

**U.S. Department of Commerce
National Institute of Standards and Technology
(NIST)**



**Privacy Threshold Analysis
for the
184-12 Infrastructure Services System**

U.S. Department of Commerce Privacy Threshold Analysis
National Institute of Standards and Technology (NIST)

Unique Project Identifier: 184-12

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 (in a way that a non-technical person can understand) of the information system that addresses the following elements:*

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) *Whether it is a general support system, major application, or other type of system*
- b) *System location*
- c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*
- d) *The purpose that the system is designed to serve*
- e) *The way the system operates to achieve the purpose*
- f) *A general description of the type of information collected, maintained, use, or disseminated by the system*
- g) *Identify individuals who have access to information on the system*
- h) *How information in the system is retrieved by the user*
- i) *How information is transmitted to and from the system*

a. Whether it is a general support system, major application, or other type of system
The NIST Infrastructure Services System is a general support system.

b. System location
The component is located at the NIST Gaithersburg, Maryland facility within the continental United States.

c. Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)
The NIST Infrastructure Services System is a standalone system.

d. The purpose that the system is designed to serve

The purpose of the Content Collaboration component is to enable NIST to securely exchange information with the public using either a secure file transfer mechanism or a collaborative workspace.

e. The way the system operates to achieve the purpose

The following is an example of a transaction using the Content Collaboration component:

Exchange sensitive information when an authorized staff member invites a member of the public to either post or download the information.

f. A general description of the type of information collected, maintained, use, or disseminated by the system

The Content Component enables NIST staff to securely exchange sensitive information with the public, which may include Business and Personally Identifiable Information.

g. Identify individuals who have access to information on the system

NIST staff are authorized users who have access to use the Content Collaboration component. Access for non-NIST staff requires invitation from an authorized staff member to that individual.

h. How information in the system is retrieved by the user

The initiating user must extend an invitation to another user to access and download information or utilize collaborative workspace.

i. How information is transmitted to and from the system

Information is transmitted to and from the system through user transactions. A typical transaction enables an authorized user to securely exchange information using either a secure file transfer mechanism or a collaborative workspace.

Questionnaire:

1. The status of this information system:

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 01-2017 or later).

Changes That Create New Privacy Risks (CTCNPR)
Other changes that create new privacy risks:

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.

Activities
Other activities which may raise privacy concerns:

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.)”

4. Personally Identifiable Information (PII)

- 4a. Does the IT system collect, maintain, or disseminate personally identifiable information (PII)?

As per OMB 17-12: “The term PII refers to information that can be used to distinguish or trace an individual’s identity either alone or when combined with other information that is linked or linkable to a specific individual.”

The IT system collects, maintains, or disseminates PII about:

If the answer is “yes” to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

4d. 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.

Is a PIA Required?	Yes
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If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are “Yes,” a Privacy Impact Assessment (PIA) must be completed for the IT system. This PIA and the approved PIA must be a part of the IT system’s Assessment and Authorization Package.

