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



Privacy Impact Assessment for the NOAA8883 National Weather Service Pacific Region (PR)

Reviewed by: Mark H. Graff, Bureau Chief Privacy Officer

☐ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Offic

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Date

U.S. Department of Commerce Privacy Impact Assessment NOAA / NWS / Pacific Region

Unique Project Identifier: NOAA8883 (PR)

Introduction: System Description

Provide a brief description of the information system.

The National Weather Service Pacific Region (NOAA8883/PR) is a general support system composed of various field and headquarter office local area networks and associated networked equipment used to provide information technology support to Federal weather forecasting operations throughout the Pacific Ocean. The system is primarily administrative support in function though in limited cases provides supplemental operational data.

Address the following elements:

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

General Support System

(b) System location

RHQ Pacific Region (Honolulu, HI), WFO Honolulu (Honolulu, HI), WFO Guam (Barrigada, GU), WSO Pago Pago (Pago Pago, AS), DCO Lihue (Lihue, HI), DCO Hilo (Hilo, HI), and the International Tsunami Information Center Caribbean (Mayaguez, PR).

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

The NWS PR interconnects with the Advanced Weather Interactive Processing System (AWIPS) (NOAA8107) to process and deliver non-Satellite Broadcast Network (SBN) data, the NWS Enterprise Mission Enabling System (NOAA8850) for centralized user authentication, National Oceanic and Atmospheric Administration Corporate Services (NOAA1200) for audit collection of automated information technology records such as computer application security logs, and the NWS Weather and Climate Computing Infrastructure Services (NOAA8860) as its WAN provider.

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

The NWS PR (FIMSA ID: NOAA8883) information technology general support system is composed of various field and headquarter office local area networks (LANs) and their directly connected information systems such as workstations, servers, printers, etc. which are linked together by a wide area network (WAN) used to support weather forecasting throughout the Pacific Ocean. The system is primarily used to provide administrative support (e.g. email, document creation/editing, spreadsheets, presentations, etc.) and supplemental operational services (e.g. weather briefs/presentations) and specifically excludes from its accreditation boundary systems deemed as major applications or programs of records (e.g. AWIPS) as well as various partner systems (e.g. satellite and observation data), though transit may be provided in some cases.

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

Users are identified and authenticated using DoD issued Common Access Card (CAC) and only with Government Furnished Equipment (GFE) computers. Their CACs and respective PIN are required to access the employee's Windows Domain account.

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

Information transmitted to and from the system is via the NOAA8883 N-Wave\TICAP system. If a data transmission involves a privacy consideration, a PR employee would use the DOC provided secure file transmission system. PR employee personnel recommend the DOC secure file transfer method as standard practice to receive sensitive data into the system.

(g) Any information sharing conducted by the system

Federal civil servants and private contractors under contract with the NWS working on behalf of the Pacific Region access parts of the system in support of its mission. Select PII is shared with Department of the Defense Joint Base Pearl Harbor-Hickam Pass and ID Office (e.g. alien registration, weight, height, hair color, eye color, and criminal record), the Department of Commerce Western Region Security Office, and various National Oceanic and Atmosphere Administration administrative offices such as Human Resources or Finance as applicable. Weather observation and climate data that is collected by NOAA8883 is shared with NOAA and its stakeholders.

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

	Type of Information Collected (Introduction h.)	Applicable SORNs (Section 9.2)	Programmatic Authorities (Introduction h.)
1.	Personnel Actions Including Training	COMMERCE/DEPT-1	31 U.S.C. 66a
			44 U.S.C. 3101, 3309
			Title 5 U.S.C.
		GSA/GOVT-7	5 U.S.C. 301
			Homeland Security Presidential Directive 12, Policy for a Common Identification Standard for Federal Employees and Contractors
			Federal Information Security Management Act of 2002 (44 U.S.C. 3554)
			E-Government Act of 2002 (Pub. L. 107–347, Sec. 203)
2.	Visitor Logs & Permits for Facilities	COMMERCE/DEPT-6	5 U.S.C. 301
	-		44 U.S.C. 3101
3.	Travel Records	COMMERCE/DEPT-9	Budget and Accounting Act of 1921
			Accounting and Auditing Act of 1950
			Federal Claim Collection Act of 1966
			FPMR 101-7
			5 U.S.C. 5701-09
4.	Personnel Actions Including Training	COMMERCE/DEPT-18	44 U.S.C. 3101
			Executive Orders 12107, 13164,
			41 U.S.C. 433(d)
			5 U.S.C. 5379
			5 CFR Part 537
			Executive Order 12564
			Public Law 100-71
			Executive Order 11246
			26 U.S.C. 3402
5.	System Administration/Audit Data (SAAD)	COMMERCE/DEPT-25	5 USC 301
			Homeland Security Presidential Directive 12, Policy for a Common Identification Standard for Federal Employees and Contractors

			Electronic Signatures in Global and National Commerce Act, Public Law 106-229
			28 U.S.C. 533-535
6.	Foreign National Information	COMMERCE/DEPT-27	28 U.S.C. 533-535
			44 U.S.C. 3101
			5 U.S.C. 301
			Executive Orders 13526, 12968, 13356, 13587
			Public Law 108-458 (Intelligence Reform and Terrorism Prevention Act of 2004)
			Intelligence Authorization Act for FY 2010, Public Law 111-259
			31 U.S.C. 951-953
			8 U.S.C. 1324a
			15 Code of Federal Regulations (CFR) Parts 730-774, Export Administration Regulations
			NOAA Administrative Order (NAO) 207-12 "Technology Controls and Foreign National Access"
			Department Administrative Order (DAO) 207- 12 Version Number: 01-2017 "Foreign National Visitor and Guest Access Program
7.	Employee Performance Info	OPM/GOVT-2	Executive Order 12107
			5 U.S.C. Sections 1104, 3321, 4305, and 5405

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

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 in This is an exist risks. (Check a	ing inf	formation system with cha	nges tl	nat create new privacy	
	·			OMB	memo M-03-22 for description	s
	a. Conversions		d. Significant Mergin	g	g. New Interagency Uses	
	b. Anonymous to Non- Anony	ymous	e. New Public Access		h. Internal Flow or Collection	
	c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Character of Data	
			AWIPS), ingests data that is colar and information to NOAA ar		by NOAA8883 from external sounds which olders.	ırces
	to provide NOAA environm	ental dat		nd its sta	akeholders.	ırces
			re is not a SAOP approved			
		_	formation system in whice ere is a SAOP approved P		•	
Se	ection 2: Information in t	he Svs	tem			
	2.1 Indicate what personal	ly iden			ess identifiable information all that apply.)	
	Identifying Numbers (IN)					
	a. Social Security* **	X	f. Driver's License	X	j. Financial Account***	X
	b. Taxpayer ID	X	g. Passport	X	k. Financial Transaction***	X
	c. Employer ID		h. Alien Registration		l. Vehicle Identifier	

i. Credit Card***

X

m. Medical Record

d. Employee ID

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: New employees that are in-processing will include SSN on their SF-2809 Health Benefits Registration Form, SF-1152 Beneficiary Form, etc.

*** These are government cards, accounts, and records, to streamline accounting for reimbursement.

General Personal Data (GPD)							
a. Name	X	h. Date of Birth	X	o. Financial Information			
b. Maiden Name		i. Place of Birth	х	p. Medical Information			
c. Alias		j. Home Address	х	q. Military Service	x		
d. Gender	x	k. Telephone Number	X	r. Criminal Record	x		
e. Age		1. Email Address	X	s. Marital Status			
f. Race/Ethnicity	X	m. Education	х	t. Mother's Maiden Name			
g. Citizenship	x	n. Religion					

u. Other general personal data (specify):

Alien registration

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

1. Other work-related data (specify):

Distinguishing Features/Biometrics (DFB)

a. Fingerprints	X	f. Scars, Marks, Tattoos		k Signatures	
b. Palm Prints		g. Hair Color	x	l. Vascular Scans	
c. Voice/Audio Recording		h. Eye Color	X	m. DNA Sample or Profile	
d. Video Recording		i. Height	x	n. Retina/Iris Scans	
e. Photographs		j. Weight	Х	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	X	
b. IP Address	x	d. Queries Run		f. Contents of Files	X	
g. Other system administration	n/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	x	Hard Copy: Mail/Fax	X	Online	X
Telephone	х	Email	х		
Other (specify):					

Government Sources							
Within the Bureau x		Other DOC Bureaus		Other Federal Agencies			
State, Local, Tribal		Foreign *	X				

Other (specify):

^{*}Foreign nationals submit passport information for facility access requests.

Non-government Sources							
Public Organizations Private Sector		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.

It is the responsibility of the submitter to assess the data that is collected and verify the accuracy with the receiving system personnel processing the data in the case of cyclic personnel related data.

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.
١	3206-0005
	3206-0160
	3206-0173
١	3206-0182
	3206-0219
	3206-0230
ı	3206-0258
ı	3206-0261
	0703-0061

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):						

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.	
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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 technologies (single-session)		For web measurement and customization technologies (multisession)			

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).

- GPD, IN, and WRD information is collected from employees during in processing in order to complete various human resources and administrative requirements such as the employee's Declaration for Federal Employment (OF-306 form), Employment Eligibility Verification Form (I-9 form), driver's license/passport information, Employee's Withholding Allowance Certificate (W-4 form), Hawaii Employee Withholding Allowance Certificate (HW-4 form), Employee Address (CD-525 form), Health Benefits Registration Force (SF-2809), Direct Deposit Form (SF-1199A), Employee Benefits, etc. All said forms can be found on the NOAA "New Employees" website (https://www.noaa.gov/new-employees) and are maintained by the NOAA Office of Human Capital Services (OHCS).
- DFB information is collected from employees during in processing in order to complete initial hire security background checks as part of the package sent to the Department of Commerce Office of Security.
- GPD and WRD information maintained on employees and used to create detailed administrative employee profiles and maintained for reference.
- WRD information is collected from subordinate employees by supervisors to develop and maintain employee performance plans.
- GPD information is collected from employees for emergency contact purposes.
- SAAD information is collected from information technology system users for operations and maintenance, security, and human resources activities.
- WRD and GPD information is collected, maintained, and disseminated from employees and contractors to create information technology authentication credentials which are used to access Pacific Region information technology systems.
- GPD and IN information, including passport numbers, is collected from foreign nationals and visitors to determine facility and/or site access.
- IN information is collected, maintained, and distributed by individual GSA SmartPay account holders to meet records retention requirements under the Federal Acquisition Regulation.
- 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 sensitive information residing in the NOAA8883 information system include insider threats, employees with excessive access permissions, and accidental information disclosure. Controls that have been put in place to reduce the likelihood of occurrence include initial and refresher training on the appropriate handling of sensitive information, periodic reviews of user access permissions, security background investigations, timely removal of system access for terminated employees, and maintaining/proper disposal of information in accordance with NOAA Records Schedules.

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		x			
DOC bureaus	x					
Federal agencies	х					
State, local, tribal gov't agencies						
Public						
Private sector						
Foreign governments						
Foreign entities						
Other (specify):						

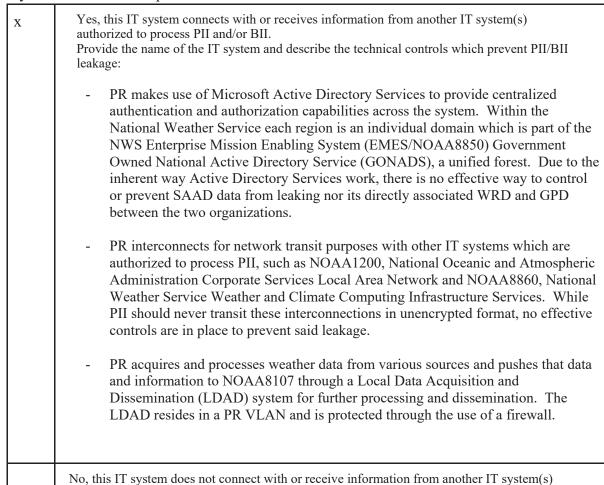
The PII/BII in the system will not be shared.	
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6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

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

No.	the bureau	operating u	nit does no	ot share	PII/BII wit	th external	agencies/en	tities.
110	ine careau	operating a	int does no	or bilai c	1 11/ 11/11 11/10	ui chteiliui	ageneres en	tition.

6.3 Indicate whether the IT system connects with or receives information from any other IT systems 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.)

authorized to process PII and/or BII.

Class of Users					
General Public		Government Employees	X		
Contractors	х				

Other (specify):		

Section 7: Notice and Consent

	lisseminated by the system. (Check of	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.		
х	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 Privacy Act Statement and/or priva	cy policy can be found on all federal-wide forms.	
	Employment" can be found at: https://www.opm.gov/forms/pdf fill/off 2. U.S. Office of Personnel Manag Certification of Training" can be found resources/training and https://www.opm.gov/4 3. U.S. Office of Personnel Manag can be found at: https://www.opm.gov/4 4. U.S. Office of Personnel Manag can be found at: https://www.opm.gov/6 5. U.S. Office of Personnel Manag be found at: https://www.opm.gov/Form6 6. Department of the Treasury Form6 https://www.irs.gov/pub/irs-pdf/fw4.pd 7. U.S. Department of Commerce Policy" can be found at: <a "employee's="" "ethnicity="" "privacy<="" "self-identification="" "statement="" 144="" 181="" 256="" a="" agreement,="" and="" at:="" authorization,="" be="" can="" certificate"="" disability"="" ement="" f="" federal="" form="" forms="" found="" href="https://www.ww.ww.www.www.www.www.www.www.www</th><th>ement Standard Form 182 " https:="" human-n.gov="" identification"="" m="" ms="" noaa.gov="" nws-pr-intranet="" of="" office="" pdf_fill="" prior="" race="" region="" security="" service"="" sf144.pdf="" sf181.pdf="" sf182.pdf="" sf256.pdf="" sites.google.com="" standard="" th="" w-4="" western="" withholding="">		
X	Yes, notice is provided by other means.	Specify how:	
		Authorized users of PR information technology systems are notified both in the NOAA rules of behavior and system usage consent warning banner that there is no expectation of privacy while using these systems which includes SAAD and directly associated WRD, and GPD information. Unauthorized users have no reasonable expectation of notification.	
	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: All individuals have the opportunity to decline, verbally or in writing to the person requesting the information, to provide information when individually requested, though failure to provide it may result in adverse administrative actions such as site access denial or loss of employment/contract. Individuals may decline to provide SAAD information, but they would not be able to use Pacific Region technology assets. SAAD information is automatically generated and captured by using Pacific Region information technology assets.
	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not:

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: Individuals are given the opportunity to consent, in writing, to their supervisors, to only particular uses of their PII/BII, at the point at which the supervisor asks for the information. The supervisor explains the purpose of the collection, if it is voluntary or if lack of provision will affect their employment or access to services, and how/if the information will be shared. If there is a form, this information is also provided on the form. However, completion of each form or compliance with other specific requests for information, is for a specific purpose only, e.g. human resources, COOP, travel.
X	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: SAAD information and directly associated WRD and GPD is generated, maintained, and disseminated automatically via system usage and correlated among various IT and IT security applications, often real-time, hence it is not possible for users to consent to its usage outside their inherent consent simply by virtue of use.

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: - Authorized information technology users can always review or update their individual credential related GPD and WRD information via submitting an IT service request ticket through the system or by contacting their local information technology operations and maintenance staff. Pacific Region Headquarters - Administrative Management Division: - Employees have the opportunity to review and update their information any time they receive a earning and leave statement, electronic fund transfer, or travel documents.
X	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: It is not possible to allow individuals to update SAAD information pertaining to them given the automated and often immutable nature of the audit logs

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.
Х	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 practice.
Х	Access to the PII/BII is restricted to authorized personnel only.
х	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: All access to PII in electronic form is recorded via automated operating system audit logging mechanisms for a minimum period of one ninety days.
х	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): 02/17/2023 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.
Х	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.
	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*).

Pacific Region personnel with access to PII use the Department of Commerce secure file transfer web application to exchange sensitive PII with relevant external system entities per agency direction on an individual transfer basis.

Internally, the system encrypts data at rest using McAfee for workstations, TPM/SED for virtual servers, and SED on physical servers to protect sensitive PII.

Section 9: Privacy Act

9.1 Is the PII/BII searchable by a personal identifier (e.g., name or Social Security number)?
<u>x</u> 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, and Payroll Records of Employees and Certain Other Persons

(https://www.osec.doc.gov/opog/PrivacyAct/SORNs/dept-1.html)

COMMERCE/DEPT-6, Visitor Logs and Permits for Facilities Under Department Control (https://www.osec.doc.gov/opog/PrivacyAct/SORNs/dept-6.html)

COMMERCE/DEPT-9, Travel Records (Domestic and Foreign) of Employees and Certain Other Persons

(https://www.osec.doc.gov/opog/PrivacyAct/SORNs/dept-9.html)

COMMERCE/DEPT-18, Employees Information not covered in other system of record notices (https://www.osec.doc.gov/opog/PrivacyAct/SORNs/DEPT-18.html)

COMMERCE/DEPT-25, Access Control and Identity Management System (https://www.osec.doc.gov/opog/privacyact/sorns/dept-25.html)

COMMERCE/DEPT-27, Investigation and Threat Management Record (https://www.osec.doc.gov/opog/privacyact/sorns/dept-27.html)

OPM/GOVT-2, Employee Performance File System Records

(https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-2-employee-performance-file-system-records.pdf)

GSA/GOVT-7, HSPD-12 USAccess

(https://www.osec.doc.gov/opog/PrivacyAct/sorns/GOV-Wide/GSA-GOV7-2015-26940.pdf)

Yes, a SORN has been submitted to the Department for approval on (date). Select this line if there is a pending SORN, such as the Public Affairs Archive SORN.

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.)

There is an approved record control schedule.

Provide the name of the record control schedule:

- NOAA Records Control Schedule Chapter 200-09.
- NOAA Records Control Schedule Chapter 200-23.
- NOAA Records Control Schedule Chapter 207
- NOAA Records Control Schedule Chapter 304
- NOAA Records Control Schedule Chapter 309
- NOAA Records Control Schedule Chapter 2300
- NOAA Records Control Schedule Chapter 2400

	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	х	Overwriting	X
Degaussing	х	Deleting	х
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.)

х	Identifiability	Provide explanation: Identity may be discovered by compiling contact information, SSN and/or passport number.
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X	Quantity of PII	Provide explanation: There is a significant amount of PII and some BII, primarily pertaining to local federal employees and a minimal number of vested contractors, interns, intended visitors, and volunteers.
x	Data Field Sensitivity	Provide explanation: There are several sensitive data fields.
x	Context of Use	Provide explanation: Data is collected only for the stated purpose.
X	Obligation to Protect Confidentiality	Provide explanation: Government is obligated to protect confidentiality of SSNs, financial account and transaction information, and credit card data.
x	Access to and Location of PII	Provide explanation: All PII collected is only accessible internally within the line office.
	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.)

Threats to privacy would primarily be insider threat, whether malicious or unintended. There have been instances where individuals have sent their own or another person's privacy data via Bureau email instead of secure file transfer. The individuals are counseled and re-trained when this occurs and is reported or was detected.

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.