

**U.S. Department of Commerce  
National Oceanic & Atmospheric Administration**



**Privacy Threshold Analysis  
for the  
NOAA4700  
Alaska Region**

## U.S. Department of Commerce Privacy Threshold Analysis

### NOAA/NMFS/Alaska Region

**Unique Project Identifier: NOAA4700**

**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*

The NMFS Alaska Region Local Area Network (LAN) NOAA4700 is one of NOAA’s general support systems (GSS), an interconnected information resource under direct management control with shared common functionality. NOAA4700 is a GSS that supports the AKR’s mission with the following major applications: office automation; public interface via the Internet; and fisheries information management, including permits and catch accounting.

b) *System location*

Alaska Region has three offices located in the following locations  
Juneau Federal Building - Juneau, Ak  
Anchorage Federal Building - Anchorage, AK  
Remote Office, Dutch Harbor - AK

c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*

Alaska Region has interconnect agreements with the following:

- Elandings application

- NOAA4000 – eDiscovery Application
- NOAA4000 – Enterprise Storage Area Network (SAN)
- NOAA4000 – Fisheries WAN and Enterprise Services
- NOAA4000 – OLE Headquarters
- NOAA4000 – UDC37J National Permit System – BOF Site
- NOAA4800 – Alaska Fisheries Science Center (AKFSC) Network
- NOAA4020, Science and Technology, Network encryption
- NOAA4600, NOAA Seattle Local Area Network, Network encryption

d) *The purpose that the system is designed to serve*

**Permitting:** In order to manage U.S. fisheries, the NOAA Fisheries requires the use of permits or registrations by participants in the United States. Information in the NOAA4700 system consists of contents of permit applications and related documents, such as permit transfers and percentage of ownership in a corporation. A typical transaction is an initial or renewal permit application: the permit holder or applicant completes an application downloaded from the AKR website, submits it to the AKR by mail, along with any required supporting documentation and/or required fee payment, and receives a new permit once approved by the AKR. AKR also provides the option of online submission of permit applications and related information, via secure web pages. Note: submission by mail cannot immediately be eliminated, as the option is included in the applicable regulations.

**Personnel/Contracting:** In the course of daily business, the following information is routinely collected and maintained on AKR federal employees and contractors:

This information is used for:

- Security investigations
- Federal employee personnel actions
- Federal employee performance reviews
- Federal employee payroll
- Federal employee awards
- HSPD-12 Common Access Cards
- Recall and notifications for continuity planning
- Incident response plan and outage notification/escalation
- Account management processes  
(i.e. Requesting accounts, approving accounts, terminating accounts etc.)
- NOAA Staff Directory

**Strandings:** The AKR collects and compiles data about marine mammal strandings throughout Alaska. The network is composed of state and federal wildlife and fisheries agencies, veterinary clinics, Alaska Native organizations, academic institutions, and individuals who respond to or provide professional advice on handling strandings.

e) *The way the system operates to achieve the purpose*

**Personnel/Contracting:**

In the course of daily business, the following information is routinely collected and maintained on AKR federal employees and contractors:

- Employee/Contractor Name
- Address
- Date of birth
- Social Security Number
- Business Email
- Business Address
- Business Phone Number
- Alternate phone number (i.e. cell phone)

This information is used for:

- Security investigations
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Information collected includes:

- Name
- Telephone Number
- Email

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immediately be eliminated, as the option is included in the applicable regulations.

The following information may be collected:

- Name
- Address
- Date of birth
- Social Security Number/Tax Identification Number
- Marriage certificates
- Divorce decrees
- Death certificates
- Vessel name

f) *A general description of the type of information collected, maintained, used, or disseminated by the system*

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*g) Identify individuals who have access to information on the system*

Various users have access to the information on the system according to need

**Personnel/Contracting:**

The information is shared with NOAA Fisheries, the Office of Personnel Management, the Department of Commerce (DOC) Office of Security, the Defense Enrollment Eligibility Reporting System (DEERS), and the Real-Time Automated Personnel Identification System (RAPIDS).

**Permitting:**

Information is shared within the AKR in order to coordinate monitoring and management of sustainability of fisheries and protected resources. Sources of information include the permit applicant/holder, other NMFS offices, the U.S. Coast Guard, and the Pacific States Marine Fisheries Commission (PSMFC).

Information may also be disclosed:

- At the state or interstate level within the PSMFC for the purpose of co-managing a fishery or for making determinations about eligibility for permits when state data are all or part of the basis for the permits.

- To the North Pacific Fishery Management Council staff and contractors tasked with development of analyses to support Council decisions about Fishery Management Programs.
- To the International Pacific Halibut Commission (IPHC) for the purposes of identifying current permit owners and vessels pursuant to applicable statutes or regulations and/or conservation and management measures adopted by the IPHC.
- To the public: Vessel Owner Name, Name of Vessel and Permit Number are made publically available through our website. Notice of this is given on the permit application.
- We also allow other regions, centers and state organizations access to the publically available information directly from our database through a secure connection. This information is considered part of the public domain.

**Stranding:**

Strandings information may be shared with members of the AKR Strandings Network including:

- Alaska
  - Alaska Consortium of Zooarchaeologists
  - Alaska Department of Fish and Game
  - Alaska Sea Grant Marine Advisory Program
  - Alaska Sealife Center
  - Alaska Veterinary Pathology Services
  - The Alaska Whale Foundation
  - Aleut Community of St. Paul and Fur Seal Disentanglement Project
  - Rachel Bergartt, DVM
  - Chicago Conservation Council
  - Glacier Bay National Park and Preserve
  - NOAA Fisheries Alaska Region
  - North Slope Borough
  - The Petersburg Marine Mammal Center
  - Sitka Sound Science Center
  - University of Alaska Southeast, Juneau
  - University of Alaska Southeast, Sitka
  - University of Alaska Fairbanks, Marine Advisory Program
  - University of Alaska Fairbanks, Museum of the North
  - U.S. Fish and Wildlife Service, Alaska Region
  - U.S. Forest Service, Alaska
- National
  - Marine Mammal Health and Stranding Response Program
  - Prescott Marine Mammal Rescue Assistance Grant Program
  - Unusual Marine Mammal Mortality Events WorkingGroup
- Research
  - National Marine Mammal Laboratory
- University of Alaska Museum Specimen Database (external website)

*h) How information in the system is retrieved by the user*

Information is retrieved by the user using a combination of Database Links, Web Based Applications, and File Format Applications (\*Word, Excel, Etc.) over the NOAA4700 system and various web access applications available via the Internet.

i) *How information is transmitted to and from the system*

Information is transmitted across approved encryption protocols such as HTTPS, SSH, and SSL. Sensitive data transmissions are encrypted according to NIST 800-18, Federal Information Processing Standards (FIPS) 186, Digital Signature Standard and FIPS 180-1, and Secure Hash Standard issued by NIST when necessary.

**Questionnaire:**

1. Status of the Information System

1a. 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 01-2017). *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 01-2019 or later). *Skip questions and complete certification.*



1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

- Yes. This is a new information system.
- Yes. This is an existing information system for which an amended contract is needed.
- No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.
- No. This is not a new information system.

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. *(Check all that apply.)*

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

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.

No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate 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.”

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

- DOC employees
- Contractors working on behalf of DOC
- Other Federal Government personnel
- 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 Social Security numbers (SSNs), including truncated form?

Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

Social Security and tax identification numbers as well as employee ID are all required for the hiring and employment process in order to conduct background checks, issue ID, and file proper tax documents for the Federal Employee or Contractor.

Social Security numbers and tax identification numbers (TIN) allow positive identification for cost recovery billing of IFQ holders. Also, as stated in COMMERCE/NOAA-19, a TIN is required on all permit applications other than research or exempted fishing permits, under the authority 31 U.S.C. 7701. For purposes of administering the various NMFS fisheries permit and registration programs, a person shall be considered to be doing business with a Federal agency including, but not limited to, if the person is an applicant for, or recipient of, a Federal license, permit, right-of-way, grant, or benefit payment administered by the agency or insurance administered by the agency pursuant to subsection (c) (2) (B) of this statute.

<p>Provide the legal authority which permits the collection of SSNs, including truncated form.</p> <p>5 U.S.C. 1301 The authority for the mandatory collection of the Tax Identification Number is 31 U.S.C. 7701. The existing Privacy Act System of records for DEPT-18 Employees Personnel Files Not Covered by Notices of Agencies.</p> <p>Permitting: <a href="#">COMMERCE/NOAA-19</a>, Permits and Registrations for United States Federally Regulated Fisheries.</p>

No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. 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.

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.

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, 4c, and/or 4d are “Yes,” a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the SAOP 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 NOAA4700 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 NOAA4700 and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

<p><b>Information System Security Officer or System Owner</b>  Name: Daniel Rothman  Office: NMFS-AKR  Phone: (907) 586-7095  Email: Daniel.Rothman@noaa.gov</p> <p>Signature: <u>ROTHMAN.DA</u>  <small>Digitally signed by ROTHMAN.DANIEL.ROBER T.1262935724</small>  <del>NIEL.ROBERT.1</del>  Date signed: <u>262935724</u>  <small>Date: 2020.12.08 16:27:27 -09'00'</small></p>	<p><b>Information Technology Security Officer</b>  Name: Catherine Amores  Office: NMFS  Phone: (301) 427-8871  Email: Catherine.Amores@noaa.gov</p> <p>Signature: <u>AMORES.CATHERI</u>  <small>Digitally signed by AMORES.CATHERINE.SOLEDAD. 1541314390</small>  <del>NE.SOLEDAD.1541</del>  Date signed: <u>314390</u>  <small>Date: 2021.01.13 18:04:25 -05'00'</small></p>
<p><b>Privacy Act Officer</b>  Name: Adrienne Thomas  Office: NOAA OCIO  Phone: 828-257-3148  Email: Adrienne.Thomas@noaa.gov</p> <p>Signature: <u>THOMAS.ADRIEN</u>  <small>Digitally signed by THOMAS.ADRIENNE.M.1365859600</small>  <del>NE.M.1365859600</del>  Date signed: _____  <small>Date: 2021.02.03 16:31:29 -06'00'</small></p>	<p><b>Authorizing Official</b>  Name: Doug Mecum  Office: NMFS-AKR  Phone: (907) 586-7221  Email: Doug.Mecum@noaa.gov</p> <p>Signature: <u>MECUM.ROBERT.D</u>  <small>Digitally signed by MECUM.ROBERT.DOUGLAS.1380</small>  <del>OUGLAS.13804479</del>  Date signed: <u>39</u>  <small>Date: 2020.12.09 12:34:47 -09'00'</small></p>
<p><b>Bureau Chief Privacy Officer</b>  Name: Mark Graff  Office: NOAA OCIO  Phone: 301-628-5658  Email: Mark.Graff@noaa.gov</p> <p>Signature: <u>GRAFF.MARK.</u>  <small>Digitally signed by GRAFF.MARK.HYRUM.15</small>  <del>HYRUM.15144</del>  Date signed: <u>47892</u>  <small>Date: 2021.03.08 13:05:03 -05'00'</small></p>	