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

**Privacy Threshold Analysis
for the
National Geodetic Survey General Support System
(NOAA6401)**

U.S. Department of Commerce Privacy Threshold Analysis

NOAA/National Geodetic Survey General Support System

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: *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) The National Geodetic Survey (NGS) operates as a general support system

b) NGS's primary facility is in Silver Spring, MD, with much smaller facilities <10 employees in: Norfolk, VA, Woodford, VA, Boulder CO, Longmont, CO.

c) NGS is part of NOAA under NOS Line Office which provides the infrastructure backbone to connect to the NOAA TIC. A small part of one of its products, CORS data, includes Interconnection Service Agreements with the United States Coast Guard and the Federal Aviation Administration.

d) The mission of the National Geodetic Survey (NGS) is to define, maintain and provide access to the National Spatial Reference System (NSRS) to meet our nation's economic, social, and environmental needs. NGS provides the framework for all positioning activities in the Nation. The foundational elements - latitude, longitude, elevation and shoreline information - contribute to informed decision making and impact a wide range of important activities including mapping and charting, flood risk determination, transportation, land use and ecosystem management. NGS' authoritative spatial data, models and tools are vital for the protection and management of natural and manmade resources and support the economic prosperity and environmental health of the Nation.

e) All IT resources needed to support this mission is provided by the General Support System (NOAA6401) and IT components include: servers, printers, mobile devices, applications, storage devices, network devices, applications and publicly facing webservers.

f) The principal products and services created by NGS involve collection, computation and distribution of: geodetic data (GNSS, terrestrial levelling, gravity etc.) and associated

metadata, coordinates of points/benchmarks, imagery of coastlines using a variety of sensors.

g) User Types within NOAA6401

User Type	Employer	Type of Data
Authenticated Users	Federal & contractors (On-site)	Access to all data based on assigned Roles and Responsibilities
Supervisors	Federal, (On-site)	Access to all data based on assigned Roles and Responsibilities
IT Services staff (Administrators)	Federal & contractors (On-site)	Access to all data based on assigned Roles and Responsibilities.
Developers	Federal & contractors (On-site)	Access to specific development, staging, and production data
Web Visitors	Public	Access to mission data published on public websites

h) Internal authenticated users can retrieve data based on their assigned Roles and Responsibilities. NGS products and services are accessed by the public via geodesy.noaa.gov, vdatum.noaa.gov, storms.noaa.gov

i) All internal users access the NOAA Trusted Campus Network and NOS Line Office infrastructure backbone using CAC authenticated access. Any sensitive information that needs to be exchanged between individuals either within or outside of NOAA6401 is transmitted using the DOC Accellion software. Only approved products and services are distributed to the public via publicly facing websites.

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.*

☒   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.*

        NGS collects aerial imagery to support its mission, using both aircraft and sUASs. We have video a surveillance system for physical security purposes at our Norfolk, VA facility.

   ☐   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
        NOAA6401 collects and stores limited BII from businesses or other entities that are providing proprietary information in support of a grant application or federal acquisition actions. Occasionally this is financial information included with the acquisition package

   ☐   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. *NOAA6401 stores PII on an ad-hoc basis as part of the application and hiring of employees, and the processing of HR data about employees. Electronic copies of resumes and hiring ranking are stored temporarily during the hiring phase; in addition, the system stores COOP information, travel authorization and vouchers, passports and international travel forms, information for the security badging process, and performance appraisal ranking. External data providers and/or customers may voluntarily share one or more of the following information types: name, telephone number and/or email address to facilitate coordination with them.*

_____ 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

☒ I certify the criteria implied by one or more of the questions above **apply** to the National Geodetic Survey General Support System 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 Geodetic Survey General Support System and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

Name of Information System Security Officer (ISSO) or System Owner (SO): Giovanni Sella (ISSO)

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Signature of ISSO or SO: _____

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

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Name of Authorizing Official (AO): Juliana Blackwell

Juliana P. Blackwell
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Name of Bureau Chief Privacy Officer (BCPO): Mark Graff

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Signature of BCPO: _____