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U.S. Department of Commerce
NOAA

Privacy Impact Assessment
for the
NOAA0900
NOAA Emergency Notification System (NOAA ENS)

Reviewed by: _____, Bureau Chief Privacy Officer
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Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer Date

U.S. Department of Commerce Privacy Impact Assessment
NOAA/NOAA ENS (0900)

Unique Project Identifier: 006-000351100 00-48-02-00-01-00

Introduction: System Description

National Oceanic and Atmospheric Administration (NOAA) is committed to emergency preparedness, including communicating with NOAA staff prior to, during, and after an all-hazards or emergency events. NOAA's Emergency Notification System (ENS) is a commercial cloud-based application by which designated NOAA persons can quickly broadcast emergency alerts to NOAA staff via phone, text, and email. It provides NOAA staff with consistent event specific information and direction, and ability to account for staff in the aftermath thereof. The information in the system is obtained from the NOAA Staff Directory (NSD) and consists of: name, work phone number, work cell phone number, work email address, and work mailing address. In addition, NOAA staff may choose to enter their personal mobile phone number and personal email address into the NSD for upload to the NOAA ENS. There is no information sharing outside of NOAA other than if contact information is needed for a privacy incident response.

The cloud-based application is owned by Everbridge, Inc. The locations are Amazon Web Services West region: Burbank, California and Denver, Colorado.

The authority for the collection of this data is Federal Continuity Directive 1, Code of Federal Regulations, Title 41, Chapter 102 Federal Management Regulation (FMR), Part 102-74 (41 CFR §102-74.230 - 102-74.260), DOC's Departmental Organizational Order (DOO) 20-6, and guidance provided by DOC's Manual of Security Policies and Procedures, Chapter 7.

This is a moderate impact system.

Section 1: Status of the Information System

1.1 Indicate whether the information system is a new or existing system.

____ This is a new information system.
____ This is an existing information system with changes that create new privacy risks. *(Check all that apply.)*

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		f. Commercial Sources		i. Alteration in Character	

Management Changes				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.

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.)*

Identifying Numbers (IN)					
a. Social Security*		e. File/Case ID		i. Credit Card	
b. Taxpayer ID		f. Driver's License		j. Financial Account	
c. Employer ID		g. Passport		k. Financial Transaction	
d. Employee ID		h. Alien Registration		l. Vehicle Identifier	
m. Other identifying numbers (specify):					
*Explanation for the need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	X	g. Date of Birth		m. Religion	
b. Maiden Name		h. Place of Birth		n. Financial Information	
c. Alias		i. Home Address		o. Medical Information	
d. Gender		j. Telephone Number	X	p. Military Service	
e. Age		k. Email Address	X	q. Physical Characteristics	
f. Race/Ethnicity		l. Education		r. Mother's Maiden Name	
s. Other general personal data (specify):					

Work-Related Data (WRD)					
a. Occupation		d. Telephone Number	X	g. Salary	
b. Job Title		e. Email Address	X	h. Work History	
c. Work Address	X	f. Business Associates			
i. Other work-related data (specify):					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints		d. Photographs		g. DNA Profiles	
b. Palm Prints		e. Scars, Marks, Tattoos		h. Retina/Iris Scans	
c. Voice Recording/Signatures		f. Vascular Scan		i. Dental Profile	
j. Other distinguishing features/biometrics (specify):					

System Administration/Audit Data (SAAD)					
a. User ID		c. Date/Time of Access		e. ID Files Accessed	
b. IP Address		d. Queries Run		f. Contents of Files	
g. Other system administration/audit data (specify):					

Other Information (specify)

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

Directly from Individual about Whom the Information Pertains					
In Person		Hard Copy: Mail/Fax		Online	X
Telephone		Email			
Other (specify):					

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

Non-government Sources					
Public Organizations		Private Sector		Commercial Data Brokers	
Third Party Website or Application					
Other (specify):					

2.3 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.

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.

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			
To determine eligibility		For administering human resources programs	
For administrative matters	X	To promote information sharing initiatives	
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
To improve Federal services online		For employee or customer satisfaction	
For web measurement and customization technologies (single-session)		For web measurement and customization technologies (multi-session)	
Other (specify): communicating with NOAA staff prior to, during, and after an all-hazards or emergency events.			

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).

The NOAA ENS is a cloud-based, software-as-a-service, vendor-hosted mass notification system that provides tools for reaching pre-defined contacts during an emergency situation. The purpose of the Emergency Notification System is to simplify management of emergency communication processes and procedures quickly and easily to communicate with all employees, Associates and visitors. This system is designed to help respond in a fast and decisive way during emergency situations. The multi-modal communications system, including phone, text, email, pagers, and more, allows NOAA to rapidly and efficiently reach our staff wherever they are. This ensures the life safety and security of all staff (including contractors) during emergencies.

The data collected contains personally identifiable information (PII) obtained from the NOAA Staff Directory (employees and contractors) and/or disclosed by the end-user for contacting in the case of emergency situations.

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.)*

Recipient	How Information will be Shared		
	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):			

*In case of a privacy breach

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

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

X	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: NOAA0201, which contains the NOAA staff directory. *There is no direct connection: the data is loaded onto a server, and downloaded by ENS.*

	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.3 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.	
X	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: __http://www.homelandsecurity.noaa.gov/ (bottom left of page). There is also a link to it on ENS's page after logging in, but that is not accessible except to ENS users. You can request the log-in screen from this page: https://manager.everbridge.net/saml/login/NOAA but you will not be able to log in, of course. I have sent a screenshot of the page in the cover email.	
X	Yes, notice is provided by other means.	Specify how: Notice is provided to client users when they provide optional information to the NOAA Lightweight Directory Access Protocol (staff directory). There is a warning notice on the page on which information is submitted.
	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 decline to provide PII/BII.	Specify how: Work related PII is automatically uploaded to the system from the staff directory; however, personal PII, e.g. personal cell phone number, is optional.
	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not:

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

X	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how: Users are presented with the options on the staff directory (LDAP) screen where data is optionally entered. The only uses for the information in the staff directory are for contacting staff routinely, or once the info is in ENS, for contacting staff by ENS in emergencies.
	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 review/update PII/BII pertaining to them.	Specify how: Users are presented with the options on the staff directory (LDAP) screen where data is optionally entered. This update reminder is displayed upon system entry for any purpose.
	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

Section 8: Administrative and Technological Controls

8.1 Indicate the administrative and technological controls for the system. *(Check all that apply.)*

	All users signed a confidentiality agreement or non-disclosure agreement.
	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: System user account access is tracked.
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): 6/17/2017_____ ☐ 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 and privacy controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POAM).
X	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
	Contracts with customers establish ownership rights over data including PII/BII.
	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.

Access is restricted, requiring authorized users, those with a "need to know", to log in. Account access is tracked. Information from the NOAA Staff Directory is uploaded to a server and downloaded by ENS, rather than having a direct connection.

Section 9: Privacy Act

9.1 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 by 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	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name and number *(list all that apply)*: Yes, this system is covered by an existing system of records notice. Provide the system name and number: DEPT-18: Employees' personnel files not covered by notices of other agencies. That is, the information in this system is a subset of that information.
	Yes, a SORN has been submitted to the Department for approval on (date).
	No, a SORN is not being created.

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	There is an approved record control schedule. Provide the name of the record control schedule: There is an approved record control schedule. "Destroy immediately after copying to a recordkeeping system or otherwise preserving, but longer retention is authorized if required for business use." from http://www.corporateservices.noaa.gov/audit/records_management/schedules/index.html , Chapter 200-12.
	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		Overwriting	X
Degaussing		Deleting	
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Levels

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.

X	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.
	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 levels. *(Check all that apply.)*

X	Identifiability	Provide explanation: Individuals may be identified.
X	Quantity of PII	Provide explanation: PII is limited to contact information.
X	Data Field Sensitivity	Provide explanation: There is no sensitive PII collected.
X	Context of Use	Provide explanation: ENS is used for emergency contact/notification purpose only.
	Obligation to Protect Confidentiality	Provide explanation:
X	Access to and Location of PII	Provide explanation: Restricted access to LDAP server (authentication log in) and ENS use.
	Other:	Provide explanation:

Section 12: Analysis

12.1 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.

12.2 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.