

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



**Privacy Threshold Analysis  
for the  
NOAA4800  
Alaska Fisheries Science Center (AKFSC) Network**

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

### NOAA/NMFS/Alaska Fisheries Science Center (AKFSC) Network

#### Unique Project Identifier: NOAA4800

**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:** The NOAA4800 system consists of a series of Local Area Networks (LANs) connected via a shared Wide Area Network (WAN) connection. The LANs are separated from the WAN by a firewall and router. Via the system identified as NOAA4000, NMFS CIO staff manage the WAN and all of the firewalls except for the Seattle LAN firewall. A common Active Directory, managed by the NMFS Enterprise Active Directory staff, binds the LANs into one system. See diagram below. Three programs with privacy-related data within the system are:

North Pacific (NORPAC) Database (Observer Data): NORPAC refers to the observer data collection within the North Pacific by the Fisheries Management and Analysis (FMA) division within NOAA4800. In the past, it was referred to simply as the Observer Database. It is not a true acronym. The database consists of various data collected by fishery biologists while deployed on board commercial fishing vessels or at shoreside processing plants participating in the Bering Sea and Gulf of Alaska groundfish fisheries. Data collection activities began in 1973 and they continue to date. While deployed at their assignments, observers collect data on the catch size, fishing locations, catch composition, length frequencies, age structures, marine mammal interactions, and a variety of research projects. The specific data components collected are outlined in the Groundfish Observer Manual. Once received by FMA, these data are extensively checked for quality and are then entered onto an Oracle database and made available to authorized staff. The database also stores observer training records and performance evaluations.

All of these data are collected cooperatively from private commercial fishing interests and are protected from general release by confidentiality statutes. This protects the private business interests of industry while still providing NOAA Fisheries with the detailed information necessary to effectively manage the ecosystem.

NMFS Groundfish Tagging Program: The collection of information for the National Marine Fisheries Service (NMFS) Groundfish Tagging Program has been in operation since the early 1970s. This information collection covers the Groundfish Tagging Program on the West Coast and Alaska. The NMFS Groundfish Tagging Program provides scientists with information necessary for effective conservation, management, and scientific understanding of the groundfish fishery

resources off Alaska. Data from the releases and recoveries that are collected through this program have been used to examine movement patterns, evaluate areal apportionment strategies of annual catch quota, validate ageing methods, and to examine growth.

When a tag is recovered, typical information given by the respondent is: (1) tag number, (2) date of capture, (3) location of capture, (4) size of fish, (5) sex of fish, (6) depth of capture, (7) gear type, (8) vessel name, and (9) name and address of reward recipient. The standard tag recovery form is attached to a prepaid business reply envelope. Individuals use this envelope to submit and record recovery information for each tag. Each recovery envelope contains a confidentiality statement. Submitting tag recovery information is voluntary, and the amount of information received can vary with each recovery.

Submitting tag recovery information is voluntary. Tags (recovery information) are generally collected from fishermen and processors. Tags can be sent in directly from these individuals, as well as from observers and port samplers with NMFS, the Alaska Department of Fish and Game (ADFG), and Canada Department of Fisheries and Oceans (DFO). Information sent in by NMFS observers includes the vessel captain's signature approving the collection and use of the provided data.

Economic Data Report (EDR) Dataset: The EDR data collection forms collect confidential business data on costs, revenues, ownership, employment, and physical plant characteristics from vessels, processors, and Quota Share permit holders licensed to participate in federally managed crab and groundfish fisheries in Alaska. In addition to business data, the forms also include name, title, telephone and fax numbers, and email address of the person submitting the EDR form; name and address of the owner or leaseholder of the vessel or plant; Federal Fishery processor or vessel permit number, Coast Guard vessel registration number, federal license number, Registered Crab Receiver number, State of Alaska seafood processor number, and Alaska Department of Fish & Game (ADF&G) Commercial Crew License or Commercial Fisheries Entry Commission (CFEC) Gear Operator Permit number of vessel crew members.

EDR data is collected on an annual basis from vessels, processors, and quota shareholders participating in selected catch share programs developed by North Pacific Fishery Management Council and administered by NMFS Alaska Regional Office, specifically, the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program, American Fisheries Act pollock fishery, Amendment 80 Non-pollock Groundfish Trawl fishery, and Gulf of Alaska groundfish trawl fisheries. To monitor changes in the economic performance of the affected fisheries following rationalization and subsequent management changes, the NPFMC developed the respective EDR data collections to provide analysts with economic information not available from other sources. The EDR data collections also contribute to meeting the requirements of the MSA for catch share program evaluation.

**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*

NOAA4800 is a General Support System.

b) *System location*

The primary site of NOAA4800 is Seattle, WA. Additional locations are Newport, OR, Juneau, AK, Anchorage, AK, Kodiak, AK, and 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)*

NOAA4800 is interconnected with the following systems:

NOAA4600: General Support System for the Northwest Fisheries Science Center

NOAA4700: General Support System for the Alaska Regional Office

NOAA4000: General Support System for NMFS Headquarters (this system connects all NMFS systems via a network backbone)

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

The purpose of the NOAA4800 system is to provide information storage and computational resources for NOAA Fisheries scientists.

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

In order to achieve its purpose, NOAA4800 provides connectivity between individual end-user computers to infrastructure devices such as files servers, through networking devices such as firewalls, routers, and switches.

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

NOAA4800 collects, maintains, and uses several types of information, including natural resource data (conservation, marine ecosystems, and mammals), administrative data (budget formulation, budget planning), general workforce management data (number of contractors, contracting budgets, etc.), and information technology data (help desk, infrastructure, system development, and security).

PII/BII stored within NOAA4800 is shared outside of NOAA with the following organizations:

-Alaska Department of Fish and Game (ADF&G)

-North Pacific Fishery Management Council (NPFMC)

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

A staff of approximately 500 people composed of biologists, physical scientists, administrative, and support professionals have general, non-administrative access to information on the NOAA4800 system. Information specifically designated as PII and/or BII is restricted and limited only to a select group of federal employees and contractors with a need to know.

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

Information is retrieved from servers to desktop and laptop computers via file sharing technologies.

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

Information is transmitted locally via file sharing protocols, and externally via NOAA4000.

**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.*

<b>Changes That Create New Privacy Risks (CTCNPR)</b>					
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.)*

<b>Activities</b>			
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.

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.

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 Alaska Fisheries Science Center (AKFSC) Network 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 Alaska Fisheries Science Center (AKFSC) Network and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

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