

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



**Privacy Threshold Analysis
for the
NOAA4930
Southwest Fisheries Science Center (SWFSC)**

U.S. Department of Commerce Privacy Threshold Analysis
NOAA/NMFS/ Southwest Fisheries Science Center (SWFSC)

Unique Project Identifier: NOAA4930

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).

NOAA4930 is a General Support System supporting users consisting of scientific, administrative, and support staff distributed among the California cities/communities of La Jolla, Monterey, and Santa Cruz. There are a variety hardware platforms and operating systems interconnected on this network system. The systems are designed and configured to support the staff in meeting the agency scientific mission.

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 NOAA4930 system is a General Support System supporting approximately 350 users consisting of scientific, administrative, and support staff.

b) *System location*

The NOAA4930 system is comprised of the NOAA/NMFS Southwest Fisheries Science Center facilities located in the cities/communities of La Jolla, Santa Cruz and Monterey in the state of California.

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

The NOAA4930 system is interconnected with the NMFS WAN (NOAA4000) and NMFS Science & Technology (NOAA4020).

d) The purpose that the system is designed to serve

The NOAA4930 system is designed and configured to support the staff in meeting the agency mission in fisheries research, the management of local human resources and facilities.

e) The way the system operates to achieve the purpose

The operational system functions that are provided include:

- Network File Storage, Sharing, and Printing
- Internet Access
- NMFS Wide Area Network Connectivity
- Administrative Support Systems
- Scientific Database Access
- Scientific Statistical Data Analyses
- Geographic Information Systems
- Web Based Information Dissemination
- Telecommunications

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

The categories of data inputted, stored and processed include administrative, scientific, statistical, economic, research and development, and technical.

As a requirement of the Highly Migratory Species (HMS) Fisheries Management Plan (FMP) implemented in 2005, participants (captains of permitted vessels) in HMS fisheries in the Pacific arc required to submit logbook information on fishing activities. In addition, to monitor these fisheries and provide accurate catch estimates as required under the FMP and international obligations, landings information is collected and maintained. Biological and life history data are also collected and maintained to supplement stock assessment information used to assess and monitor fish stocks.

The logbook and landings data contain information that identifies fishery participants and contains information related to the business practices of those participants: Names, contact information, including work and home e-mail and mailing addresses and phone numbers, vessel and processor identifiers and sales information including dates, buyers, sellers, amounts and prices .

These data are submitted to the Southwest Fisheries Science Center (SWFSC), where the information is entered into a centralized Oracle database, in an encrypted table space, that is located and maintained at the National Marine Fisheries Service (NMFS) Office of Science and Technology in Silver Spring, Maryland. These data are maintained by SWFSC staff and summarized for reporting. Summarization of the data follows established business rules for maintaining confidentiality of the summaries. Any information obtained from fewer than three persons is further aggregated and combined with other data.

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

NOAA4930 information is accessed by NOAA4930 authorized personnel which can include employees, contractors, cooperative institute employees, students and volunteers.

Authorized users (NMFS employees and contractors) have access to the confidential logbook and landings information and access is controlled through database roles. All authorized users that access confidential information must sign a non-disclosure agreement that certifies that the user has read and understands NOAA Administrative Order on Confidentiality of Statistics (NAO 216-100). These non-disclosure agreements are maintained at SWFSC.

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

NOAA4930 information is retrieved via government furnished IT equipment after verifying authentication and authorization levels.

i) How information is transmitted to and from the system

NOAA4930 transmission is protected using defense in depth architecture. Particularly sensitive information is encrypted while in transmission.

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):					

X 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.

X 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.

<p>Provide an explanation for the business need requiring the collection of SSNs, including truncated form.</p> <p>The business need for this data is with personnel management – human resources. This information is required on forms for onboarding new hires.</p>
<p>Provide the legal authority which permits the collection of SSNs, including truncated form.</p> <p>OPM/GOVT-1, General Personnel Records</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 NOAA4930 system and as a consequence of this applicability, I will perform and document a PIA for this IT system.

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