U.S. Department of Commerce
NOAA

Privacy Impact Assessment
for the
NOAA2220 Fleet Support System (FSS)

Reviewed by: _____, Bureau Chief Privacy Officer

☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

☐ Non-concurrence of Senior Agency Official for Privacy/DOC 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 / Fleet Support System (FSS)

Unique Project Identifier: 006-48-01-15-02-3601-00

Introduction: System Description

The NOAA2220 is a general support System consisting of ships, aircraft, land and cloud -based support systems located across NOAA's Marine operations centers (MOCs), located in Norfolk, Virginia; Honolulu, Hawaii; and Newport, Oregon. Additional ship-specific support is provided through port office facilities in Woods Hole, Massachusetts; Davisville, Rhode Island; Charleston, South Carolina; Pascagoula, Mississippi; and Ford Island, Hawaii. Limited pier-side support is also provided to ships in Newport, Rhode Island and Kodiak, Alaska. The Fleet Support System is categorized as a Moderate impact system as documented in the NOAA2220 Federal Information Processing Standards (FIPS) 199.

The ship and aircraft systems are designed with the capability to operate in a stand-alone environment in order to perform functions remotely while deployed around the world however NOAA2220 is interconnected with NOAA TIC and NOAA NOC at most logical and physical nodes and with ships and aircraft while powered on and in port. The purpose of the NOAA2220 system is to support NOAA's mission operations in the collection, processing and distribution of oceanic and atmospheric data. To facilitate this NOAA2220 systems are deployed on ships and aircraft around the world for the purpose of collecting, processing and distributing data as stated above. In addition to oceanic and atmospheric data collection, selected systems on NOAA ships also supports common shipboard IT infrastructure functions include network connectivity, domain authentication, internet connectivity, and general business support services, such as file and print services. Due to the nature of shipboard operations ships may also carry a limited amount of administrative PII to carry out the necessary human resource management. The NOAA2220 Fleet Support System (FSS) managed, operated and maintained by a segment of NOAA's Office of Marine and Aviation Operations (OMAO) personnel consisting of Information Technology (IT) and mission personnel that are designated throughout OMAO to have access to information on the system. Users and operators of the system access information from computer terminals and workstations. Information is transmitted to and from the systems in multiple ways depending on the platform. For Ships and aircraft satellite communication systems, such as Inmarsat and VSAT are the connection paths during missions, and connect to NOAA networks and the internet via contract service providers while in port.

Typical PII transactions in the NOAA2220 system consist of transmitting information to and from NOAA Workforce Management Office, to facilitate Human Resources (HR) processes, processing of benefits for wage mariners, and continuation of medical care for sick and injured

mariners, and as required by other government agencies and industry. For HR processes and processing of wages, NOAA2220 collects: name, work and home addresses, telephone numbers and email addresses; and passport number for travel purposes. This data is secured through physical controls for facilities and encryption at rest for soft copies. Currently NOAA2220 stores Health Insurance Portability and Accountability Act (HIPAA) information in a secure manner at Marine Operation Center-Atlantic (MOC-A), Marine Operation Center Pacific (MOC-P), and HQ: hard copies are secured by physical controls implemented at each facility that meets NIST SP 800-53 rev.4 requirements; and soft copies data is encrypted at rest. The HIPAA information consists of medical information for NOAA employees and guests who sail on a NOAA vessel, as well as for contractors who will be on board for more than 24 hours. This information is transmitted as needed via secure means by Accellion, secure e-mail, or fax (with notification to the recipient so he/she will be standing at the fax machine). There are multiple medical officers who share responsibility for collecting and transmitting HIPAA information. Any medical officer who has this responsibility is trained and aware of how to handle such information. NOAA2220 collects two forms of identification (Commerce ID, Driver's license number and/or passport number) in order to issue a CAC or Alt tokens. The system also collects user-id and date-time access information for federal employees and contractors with a valid CAC cards at MOC-P and MOC-A. The form used to collect this information is DD-2841. These forms are stored on NOAA1200 on a file server once received by Local Registration Authority (LRA). Information is shared on an as-needed basis after both authorization and need to know have been determined. Most information that needs to be shared is collected and sent to the NOAA Workforce Management Office for dissemination. There are some instances where NOAA employees' PII will be sent to other Department of Commerce (DOC) agencies and to other federal agencies if the employees are detailed temporary or permanently. There is also a small amount video of PII as associated with a few security cameras on board ships and located in secured spaces in OMAO Port offices. The video data captured is stored on secure computer and only accessed by authorized personnel. The aircraft collect a minor amount of PII as part of the scientific crew manifests required during preflight to account for the number of souls onboard during aircraft missions. This data may consist of first name, last name and their flight position (i.e. pilot, navigator, chief scientist, and guest). As part of the preflight brief procedures guest and non-NOAA personnel are notified and given the option to opt out. This information is transmitted with the raw data off the aircraft. The raw data set is publically available on the public web server.

NOAA2220's legal authorities to collect PII are: Title 5 U.S.C., Title 31 U.S.C. 66a, 492, Title 44 U.S.C. 3101, 3309, Title 29 U.S.C 651-78, Title 28 U.S.C. 2671-2680, Executive Order 12196, Budget and Accounting Act of 1921; Accounting and Auditing Act of 1950; and Federal Claim Collection Act of 1966, Title 33 U.S.C. 853i; 853j; 853j-1; 853t; 854; 854a-1; 857-5, 857a, 855, Title 37 U.S.C; Executive Order 10450, Title 16 U.S.C. 143, and Executive Order 11222.

The Fleet Support System is categorized as a Moderate impact system as documented in the NOAA2220 Federal Information Processing Standards (FIPS) 199.

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 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 a SAOP approved Privacy Impact Assessment (version 01-2015 or later).

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	X	j. Financial Account	
c. Employer ID	X	g. Passport	X	k. Financial Transaction	
d. Employee ID	X	h. Alien Registration		l. Vehicle Identifier	
m. Other identifying numbers (specify): HR and Medical Files/Records are stored in NOAA2220 on file servers that have least-privilege functions enforced on them and only authorized personnel can view them; and these records are transmitted via fax or secure file transfer to service entities. DOB, HIPAA information, and other PII are collected only when needed by the requesting staff office in order to provide continuity of care, maintain official records (personnel records/officer records), and HR Processes including hiring, travel and performance appraisals.					
*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	X	m. Religion	
b. Maiden Name	X	h. Place of Birth	X	n. Financial Information	
c. Alias	X	i. Home Address	X	o. Medical Information	X
d. Gender	X	j. Telephone Number	X	p. Military Service	X
e. Age	X	k. Email Address	X	q. Physical Characteristics	
f. Race/Ethnicity		l. Education	X	r. Mother's Maiden Name	
s. Other general personal data (specify):					

Work-Related Data (WRD)					
a. Occupation	X	d. Telephone Number	X	g. Salary	X
b. Job Title	X	e. Email Address	X	h. Work History	X
c. Work Address	X	f. Business Associates			
Other work-related data (specify): Medical records regarding injuries and sickness acquired while underway as necessary to facilitate care when at sea and ashore.					

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	X	c. Date/Time of Access	X	e. ID Files Accessed	
b. IP Address	X	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	X	Hard Copy: Mail/Fax	X	Online	
Telephone	X	Email	X		
Other (specify):					

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

Sometimes we have NOAA employees who transfer within DOC to other offices such as DOC Office of the Inspector General (OIG) and we are required to transfer PII information. Whenever PII is transmitted to DOC or other federal agencies, it is done via fax or Accellion.

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

*Private medical office

2.3 Describe how the accuracy of the information in the system is ensured.

The following processes are used to ensure the accuracy of PII in the system. Personnel who enter PII quality check the information as they enter to insure no errors. Medical information is kept accurate by requesting individuals/patients review and update their individual medical PII during their employment process and at each annual, bi-annual, or every five year requirement for physicals. Further medical information is reviewed for accuracy by the medicals staff as they update and enter new records. Human Resource information is kept accurate. Individuals have the opportunity to update their information by contacting the servicing line office in writing to review and update their information. Further, during each evaluation period Managers ensure that each employee will have an opportunity to review and update their PII before signing their evaluation form.

2.4 Is the information covered by the Paperwork Reduction Act?

	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
X	No, the information is not covered by the Paperwork Reduction Act.

2.5 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	X*	Electronic purchase transactions	
Other (specify):			

*NOAA2220 ships have a Closed Circuit Television (CCTV) system that is used to record video throughout the ship for the purpose of safety. Ships' personnel are notified by signs located throughout the ship that state that these premises are under video surveillance and cameras in use. Least privileges are enforced for access to the video

surveillance data. Only authorized personnel will have access. The NOAA2220 System Owner will be responsible for granting access and controlling who has access to this information. The orientation packet given to those traveling on the ships includes a vessel orientation and a statement about safety compliance.

	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			
For a Computer Matching Program		For administering human resources programs	X
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): Medical care.			

NOAA2220 ships have a Closed Circuit Television (CCTV) system that is used to record video throughout the ship for the purpose of safety. The orientation packet given to those traveling on the ships includes a vessel orientation and a statement about safety compliance.

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).

NOAA2220 gathers PII as necessary and requested in order to facilitate the HR processes, provide continuity of medical care to injured and sick wage mariners/NOAA Corp Officers/Visitors riding NOAA vessels, and perform administrative functions such as the training and relocation of employees (Federal employees/contractors).
For HR processes and processing of mariner wages, we collect: name, work and home addresses, telephone numbers and email addresses and passport number for travel purposes. This information is collected through hiring processes, mid-term and annual evaluation periods, and awards. This information is stored on a file server and encrypted at rest NOAA2220 collects Health Insurance Portability and Accountability Act (HIPAA) information which consist of medical information (health examination information) for OMAO employees. All of OMAO employees are federal employees; however there may be times when a LO may send a contractor to a ship for over a period of 24 hours and thus a medical evaluation will be conducted. In addition, any person becoming injured or ill on a ship would be treated, and the treatment would become part of the person's medical record. This applies to guests on the ships, also (Federal employees, contractors, members of the public).
NOAA2220 collects information only at the behest of other primary care providers and line offices. Requests for information can come from Veterans Administration, Primary Care Providers, Workforce Management or other line offices as they staff personnel for shipboard research objectives. Medical records will be shared as needed with an individual's primary care physician. Whenever an NOAA/OMAO employee transfers to another DOC or federal agency or to a private physician, we are required to transmit those individuals' PII (Medical information

and additional PII, along with a signed consent form). PII is transmitted via Accellion. NOAA2220 collects two forms of identification (Commerce ID, Driver's license number and/or passport number) in order to issue a CAC or Alt tokens. The system also collects userid and date-time access information for federal employees and contractors with a valid CAC cards at MOC-P and MOC-A. The form used to collect this information is DD-2841. These forms are stored on NOAA1200 on a file server once received by Local Registration Authority (LRA). For some aircraft missions a log is hand written during the course of the mission. Comments from the crew member and or scientists are written on the log and the last name and/or name of the commenter is noted. The log is scanned and uploaded to the applicable data directory. The crew member is typically a Commissioned Officer and or a Civil Servant. The scientist can be a federal employee/contractor, member of the public, foreign national, and or a visitor.

5.2 Describe any potential threats to privacy as a result of the bureau's/operating unit's use of the information, and controls that the bureau/operating unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

NOAA2220 only has the least amount of PII required in order to operate. The only potential threat is the accidental loss of this information. NOAA2220 has put the following controls in place to ensure that the information is handled, retained, and disposed appropriately. NOAA2220 employs hard drive encryption for the laptops that OMAO medical staff uses to store employees PII. This encryption is FIPS 140-2 validated. For HR information, NOAA2220 employs Virtual Local Area Networks. Further NOAA2220 follows, DOC and NOAA mandates as well as trains applicable personnel to ensure that the information is handled, retained, and disposed appropriately.

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			X**
Private sector	X*		
Foreign governments			
Foreign entities			
Other (specify):			

** This only applies to the aircraft mission log. No other PII.
*To new private physician

	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.

	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:
X	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	X*	Government Employees	X
Contractors	X		
Other (specify):			

* This only applies to the aircraft mission log. No other PII.

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: https://www.cio.noaa.gov/itmanagement/pdfs/NOAAPrivacyPolicy_Final_May2017.pdf Also There is Public Health Services Privacy Act statement in the medical release form.. It is included in this PIA, just before the signature page. There is also a PAS in the hard copy policy and guidance document given to flight registrants.

X	Yes, notice is provided by other means.	Specify how: The line office provides notice to the employee/contractor on medical-related forms that have the privacy act statement included. Medical information is taken (by medical staff) with the sick/injured person on site and is conveyed strictly for continuity of care. This information is only available within OMAO by qualified medical personnel. A release of information form must be submitted in order for this information to be disseminated outside of the line office and signed by the individual whose information is being released. Performance plans provide notice as part of the forms, but no privacy act statement is included. For the PII on the aircraft log (passengers name), the Flight Director provides notice to the passengers during the preflight brief. For video surveillance captured onboard ships the ships personnel are notified by signs located throughout the ship that state that these premises are under video surveillance and cameras in use.
	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: A release of information form MUST be signed by the patient prior to information being released by or to OMAO. If this document is not signed, medical staff does not release the information. This medical information is used *only* to determine the level of care/intervention needed for a patient. The release is only for medical information, as stated on the privacy act statement. For administrative functions: Certain users (Privileged Users) may decline to provide PII info on a DD-2841 form; however, this will prevent them from receiving a Alt Token and that will prevent them from being HSPD-12 compliant. NOAA/OMAO employees may decline to provide PII information on performance evaluations.
	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: A release of information form MUST be signed by the patient prior to information being released by or to OMAO. If this document is not signed, medical staff does not release the information. This medical information is used *only* to determine the level of care/intervention needed for a patient. The release is only for medical information. For administrative functions: Employees are able to consent to particular uses of their PII. Whenever information is requested from an employee for a particular use within the office or bureau, their signature is required or it will not be released.
	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

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: Medical information is updated as new injuries/sicknesses occur to the patient. This information requires a release form to be signed by the patient in order for it to be released. All individuals are made aware of the opportunity to update PII during their employment process and at each annual, bi-annual, or every five year requirement for physicals. For administrative functions, individuals have an opportunity to update their information by contacting the servicing line office in writing to update/review PII pertaining to them in accordance with their guidelines. Otherwise, during each evaluation period each employee will have an opportunity to update their PII before signing their evaluation form.
	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.)*

X	All users signed a confidentiality agreement or non-disclosure agreement.
X	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: NOAA2220 has security controls in place to audit user activities to network share drives where PII/BII is stored.
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): 7/23/2018 ☐ 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 controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M).
X	A security assessment report has been reviewed for the supporting information system and it has been determined that there are no additional privacy risks.
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. *(Include data encryption in transit and/or at rest, if applicable).*

NOAA2220 employs hard drive encryption for the laptops that OMAO medical staff uses to store employees PII. This encryption is FIPS 140-2 validated. For HR information, NOAA2220 employs Virtual Local Area Networks (VLANs)*, and all data is behind firewalls for protection from outside adversaries. * A VLAN is any broadcast domain that is partitioned and isolated in a computer network at the data link layer (OSI layer 2). ** The web server that stores the mission logs is open to the general public. The server itself is secured, scanned, and backed up on a regular basis.

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, number, and link. *(list all that apply)*: NOAA-10, NOAA Diving Program File; DEPT- 1, Attendance, Leave, and Payroll Records of Employees and Certain Other Persons, DEPT-7, Employee Accident Records, DEPT-18, Employees Information Not Covered by of Other Agencies and NOAA-22, NOAA Health Services Questionnaire (NHSQ) and Tuberculosis Screening Document (TSD). Also, OPM/GOVT-1, General Personnel Records, OPM-2, Employees Performance File Records apply.
	Yes, a SORN has been submitted to the Department for approval on (date).
	No, this system is not a system of records and a SORN is not applicable.

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: NOAA Records Management Office requires medical records be handled in accordance with (IAW) Record Schedule 311-02. When applicable all other PII is handled in accordance with NOAA and DOC record schedules: 1700, 200, 600, or other applicable Records Management Schedules. NOAA2220 relies on the servicing staff office to maintain these documents in accordance with the NOAA defined records schedule.
	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	X	Overwriting	X
Degaussing		Deleting	X
Other (specify): When a NOAA2220/OMAO medical staff employee departs and returns their laptop to NOAA2220 IT staff the machine is sanitized in accordance with NIST SP 800-88 requirements. The same is conducted for servers within the NOAA2220 boundary that stores HR information on employees.			

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

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. *(The PII Confidentiality Impact Level is not the same as the Federal Information Processing Standards (FIPS) 199 security impact category.)*

	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.
X	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: The information directly identifies a large amount of individuals using names, phone numbers, address, HIPAA information. For the aircraft mission logs the PII is a scanned copy of hand written flight-log which contains a historical details about the flight-mission which includes the (passengers names) that where on the flight but no other PII.
X	Quantity of PII	Provide explanation: There is a significant amount of PII.
X	Data Field Sensitivity	Provide explanation: There is sensitive data entered in the system is entered on forms and is stored in a secure manner, accessible by only approved individuals and saved in .pdf form to limit any alteration.
X	Context of Use	Provide explanation: The release of this information could cause moderate harm to the individuals due to the sensitivity of the PII being collected and in some case released. For the aircraft mission logs, the information is accessible to the public and the release of the information, modification of the content and denial of availability would have no adverse effect on organizational

		operations, organizational assets, or individuals.
X	Obligation to Protect Confidentiality	Provide explanation: NOAA2220 is obligated under the Health Insurance Portability and Accountability Act (HPAA) to protect the confidentiality of the PII is process, stores, or transmits and does so by encrypting data at rest and using access controls.
X	Access to and Location of PII	Provide explanation: The information is accessed by Medical staff and Supervisors only with the need to know. Although in some cases the medical staff and supervisor may have laptops they don't store any PII on them and in the case that they may all laptops are encrypted.
	Other:	Provide explanation:

Section 12: Analysis

12.1 Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

NOAA2220 only has the least amount of PII required in order to operate. The only potential threat is the accidental loss of this information. NOAA2220 has put the following controls in place to ensure that the information is handled, retained, and disposed appropriately. Further NOAA2220 follows, DOC and NOAA mandates as well as trains applicable personnel to ensure that the information is handled, retained, and disposed appropriately.

12.2 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.

12.3 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.