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U.S. Department of Commerce
National Technical Information Service

Privacy Threshold Analysis
for the
NTIS Business Systems (NTIS002)

U.S. Department of Commerce Privacy Threshold Analysis

[NTIS/NTIS Business Systems (TIS 002)

Unique Project Identifier: 86101

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:
The NTIS Business System (NTIS002) is the collection of major application that are hosted on NTIS servers located at the NTIS Data Center (5301 Shawnee Rd, Alexandria, VA 22312). These systems work together to allow NTIS to provide services and process finances for the general public, as well as internally. All products and services sold by NTIS are processed by the NTIS002 Information System. The Federal Information Processing Standards (FIPS) 199 security impact category for the system is Moderate.

NTIS002 utilizes the following major applications to achieve the NTIS mission; Budget Accounting Purchasing System (BAPS), Computing Information Service Publishing (CISPUB), Financial Reporting System (FRS), Cost Perform, ELAN, and a PAY.gov Client. These Major Applications work in hand to collect, process, and disseminate information across the NTIS002 system.

BAPS is designed to provide agency funds control, support and documentation for all of the agency expenditures, obligations, accruals, undelivered orders, accounts payable, advances to others, and disbursements, as well as audit documentation for NTIS. This system is used by NTIS employees in the offices of Business & Development and Budget & Accounting. Agency purchase requests are entered into BAPS which will then appropriately obligate funds or accruals. The system then waits for a vendor invoice which will require approval from NTIS staff. Once invoices are approved, payments are processed out-of-band by a US Treasury system and contract award information is then recorded back in BAPS.

The FRS application is used by NTIS Budgeting & Accounting. It consists of several Access Databases to include, labor, allocations, planning, ELAN input (order processing system), contractor labor, revenue, unit sales and some smaller Microsoft Access Databases (MDB). The areas of interest for reporting provides each director and section managers with data needed for their section's business. (Costs, performance, revenue, budgeting, etc.). FRS

combines data from the National Finance Center (NFC) Payroll System (manually imported), BAPS non-labor data, revenue planning, product revenue, and unit sales from ELAN. Using this data, FRS calculates and distributes NTIS' overhead to all products and services, calculates and distributes all NTIS allocated costs for local overhead and other allocated functions (customer service, product distribution, product management, sales desk, etc.) to all products and services, calculates revenue charged to service clients based on their agreement terms and combines all of this data to report revenue, cost and net by products and/or service products.

Cost Perform is a system utilized by NTIS employees in the offices of Business & Development and Budget & Accounting to determine and allocate agency overhead costs. Cost Perform utilizes data from BAPS and FRS to determine accurate agency overheads costs for planning and evaluation.

ELAN and PAY.gov Client are utilized to process the payments received by NTIS002. ELAN encrypts credit card data from transactions and sends the info to the PAY.gov Client, which returns a transaction ID. The transaction ID and the last 4 digits of the credit card are stored in the system. The PAY.gov Client validates or charges credit card, using the encrypted information from ELAN, through PAY.gov. The two web services communicate with each other in order to fully process a payment through PAY.gov.

CISPUB was replaced by Elan in April 2014. CISPUB is strictly used for reference and no new data is being entered into the system. The data that is stored in the system is kept because for legal record retention requirements that specify data must be kept for a minimum of 7 years, until 2019.

NTIS002 collects information from all individuals who order and/or purchase products and services from NTIS and all individuals who have requested to be placed on the NTIS promotional literature mailing list.

Information sharing across the NTIS002 subsystems include the following categories of data. This information includes name; address; nine-digit taxpayer identification number; items ordered; items sent; amount of purchases, date order received; date order mailed; NTIS deposit account or customer code number; total charge to date; whether account collectible or not; categories of publications ordered by each purchaser; when subscription expired; ELAN stores the last 4 digits of the credit card only; FRS has the individual salary and pay grades and correlates it to their name.

The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information is 15 U.S.C. 1151–57; 41 U.S.C. 104, 44 U.S.C. 3101.

Questionnaire:

1. What is the status of this information system?

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

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

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

X 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). *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 01-2017 or later). *Skip questions and complete certification.*

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

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

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

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

X No.

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

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

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

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

4. Personally Identifiable Information (PII)

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

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

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

- X DOC employees
- ____ National Institute of Standards and Technology Associates
- X Contractors working on behalf of DOC
- ____ Other Federal Government personnel
- X Members of the public

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

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

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

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

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

Provide the legal authority which permits the collection of SSNs, including truncated form.

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

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

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

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

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

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

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

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

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the 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 NTIS Business Systems and as a consequence of this applicability, I will perform and document a PIA for this IT system.

_____ I certify the criteria implied by the questions above **do not apply** to the [IT SYSTEM NAME] and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of Information System Security Officer (ISSO) or System Owner (SO): Pad Hosmane

Signature of ISSO or SO: PAd Hosmane Digitally signed by PAd Hosmane Date: 2020.10.07 13:40:14 -04'00' Date: _____

Name of Chief Information Security Officer (CISO): Bilal Baisa

Signature of CISO: BILAL BAISA Digitally signed by BILAL BAISA Date: 2020.10.07 13:17:04 -04'00' Date: _____

Name of Privacy Act Officer (PAO): Allison McCall

Signature of PAO: Allison McCall Digitally signed by Allison McCall Date: 2020.10.07 13:56:23 -04'00' Date: _____

Name of Authorizing Official (AO): Allison McCall

Signature of AO: Allison McCall Digitally signed by Allison McCall Date: 2020.10.07 13:56:50 -04'00' Date: _____

Name of Bureau Chief Privacy Officer (BCPO): Allison McCall

Signature of BCPO: Allison McCall Digitally signed by Allison McCall Date: 2020.10.07 13:57:14 -04'00' Date: _____