U.S. Department of Commerce National Telecommunications and Information Administration (NTIA)



Privacy Impact Assessment for the NTIA-013 NTIA ITS General Support System

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U.S. Department of Commerce Privacy Impact Assessment NTIA/NTIA-013 ITS GSS

Unique Project Identifier: NTIA-013

Introduction: System Description

The National Telecommunications and Information Administration 013 (NTIA-013) Institute for Telecommunication Sciences (ITS) general support system (GSS) is located in the Department of Commerce (DOC) Boulder Laboratories, Building 1 at 325 Broadway, Boulder, CO 80305. NTIA-013 has an interconnection through the National Oceanic and Atmospheric Administration (NOAA) Enterprise Network (N-Wave) for internet connectivity. The NTIA site in Gettysburg is designated as the emergency relocation site in case of disaster or emergency.

The purpose of the ITS GSS is to provide network services, collaboration services, internet/intranet connectivity, web-enabled applications, and office automation tools to users in an unclassified environment that ensures confidentiality, integrity, and availability. The technical support staff to the GSS is the ITS information technology (IT) team.

Most users of the GSS work with commercial off the shelf (COTS) software loaded onto their Windows or macOS workstation. As information is newly created, there is a need to share this data with other staff members. Users exchange data in various means:

- Printed form
- Email
- Digital collaboration platforms
- Websites
- File shares

The GSS maintains information access to government agency enterprise service providers' web sites such as United States Department of the Treasury HR Connect and United States Department of Agriculture (USDA) National Finance Center (NFC) in support of human resources (HR) and business functions.

Documentation is collected which contains personally identifiable information (PII) to support HR, personnel administration, and access to the Table Mountain field site. HR information is collected in person from individuals and any documentation containing sensitive PII is stored on an access-controlled file share limited to staff with a need to know, with auditing and malware scanning in place. Table Mountain access requests are submitted by the requestor through the approved and encrypted DOC solution, kiteworks by Accellion. Table Mountain access requests are printed on a non-networked printer, placed in a locked file cabinet, then forwarded through kiteworks by Accellion to the Seattle DOC security office for approval.

Per organizational procedure, PII is retained and used for business purposes only and is minimized as much as possible, with the printed Table Mountain access requests destroyed after the approval process and HR onboarding documentation containing PII deleted after receipt of the information from the DOC HR Operations Center (HROC), ensuring that all requirements for it have been met.

Documentation containing sensitive PII is only transmitted to the Seattle DOC security office and the DOC HROC through the approved and encrypted DOC solution, kiteworks by Accellion. Users are directed to report any incidents involving PII immediately, and any sensitive PII located outside of the authorized file share is securely deleted through data sanitization. Users are instructed to not complete fields on standard forms which contain PII that are not necessary for processing.

The legal authorities to collect and maintain PII are U.S. Code 1030, Computer Fraud and Abuse Act and Public Law 99-474, Counterfeit Access Device, Computer Fraud and Abuse Act of 1984, Federal Information Security Management Act (FISMA) Section 3544, 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 and Executive Orders 10450, 11478, 12065, 5 U.S.C. 44, 301, and 7531-332; 15 U.S.C. 1501 et. seq.; 28 U.S.C. 533-535; 44 U.S.C. 3101; and Equal Employment Act of 1972.

Web servers under the GSS that support NTIA enterprise applications collect and maintain non-sensitive PII, such as usernames, office phone numbers, and office email addresses for application and authentication purposes.

The NTIA-013 GSS protects the confidentiality and integrity of organizational sensitive information. NTIA ITS has implemented encryption on mobile devices and removable media to restrict and protect sensitive data at rest. In addition, other protection mechanisms are deployed such as security configuration settings, permission restrictions, anti-malware, system logging, and data monitoring tools.

The FIPS Publication (PUB) 199 security impact category of this system is moderate.

Section 1: Status of the Information System

1.1	idicate 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-	e. New Public Access	h. Internal Flow or			
Anonymous		Collection			
c. Significant System	f. Commercial Sources	i. Alteration in Character			

Management Changes		of Data	
j. Other changes that create no	ew privacy risks (speci	fy):	
risks, and there is no _X_ This is an existing in risks, and there is a S This is an existing in	ot a SAOP approved information system i SAOP approved Prinformation system i	in which changes do not create new pred Privacy Impact Assessment. in which changes do not create new predivacy Impact Assessment (version 01-in which changes do not create new predivacy Impact Assessment (version 01-ivacy Impact Assessment (version 01-ivacy Impact Assessment)	ivacy 2015). ivacy

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*	X	f. Driver's License	X	j. Financial Account	X
b. Taxpayer ID		g. Passport	X	k. Financial Transaction	
c. Employer ID		h. Alien Registration		Vehicle Identifier	
d. Employee ID		i. Credit Card		m. Medical Record	
e. File/Case ID					
e. File/Case ID	. (: 6				

n. Other identifying numbers (specify):

^{*}Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form: Required for processing HR actions and the access approval process for the Table Mountain field site

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

W	ork-Related Data (WRD)							
a.	Occupation	X	e.	Work Email Address	X	i.	Business Associates	
b.	Job Title	X	f.	Salary	X	j.	Proprietary or Business	
							Information	
c.	Work Address	X	g.	Work History	X			
d.	Work Telephone	X	h.	Employment	X			
	Number			Performance Ratings or				
				other Performance				
				Information				
k.	Other work-related data (sp	ecify):		·				

Di	Distinguishing Features/Biometrics (DFB)				
a.	Fingerprints	X	d. Photographs	X	g. DNA Profiles
b.	Palm Prints		e. Scars, Marks, Tattoos		h. Retina/Iris Scans
c.	Voice		f. Vascular Scan		i. Dental Profile
	Recording/Signatures				
į.	j. Other distinguishing features/biometrics (specify):				

Sys	stem Administration/Audit	t Data	(SAAD)			
a.	User ID	X	c. Date/Time of Access	X	e. ID Files Accessed	X
b.	IP Address	X	d. Queries Run	X	f. Contents of Files	X
g.	Other system administration	n/audi	t 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	X	Hard Copy: Mail/Fax	X	Online	
Telephone	X	Email	X		
Other (specify):					

Government Sources				
Within the Bureau	X	Other DOC Bureaus	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):			
(Special)			

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

As part of the HR onboarding and the Table Mountain access request processes, the information in the system is received directly from the subject/requestor, then is forwarded to the security department where they will perform security checks, requiring verification of the information.

PII is stored within a centralized file server that is encrypted with FIPS 140-2 cryptography to protect the integrity and confidentiality of the information. The ITS GSS does not contain any applications or databases that collect or process PII, information is only stored within files.

Information not part of the HR onboarding process and Table Mountain access request process is obtained by other FISMA Major Applications (MAs) where the information is received directly from the subject. This information is limited to the information on a System Access Authorization Request (SAAR) form (i.e., name, email address, phone number, and affiliation) and is not processed by the NTIA-013 ITS GSS, but only resides on it.

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	X
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		For web measurement and customization	
technologies (single-session)		technologies (multi-session)	
Other (specify):	•		
(-F)/			

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).
 - For administering HR programs: General personal data (GPD) and identifying numbers (IN) in section 2.1 are used for personnel management of NTIA ITS employees and contractors. Sensitive PII is used to assist with the HR process for personnel actions such as hiring, promotion, retirement, and employee in/out processing. PII is used in the security clearance process to determine if employees are eligible to handle NTIA sensitive materials.
 - For administrative matters: PII may be used for travel processes, transit subsidy program, acquisition processes, etc.
 - IN, GPD, and work-related data (WRD) for human resource management related purposes such as, hiring process, personnel management actions, government business travel, background check/security clearance, visit requests, access requests to the Table Mountain field site, etc.
 - System administration/audit data information: Admin or service account ID of employees or contractors and system log or audit data is used to support system access and network/system administration purposes.
- 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.)

Potential threats to the privacy of subjects from whom ITS collects PII could be an insider threat who intentionally leaks PII or a breach of the multiple levels of security controls that would allow a bad-actor to obtain the stored PII.

The ITS GSS has security controls and procedures in place that provide guidance and restrictions for the collection, storage, sharing, transmitting, faxing, printing, destruction of PII, and the reporting of security incidents involving PII.

Handling PII is restricted to ITS Division Chiefs, administrative personnel, and any other staff who are responsible for using it as part of official ITS business and mission processes.

Sensitive PII must be stored in a specific file share which has restricted access and security measures in place.

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*.)

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

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

X

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

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: National Finance Center, Office of Personnel Management (OPM / E-QIP and eOPF), HR Connect, webTA, and Carlson Wagonlit Travel/SATO Travel. All access to these enterprise services are managed

and approved by other Government agencies that are under the same FISMA compliance. Access to the secure websites are restricted by permissions and systems under the GSS are all covered with the technical controls described in Section 8.2 in this PIA.
No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.3 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		
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.		
X	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: the NTIA public website: https://www.ntia.gov		
	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.

X	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how: This is done by the DOC HROC hiring process and the Table Mountain access request process. Individuals may decline to provide PII information on the application or HR hiring documents but if required information is not provided, job application could be declined. On access request forms for the Table Mountain field site, requestors can decline to provide PII information, but if required information is not provided, access to the site could be declined.
	No, individuals do not have an opportunity to decline to provide	Specify why not:
	PII/BII.	

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

X	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how: This is done by the DOC HROC hiring process for the sensitive PII, written consent to only particular uses of PII must be submitted to the servicing HR specialist in DOC HROC. For non-sensitive PII, individuals are given an explanation as to why the required information is needed on the system access request form and in the instructions. They consent by signing the form. Declining may affect eligibilities or services. Consent is received from individuals for the use of photographs through Form I-9, Employment Eligibility Verification, as required by the Immigration Reform and
		Control Act of 1986.
	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

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: For the PII data collected by DOC HROC, PII is routinely updated as an employee's position changes by the servicing HR specialist in DOC HROC. Employees may request to review their information from and ask that it be updated through their supervisors. Updates are made by the servicing HR specialist or HR Connect manager.
	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.*)

X	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 is restricted only for employees and contractors with a "need to know" and can be	
	tracked and recorded by the system logs.	
	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements.	
X	Provide date of most recent Assessment and Authorization (A&A): 7/31/2019	
	☐ 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*).
 - Access Control: access provisioning, access/privileged account monitoring
 - Security configuration
 - Vulnerability scanning and remediation
 - Anti-malware, anti-spyware, and spam protection
 - Encryption on mobile devices and external drives
 - Secure file sharing
 - Malicious attack identification and blocking
 - Block and filter network traffic and malicious websites
 - The ITS GSS uses PIV cards for multifactor system access authentication, but does not collect or maintain the biometric data in the system

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."

Yes, this system is covered by an existing system of records notice (SORN).

Provide the SORN name, number, and link. (list all that apply):

COMMERCE/DEPT-1, Attendance, Leave, Payroll records.

COMMERCE/DEPT-5, FOIA requests.

COMMERCE/DEPT-9, Travel records.

COMMERCE/DEPT-10, Executive Correspondence Files.

COMMERCE/DEPT-18, Employees Personnel Files Not Covered by Noticed of Other Agencies.

OPM/GOVT-1 General Personnel Records.

OPM/GOVT-2 Employee Performance File System Records.

OPM/GOVT-3 Records of Adverse Actions, Performance Based Reduction in Grade and Removal Actions, and Termination of Probationers.

OPM/GOVT-5 Recruiting, Examining and Placement Records. OPM/GOVT-6 Personnel Research and Test Validation Records. OPM/GOVT-7 Applicant Race, Sex, National Origin, and Disability Status Records. OPM/GOVT-9 File on Position Classification Appeals, Job Grading Appeals, Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints.
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: NTIA Record Schedule, N1-417-10-1, approved by NARA on May 20, 2011.
	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	X	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 levels. (*Check all that apply.*)

X	Identifiability	Provide explanation: Documentation contains unique identifiers such as SSNs that could directly identify individuals.
X	Quantity of PII	Provide explanation: The number of affected records is sufficiently low to reduce risk.
	Data Field Sensitivity	Provide explanation:
X	Context of Use	Provide explanation: PII collected is for human resources and personnel administration use only and is stored in access controlled central locations.
	Obligation to Protect Confidentiality	Provide explanation:
X	Access to and Location of PII	Provide explanation: Documentation containing sensitive PII is stored in centralized access-controlled locations and is limited to only personnel with a need to know.
	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.)

The very minimal type and quantity of PII included on the access request form for access to the Table Mountain field site is provided by the requestor. It is only transmitted via the DOC approved and encrypted kiteworks by Accellion. Printed copies of the requests are stored in a locked file cabinet and destroyed after the approval process is complete. For the onboarding HR process, only the minimum type and quantity of PII required is obtained from the onboarding individual and resides on the GSS for the minimum length of time possible. Other PII that resides on the GSS is acquired by other FISMA MAs to comply with their access control requirements, and only resides on the GSS for the minimum amount of time required for use of the FISMA MA that acquired it and by law. The only threats to the privacy of the subjects for whom the PII was collected is a potential insider threat that could intentionally leak the information or a breach of the many security layers and controls allowing access to the stored PII. Neither of the potential threats to the privacy of the subjects is likely.

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

	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.

Points of Contact and Signatures

This page is for internal routing purposes and documentation of approvals. Upon final approval, this page must be removed prior to publication of the PIA.