

**U.S. Department of Commerce
Office of the Secretary**



**Privacy Impact Assessment
for the
Personal Property Management System (PPMS)**

Reviewed by: **Maria D. Dumas**, Bureau Chief Privacy Officer

- Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
 Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Lisa Martin
for Dr. Jennifer Goode
Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

06/28/2021
Date

**U.S. Department of Commerce Privacy Impact Assessment
Office of Administrative Programs/Personal Property Management System
(PPMS)**

Unique Project Identifier: PPMS is an EAS OS-059 Application

Introduction: System Description

Provide a description of the system that addresses the following elements:

The response must be written in plain language and be as comprehensive as necessary to describe the system.

(a) Whether it is a general support system, major application, or other type of system

- PPMS is a child system of the EAS application system boundary.

(b) System location

- The system is primarily managed by resources located at the CBS Solutions Center in Gaithersburg, MD. The system is physically located at the Federal Aviation Administration Data Center (DOT/FAA/ESC) in Oklahoma City, OK.

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

- PPMS has an interconnection with WEX Inc. GSS for the purpose of transmitting unidirectional data communication between these entities. PPMS accesses encrypted data within WEX, and retrieves data on a daily schedule. Additionally PPMS connects with the Census, NIST, and NOAA information systems. Each of these systems are fully assessed and authorized to operate by the respective Authorizing Officials.

(d) The way the system operates to achieve the purpose(s) identified in Section 4

- Personal Property Management System (PPMS) provides Department of Commerce (DOC) with a mechanism to ensure uniformity within and across the agency in the selection and management of personal property. PPMS provide the critical information that DOC decision-makers require to purchase, transfer, dispose/excess, and depreciate personal property. Sunflower Systems offer an integrated software suite that provides property managers the ability to monitor, control and account for all property transactions. Sunflower's mobile solutions for receiving, physical inventory, shipping, and excess management simplify property processes by bringing asset data to a handheld device. Sunflower Assets System controls asset management tasks by managing physical and financial accountability in a single web-based system. Portable scanners are utilized in international offices in order to allow a user to modify an asset. The scanners connect to the user's desktop which allows them to access the record associated with a piece of property. The user then enters the information into the database. The DOC has implemented a Fleet Management Information System to manage its fleet of approximately 3,000 vehicles worldwide. The majority of vehicles are already entered in DOC's Sunflower Personal Property Management System (PPMS), to track them as

personal property assets. DOC also owns the Sunflower Federal Automotive Statistical Tool (FAST) Solution. Sunflowers standard functionality coupled with the FAST Solution provides the Department with the necessary software components to implement a Fleet Management Solution. PPMS also fulfills all Federal government regulations for Real Property. These business rules and regulations are established by the General Services Administration (GSA), the Federal Real Property Council (FRPC), and the General Accounting Office (GAO). These rules and regulations address GSA rent, depreciation, clean-up amortization, deferred maintenance and annual reporting of real property. PPMS provides the Department of Commerce (DOC) with an automated data management inventory system for its real property holdings. It was designed to promote improved real property accountability and to assist in the more efficient and economical use of the DOC's real property assets.

(e) How information in the system is retrieved by the user

- Users are able to account for and manage their assets from the time of acquisition through disposal. A complete history is maintained as records are easily updated to reflect any changes (location, user, value, etc.). Users may also generate reports to view assets. Once assets are disposed and a final event is created, a history of the assets remain in the system for reporting purposes in the future.

(f) How information is transmitted to and from the system

- Data is transferred into the DOC enclave and assimilated to the PPMS Development, Test, and Production environments. For the reports from CitiBank, a direct connection is made each month to a CitiBank database server. The reports are then pulled into the PPMS environments from the database server. These files are transferred via SFTP using a Secure Shell (SSH) tunnel encrypted with an RSA token.

(g) Any information sharing conducted by the system

- In support of the Fleet implementation, PPMS requires files from two external entities. On a daily basis, reports are delivered to PPMS from CitiBank. On a monthly basis, reports are delivered to PPMS from the General Services Administration (GSA) inventory. For the GSA reports, the reports are delivered to an external facing server at the Department of Transportation / Federal Aviation Administration / Enterprise Services Center (DOT/FAA/ESC) over Secure File Transfer Protocol (SFTP). The files are then brought through the DOT/FAA/ESC external firewall to an internal server over File Transfer Protocol (FTP).

(h) The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information

- Includes the following, with all revisions and amendments: 5 U.S.C. 301; 44 U.S.C. 3101; E.O. 12107, E.O. 13164, 41 U.S.C. 433(d); 5 U.S.C. 5379; 5 CFR Part 537; DAO 202-957; E.O. 12656; Federal Preparedness Circular (FPC) 65, July 26, 1999; DAO 210-110; Executive Order 12564; Public Law 100-71, dated July 11, 1987.

- The Consolidated Omnibus Budget Reconciliation Act of 1986, Sections 15301 and 15302 require federal executive agencies (Pub. L. No. 99-272) (40 U.S.C. Sec. 17502 and 17503) to have a centralized system to identify, collect, and analyze motor vehicle data with respect to all costs incurred for the operation, maintenance, acquisition, and disposition of motor vehicles. To help mitigate deficiencies, respond to significant deficiencies noted in the OIG Audit dated September 2010, and comply with GSA Bulletin FMR B-15 and Presidential Memorandum on Federal Fleet Performance, dated May 24, 2011

(i) *The Federal Information Processing Standards (FIPS) 199 security impact category for the system*

- PPMS is a part of EAS OS-059, which is categorized as MODERATE.

Section 1: Status of the Information System

1.1 Indicate whether the information system is a new or existing system.

- This is a new information system.
- This is an existing information system with changes that create new privacy risks.
(Check all that apply.)

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.
- 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).
- 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).

Section 2: Information in the System

2.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. (Check all that apply.)

Identifying Numbers (IN)					
a. Social Security*		f. Driver's License		j. Financial Account	
b. Taxpayer ID		g. Passport		k. Financial Transaction	X
c. Employer ID		h. Alien Registration		l. Vehicle Identifier	
d. Employee ID		i. Credit Card	X	m. Medical Record	
e. File/Case ID					
n. Other identifying numbers (specify):					
*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	X	h. Date of Birth		o. Financial Information	
b. Maiden Name		i. Place of Birth		p. Medical Information	
c. Alias		j. Home Address		q. Military Service	
d. Gender		k. Telephone Number	X	r. Criminal Record	
e. Age		l. Email Address	X	s. Physical Characteristics	
f. Race/Ethnicity		m. Education		t. Mother's Maiden Name	
g. Citizenship		n. Religion			
u. Other general personal data (specify):					

Work-Related Data (WRD)					
a. Occupation	X	e. Work Email Address		i. Business Associates	
b. Job Title	X	f. Salary		j. Proprietary or Business Information	
c. Work Address	X	g. Work History		k. Procurement/contracting records	
d. Work Telephone Number		h. Employment Performance Ratings or other Performance Information			
l. Other work-related data (specify):					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints		f. Scars, Marks, Tattoos		k. Signatures	
b. Palm Prints		g. Hair Color		l. Vascular Scans	
c. Voice/Audio Recording		h. Eye Color		m. DNA Sample or Profile	
d. Video Recording		i. Height		n. Retina/Iris Scans	
e. Photographs		j. Weight		o. Dental Profile	
p. Other distinguishing features/biometrics (specify):					

System Administration/Audit Data (SAAD)					
a. User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	
b. IP Address	X	f. Queries Run		f. Contents of Files	
g. Other system administration/audit data (specify):					

Other Information (specify)					

2.2 Indicate sources of the PII/BII in the system. *(Check all that apply.)*

Directly from Individual about Whom the Information Pertains					
In Person		Hard Copy: Mail/Fax		Online	
Telephone		Email			
Other (specify):					

Government Sources					
Within the Bureau	X	Other DOC Bureaus	X	Other Federal Agencies	
State, Local, Tribal		Foreign			
Other (specify):					

Non-government Sources					
Public Organizations		Private Sector		Commercial Data Brokers	
Third Party Website or Application					
Other (specify):					

2.3 Describe how the accuracy of the information in the system is ensured.

Data validation controls are in place in order to ensure the appropriate format is utilized. Users have the ability to review their information via the annual inventory process.

2.4 Is the information covered by the Paperwork Reduction Act?

	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
X	No, the information is not covered by the Paperwork Reduction Act.

2.5 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. (Check all that apply.)

Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)			
Smart Cards		Biometrics	
Caller-ID		Personal Identity Verification (PIV) Cards	
Other (specify):			

X	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
---	--

Section 3: System Supported Activities

3.1 Indicate IT system supported activities which raise privacy risks/concerns. (Check all that apply.)

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

X	There are not any IT system supported activities which raise privacy risks/concerns.
---	--

Section 4: Purpose of the System

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. (Check all that apply.)

Purpose			
For a Computer Matching Program		For administering human resources programs	
For administrative matters	X	To promote information sharing initiatives	
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
To improve Federal services online		For employee or customer satisfaction	
For web measurement and customization technologies (single-session)		For web measurement and customization technologies (multi-session)	
Other (specify):			

Section 5: Use of the Information

5.1 In the context of functional areas (business processes, missions, operations, etc.) supported by the IT system, describe how the PII/BII that is collected, maintained, or disseminated will be used. Indicate if the PII/BII identified in Section 2.1 of this document is in reference to a federal employee/contractor, member of the public, foreign national, visitor or other (specify).

The PII identified in Section 2.1 is in reference to federal employees and contractors/associates in connection with their working relationship with BEA, BIS, Census, EDA, ESA, ITA, MBDA, NIST, NOAA, NTIA, and NTIS. The data will be used for purposes of providing access to delivering better services, and for carrying out of property and asset management activities. User information will be transferred securely from the bureaus to PPMS for more accurate user and account administration.

5.2 Describe any potential threats to privacy, such as insider threat, as a result of the bureau’s/operating unit’s use of the information, and controls that the bureau/operating unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

The potential threat to privacy as a result of use of the information is insider threat. The data is maintained for a period of 6 years. Annual Cybersecurity and Privacy Awareness Training is conducted in order to communicate the appropriate procedures for handling and dispensing of information. All users are required to sign the Rules of Behavior, which outline the data protection requirements, prior to being granted access to the application, annually, and whenever the rules have been updated.

Section 6: Information Sharing and Access

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. *(Check all that apply.)*

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau			X
DOC bureaus			X
Federal agencies			
State, local, tribal gov't agencies			
Public			
Private sector			
Foreign governments			
Foreign entities			
Other (specify):			

	The PII/BII in the system will not be shared.
--	---

6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
X	No, the bureau/operating unit does not share PII/BII with external agencies/entities.

6.3 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

X	Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: Census: BOC CBS, Single Sign On NIST: Webservice, Single Sign On, SFTP NOAA: LDAP, & Staff Directory WEX: Global Access Control, SFTP All systems are fully assessed and authorized to operate by Authorizing Officials at the respective bureaus.
	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.4 Identify the class of users who will have access to the IT system and the PII/BII. (Check all that apply.)

Class of Users			
General Public		Government Employees	X
Contractors	X		
Other (specify):			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. (Check all that apply.)

X	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: _____.	
	Yes, notice is provided by other means.	Specify how:
	No, notice is not provided.	Specify why not:

7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how:
X	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: It is required under Property Bulletin #005, FY10# for import of BII information.

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
X	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: It is required under Property Bulletin #005, FY10# for import of BII information.

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

X	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how: Individuals have an opportunity to review the PII/BII information via the annual inventory process.
	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

Section 8: Administrative and Technological Controls

8.1 Indicate the administrative and technological controls for the system. (Check all that apply.)

	All users signed a confidentiality agreement or non-disclosure agreement.
X	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
X	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
X	Access to the PII/BII is restricted to authorized personnel only.
X	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: Access to PII/BII is restricted to those roles that require the information to support their job functionality.
X	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): <u>8/8/2020</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
X	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
X	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M).

X	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
X	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
X	Contracts with customers establish DOC ownership rights over data including PII/BII.
X	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
	Other (specify):

8.2 Provide a general description of the technologies used to protect PII/BII on the IT system. (Include data encryption in transit and/or at rest, if applicable).

The user administration data that is transferred to PPMS is sent as an XML file over SFTP. Unauthorized use of the system is restricted by user authentication. PPMS is not a public facing system and can only be accessed from a DOC network as an authenticated user. Access logs are kept and reviewed for any anomalies. The servers are located at DOT/ESC/FAA where PPMS resides, and are maintained by administrators that configure the servers to be in a secure state as part of the service level agreement (SLA) between DOC and DOT/ESC/FAA. In addition, servers are in a physically secure room with access by specific designated personnel, to limit the possibility of unauthorized physical modification or damage.

Section 9: Privacy Act

9.1 Is the PII/BII searchable by a personal identifier (e.g., name or Social Security number)?

X Yes, the PII/BII is searchable by a personal identifier.

_____ No, the PII/BII is not searchable by a personal identifier.

9.2 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C. § 552a. (A new system of records notice (SORN) is required if the system is not covered by an existing SORN).

As per the Privacy Act of 1974, “the term ‘system of records’ means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”

X	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. (list all that apply): Employees Personnel Files Not Covered by Notices of Other Agencies-COMMERCE/DEPT-18. http://osec.doc.gov/opog/PrivacyAct/SORNs/DEPT-18.html Property Accountability Files -SORN COMMERCE/DEPT-16. http://osec.doc.gov/opog/PrivacyAct/SORNs/DEPT-16.html
	Yes, a SORN has been submitted to the Department for approval on (date).
	No, this system is not a system of records and a SORN is not applicable.

Section 10: Retention of Information

10.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. *(Check all that apply.)*

X	There is an approved record control schedule. Provide the name of the record control schedule: General Records Schedules (GRS) 5, Item 2
	No, there is not an approved record control schedule. Provide the stage in which the project is in developing and submitting a records control schedule:
X	Yes, retention is monitored for compliance to the schedule.
	No, retention is not monitored for compliance to the schedule. Provide explanation:

10.2 Indicate the disposal method of the PII/BII. *(Check all that apply.)*

Disposal			
Shredding	X	Overwriting	X
Degaussing		Deleting	X
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Level

11.1 Indicate the potential impact that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed. *(The PII Confidentiality Impact Level is not the same, and does not have to be the same, as the Federal Information Processing Standards (FIPS) 199 security impact category.)*

	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
X	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
	High – the loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.

11.2 Indicate which factors were used to determine the above PII confidentiality impact level. *(Check all that apply.)*

X	Identifiability	Provide explanation: Information regarding users only includes the information in regards to their status as a Commerce employee. A Majority of the information can be found publicly online using the Commerce Employee Directory
	Quantity of PII	Provide explanation:
X	Data Field Sensitivity	Provide explanation: Information regarding users only includes the information in regards to their status as a Commerce employee. A Majority of the information can be found publicly online using the

		Commerce Employee Directory
X	Context of Use	Provide explanation: Information used to ease administration and authentication of PPMS users
	Obligation to Protect Confidentiality	Provide explanation:
	Access to and Location of PII	Provide explanation:
	Other:	Provide explanation:

Section 12: Analysis

12.1 Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

No potential threats to privacy were discovered. However, The potential threat to privacy as a result of use of the information is insider threat. Cybersecurity and Privacy Awareness Training are required for all DOC employees and will help mitigate this threat.
--

12.2 Indicate whether the conduct of this PIA results in any required business process changes.

	Yes, the conduct of this PIA results in required business process changes. Explanation:
X	No, the conduct of this PIA does not result in any required business process changes.

12.3 Indicate whether the conduct of this PIA results in any required technology changes.

	Yes, the conduct of this PIA results in required technology changes. Explanation:
X	No, the conduct of this PIA does not result in any required technology changes.