictionary-compliant automation to support spectrum certification data management in an unclassified environment that ensures confidentiality, integrity, and availability.

E) The ECO provides NTIA with a highly available tool to manage the Spectrum Certification application and approval process. It is an internal web application with all persistent storage in its database server.

F) The information in EL-CID Online is business identifiable information (BII).

G) Users of EL-CID Online are internal NTIA staff and external agencies. The external system hosted on the DMZ server is accessible to the public and does not require any credentials or authentication. DOD submits certification requests to EL-CID Online via web service calls.

H) Information retrieval is conducted only on the internal ECO Workflow application. In most cases, information is retrieved through a web interface, however for DoD data is retrieved through their E2ESS system.

I) Information is exchanged with the user-base through secure, encrypted connections whether connecting through the web interface or interconnected through secure channel with DoD.

Questionnaire:

1. Status of the Information System

1a. What is the status of this information system?

X This is a new information system. *Continue to answer questions and complete certification.*

____ This is an existing information system with changes that create new privacy risks. *Complete chart below, continue to answer questions, and complete certification.*

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions		d. Significant Merging		g. New Interagency Uses	
b. Anonymous to Non-Anonymous		e. New Public Access		h. Internal Flow or Collection	
c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Characterof Data	
j. Other changes that create new privacy risks (specify):					

____ This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*

____ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or01-2017). *Continue to answer questions and complete certification.*

____ This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2019 orlater). *Skip questions and complete certification.*

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

X Yes. This is a new information system.

____ Yes. This is an existing information system for which an amended contract is needed.

____ No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.

____ No. This is not a new information system.

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

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

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

X No.

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

X Yes, the IT system collects, maintains, or disseminates BII.

____ No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate PII?

As per OMB 17-12: "The term PII refers to information that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual."

____ Yes, the IT system collects, maintains, or disseminates PII about: *(Check all that apply.)*

____ DOC employees
____ Contractors working on behalf of DOC
____ Other Federal Government personnel
____ Members of the public

X__ No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

____ Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

X__ No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

X__ Yes, the IT system collects, maintains, or disseminates PII other than user ID.

____ No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4d. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

____ Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

_X_ No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the SAOP approved PIA must be a part of the IT system's Assessment and Authorization Package.

CERTIFICATION

X I certify the criteria implied by one or more of the questions above **apply** to the EL-CID Online (Green) NTIA038 and as a consequence of this applicability, I will perform and document a PIAfor this IT system.

_____ I certify the criteria implied by the questions above **do not apply** to the EL-CID Online (Green) NTIA038 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 Hite Office: OSM Phone: 202-482-4854 Email: rhite@ntia.gov Signature: Robert Hite Digitally signed by Robert Hite Date: 2021.04.13 08:35:57 -04'00' Date signed: _____	**Information Technology Security Officer** Name: Shine Kang Office: OPCM Phone: 202-482-1752 Email: skang@ntia.gov Signature: SHINE KANG Digitally signed by SHINE KANG Date: 2021.04.13 10:42:56 -04'00' Date signed: _____
Privacy Act Officer Name: Dr. Catrina D. Purvis Office: OPCM Phone: 240-672-4974 Email: cpurvis@ntia.gov Signature: CATRINA PURVIS Digitally signed by CATRINA PURVIS Date: 2021.04.15 14:05:58 -04'00' Date signed: _____	**Authorizing Official** Name: Dr. Catrina D. Purvis Office: OPCM Phone: 240-672-4974 Email: cpurvis@ntia.gov Signature: CATRINA PURVIS Digitally signed by CATRINA PURVIS Date: 2021.04.15 14:06:53 -04'00' Date signed: _____
Bureau Chief Privacy Officer Name: Dr. Catrina D. Purvis Office: OPCM Phone: 240-672-4974 Email: cpurvis@ntia.gov Signature: SHINE KANG Digitally signed by SHINE KANG Date: 2021.04.13 10:43:44 -04'00' Date signed: _____	