U.S. Department of Commerce
National Oceanic and Atmospheric Administration

Privacy Threshold Analysis
for the
National Centers for Coastal Ocean Science (NCCOS) Research
Support System (NOAA6301)

U.S. Department of Commerce Privacy Threshold Analysis

NOAA/National Centers for Coastal Ocean Science (NCCOS) Research Support System (NOAA6301)

Unique Project Identifier: 006-00-02-00-01-0511-00

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).

The NOAA6301 National Centers for Coastal Ocean Science (NCCOS) Research Support System provides the network infrastructure, hardware and software necessary to enable the mission of NCCOS, the organization. NCCOS's mission is to provide coastal managers with scientific information and tools needed to balance society's environmental, social, and economic goals.

NCCOS is passionate about supporting NOAA's environmental and economic missions by providing valuable scientific information to its constituents. NCCOS's fundamental principles are:
•To deliver high–quality science in a timely and consistent manner using productive and strong partnerships.
•To develop and maintain relevant research, long–term data collection and analyses, and forecasting capabilities in support of its customers, stakeholders, and partners.
•To build capacity in the private, local, state, and tribal sectors by transferring technology and providing technical assistance and knowledge to its customers and partners.
•To conduct the anticipatory science necessary to manage potential impacts of multiple stressors on coastal ecosystems.

The NOAA6301 system:
• provides support to the program areas which are responsible for conducting research in the areas of marine bio-toxins; eco-toxicology; forensics; biotechnology; marine mammal stranding and necropsies; risk analysis; DNA sequencing; and marine related viruses and pathogens;
• provides an operational environment supporting the mission and staff of the program offices located on the Silver Spring Metro Center Campus - NCCOS Head Quarters (HQ), Center for Sponsored Coastal Ocean Research (CSCOR), and Center for Coastal Monitoring and

Assessment (CCMA); Beaufort, NC - Center for Coastal Fisheries and Habitat Research (CCFHR); Charleston, SC – Center for Coastal Environmental Health and Biomolecular Research (CCEHBR) and Hollings Marine Laboratory (HML); and Oxford, MD – Cooperative Oxford Laboratory (COL); Beaufort, NC (CCFHR); Charleston, SC (CCEHBRC and CHHR/HML); and Oxford, MD (CCEHBRO);

provides all resources related to data management, electronic file, COTS, printing, computer and software, field data acquisition, backup and restoration, LAN and WAN, helpdesk, specialty applications for GIS and statistical analysis, moderate programming, Web design and Web product delivery, video conferencing, and other media support services; and
• provides continued service to the local area network (LAN) and the wide area network (WAN) connections for non-SSMC locations.

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). *Continue to answer 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.*

__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 about: *(Check all that apply.)*

_____ Companies
__X__ Other business entities

_____ 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..."

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

__X__ DOC employees
__X__ Contractors working on behalf of DOC
__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 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.

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.

__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, 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 the National Centers for Coastal Ocean Science (NCCOS) Research Support System (NOAA6301) 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 National Centers for Coastal Ocean Science (NCCOS) Research Support System (NOAA6301) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of Information System Security Officer (ISSO): <u>Rohit Munjal</u>

Signature of ISSO: MUNJAL.ROHIT.1500946381
Digitally signed by MUNJAL.ROHIT.1500946381
Date: 2018.01.05 09:43:16 -05'00'

Date: _____

Name of Information Technology Security Officer (ITSO): <u>John D. Parker</u>

Signature of ITSO: PARKER.JOHN.D.1365835914
Digitally signed by PARKER.JOHN.D.1365835914
Date: 2018.01.17 14:18:00 -05'00'

Date: _____

Name of Authorizing Official (AO): <u>Steven Thur</u>

Signature of AO:
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Date: 2018.01.19 07:49:11 -05'00'

Date: _____

Name of Bureau Chief Privacy Officer (BCPO): <u>Mark Graff</u>

Signature of BCPO: GRAFF.MARK.HYRUM.1514447892
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DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=OTHER, cn=GRAFF.MARK.HYRUM.1514447892
Date: 2018.01.23 10:18:48 -05'00'

Date: _____