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U.S. Department of Commerce
National Institute of Standards and Technology

Privacy Threshold Analysis
for the
NCNR Laboratory Computing System (610-02)

U.S. Department of Commerce Privacy Threshold Analysis

National Institute of Standards and Technology

Unique Project Identifier: 610-02

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: *Provide a general description of the information system in a way that a non-technical person can understand.*

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).

a) *Whether it is a general support system, major application, or other type of system*
The NIST Center for Neutron Research (NCNR) Laboratory Computing System is a general support system.

b) *System location*
The NCNR Laboratory Computing System components are located at the NIST Gaithersburg, Maryland facility within the continental United States.

c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
The NCNR Laboratory Computing System is a standalone system.

d) *The purpose that the system is designed to serve*
NCNR's primary function is scientific research and development of methods for measuring physical and chemical properties of matter, in collaboration with external users.

e) *The way the system operates to achieve the purpose*
The NCNR Laboratory Computing System supports administration and management of facility and equipment access through the following components:

- The Information Management System (IMS) supports soliciting and reviewing proposals for scientific experiments at NCNR and allocating instrument time through a web portal. The portal also includes submission of information to process

individuals in systems to ensure work agreements are in place, and to ensure scheduled facility users have access to the campus.

- The NCNR physical access system enables multi-level access controls on the internal access points within the facility, limiting access to the Reactor Operator area. The laboratory computing system doesn't contain any biometrics. However, physical access security may rely upon biometrics. In addition, motion detection recording cameras are in controlled areas (e.g., chemistry labs) to support detection of unauthorized access.

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

The type of information includes: identifying numbers, general personal data, work-related data, distinguishing features/biometrics, and system administration/audit data.

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

The NCNR Laboratory Computing System is accessed by authorized NIST staff. The interface allows information to be retrieved by the person who registered and created an individual profile.

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

The NCNR Laboratory Computing System allows information to be retrieved by the person who registered and created an individual profile. Public users can only retrieve their own profile information. Authorized NIST users retrieve information directly from the component.

i) How information is transmitted to and from the system

The NCNR Laboratory Computing System obtains information by (1) identifying people who have been invited to register for NCNR facilities use; and (2) managing non-sensitive customer email and contact information.

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):

___ 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.*

_X__ 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 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. *Please describe the activities which may raise privacy concerns.*
The system includes recording video surveillance, biometrics, and internal building entry readers.

____ 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.)."

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

___ Companies
___ Other business entities (academic and other research partners)

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

4. Personally Identifiable Information

4a. Does the IT system collect, maintain, or disseminate personally identifiable information (PII)?

As per OMB 07-16, Footnote 1: "The term 'personally identifiable information' refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc... alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc..."

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

___ DOC employees
___ Contractors working on behalf of DOC
___ 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 PII other than user ID?

____ 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.

4c. 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.

____ 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, and/or 4c 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 NCNR Laboratory Computing System (610-02) 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 NCNR Laboratory Computing System (610-02) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of System Owner (SO):

Alan Munter

Signature of SO: _____ Date: 9/25/19

Name of Information Technology Security Officer (ITSO):

K. Robert Glenn

Signature of ITSO: _____ Date: 9/25/19

Name of Co-Authorizing Official (AO):

Robert Dimeo

Signature of Co-AO: _____ Date SEP 2 4 2019

Name of Co-Authorizing Official (AO)/Bureau Chief Privacy Officer (BCPO):

Susannah Schiller, Acting

Signature of AO/BCPO: SUSANNAH SCHILLER Digitally signed by SUSANNAH SCHILLER Date: 2019.09.26 16:08:03 -04'00' Date: 9/26/19