

**U.S. Department of Commerce
NOAA**



**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: 006-48-02-00-01-0511-00

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:

National Centers for Coastal Ocean Science (NCCOS) mission is to deliver ecosystem science solutions for stewardship of the Nation's ocean and coastal resources to sustain thriving coastal communities and economies. NCCOS helps NOAA meet its coastal stewardship and management responsibilities, and provides coastal managers with the scientific information necessary to decide how best to protect environmental resources and public health, preserve valued habitats, and improve the way communities interact with coastal ecosystems.

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.

NCCOS has research facilities located in Silver Spring, MD; Charleston, SC; Beaufort, NC; and Oxford, MD. Each facility contributes to the overall mission of the Program Office along with unique partnerships and cooperatives established to support and further strategic science goals.

NOAA6301 is a Research Support System for the National Centers for Coastal Ocean Science (NCCOS) Program Office, and provides the network infrastructure, hardware and software necessary to enable the mission of NCCOS, the organization.

The NOAA6301 system:

- provides support to the Stressor Impacts & Mitigation (SIM) program that focuses on ecological forecasting, stressor detection, and an understanding of stressor impacts on coastal resources. NCCOS conducts its research in two SIM sub-priorities:
 - Harmful Algal Blooms
 - Biological Effects of Contaminants and Nutrients
- provides support to the *Marine Spatial Ecology (MSE)* program that integrates a broad spectrum of physical, biological, and social sciences, to inform coastal and marine decision making, and provides unique capabilities to ensure that special places are valued, protected, and preserved, and to assist in growing the economies that are dependent on our nation's maritime resources. NCCOS has identified four MSE sub-priorities:
 - Ecological and Biogeographic Assessments
 - Habitat Mapping
 - Regional Ecosystem Science
 - Coastal Aquaculture Siting and Sustainability
- provides support to the *Coastal Change* program, that seeks to understand the ecosystem services to improve a community's resistance to the impacts of weather and changing climate conditions, and provide timely and actionable scientific assessments, information, and tools that coastal communities use to make risk management decisions. NCCOS has identified four Coastal Change portfolio sub-priorities:
 - Vulnerability and Risk Assessment
 - Natural and Nature-Based Features
 - Climate Impacts on Ecosystems
 - Restoration
- provides support to the *Social Science* programs that focuses on the study of connections between people and the environment and prioritizes investigations into these connections within three interconnected sub-priorities of research:
 - Ecosystem Services Valuation
 - Assessing Human Use
 - Assessing Vulnerability and Resilience
- provides an operational environment supporting the overall mission and division staff located in the Silver Spring Metro Center Campus, MD; Beaufort, NC; Charleston, SC; and Oxford, MD;
- 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 networks (LANs) and the wide area network (WAN) connections for non-SSMC locations;

In addition to the general purposes office automation support (file/printer sharing, application hosting, collaboration, etc.) provided by NOAA6301, the system provides help desk services and supports a number of web sites and internal minor applications.

As detailed in the information sharing section below, NCCOS gathers and stores PII related to employees and contractors for Human Resource-related issues such as the hiring process as well as workforce planning, COOP Operations, and documentation. The NCCOS collects BII during the pre and post activities associated with the acquisition and management of contracts.

Information Sharing

NOAA6301 NCCOS Research Support System General Support System (GSS) collects and collects and stores limited PII, specifically, names, telephone numbers and email addresses (voluntarily submitted by staff, partners, volunteers, and government and non-government collaborators) to facilitate internal and external communications to facilitate business and collaborative functions. This is not a central collection, but rather separated by function or individual project or person.

NOAA6301 is a general support system for NCCOS and stores information about individuals during the application and hiring process (electronic copies of resumes and hiring ranking are stored temporarily during the hiring phase), including standard HR information – Travel authorization and vouchers, passports and international travel forms (completed by the employee through the travel portal), information for security badging process (Contact information only and the employee completes the badge application on paper forms which are taken to the NOAA Office of Security), and performance appraisal ranking.

NCCOS' employee data is collected, stored and maintained for internal COOP, Human Resources, and workforce planning purposes (federal employee/contractor).

NCCOS collects BII during the pre and post activities associated with the acquisition and management of contracts. The storage is in the form of PDF forms or MS Word documents.

There is no major application or database used to collect or store BII or employee PII information. NCCOS does not have a separate HR division since NCCOS utilizes the NOAA Workforce Management Office.

All information is stored on supervisors' and acquisition managers' restricted access file storage available only to the specific employee(s). Access is restricted to those on a need to know basis, by permissions settings and/or passwords. The data is access controlled when on a supervisor's desktop machine or file share; if stored on a supervisor's laptop, the data is encrypted since all mobile devices have full encryption.

A citation of the legal authority to collect PII and/or BII

The general legislation supporting the system is 5 U.S.C.301, one of the statutes concerning government organization and employees.

Additional authorities from DEPT-2, Accounts Receivable: H.R. 4613 (97th): *Debt Collection Act of 1982*, a bill to increase the efficiency of Government-wide efforts to collect debts owed the United States and to provide additional procedures for the collection of debts owed the United States and 5 U.S.C. 5701-09; 31 U.S.C. 951-953, 4

CFR 102.4, FPMR 101-7; Treasury Fiscal Requirements Manual.

Additional authorities from GSA/GOVT-9, System for Award Management: Federal Acquisition Regulation (FAR) Subparts 4.11 and 52.204, and 40 U.S.C. 121(c), Regulations by Administrator. For the Entity Management functional area of Systems Award Management, the authorities for collecting the information and maintaining the system are the Federal Acquisition Regulation (FAR) Subparts 4.11 and 52.204 and 2 CFR, Subtitle A, Chapter I, and Part 25, as well as 40 U.S.C. 121(c). For the exclusions portion of the Performance Information functional area, the authorities for collecting the information and maintaining the system are FAR Subparts 9.4 and 28.2, Executive Order 12549 (February 18, 1986), Executive Order 12689 (August 16, 1989).

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.*
☒ 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

☐ 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 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)**: Rohit Munjal

MUNJAL.ROHIT.15009463
81

Digitally signed by
MUNJAL.ROHIT.1500946381
Date: 2019.04.01 08:36:45 -04'00'

Signature of ISSO or SO: _____ Date: _____


Name of **Information Technology Security Officer (ITSO)**: John D.Parker

Signature of ITSO: PARKER.JOHN.D.1365835914

Digitally signed by PARKER.JOHN.D.1365835914
Date: 2019.04.02 12:07:13 -04'00'

Date: _____

Name of **Authorizing Official (AO)**: Steven Thur

Signature of AO: 

Digitally signed by
THUR.STEVEN.M.1365841299
Date: 2019.04.02 14:10:41
-04'00'

Date: _____

Name of **Bureau Chief Privacy Officer (BCPO)**: Mark Graff

Signature of BCPO: GRAFF.MARK.HYRU
M.1514447892

Digitally signed by GRAFF.MARK.HYRU.1514447892
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=OTHER, cn=GRAFF.MARK.HYRU.1514447892
Date: 2019.04.25 11:57:36 -04'00'

Date: _____