S. Department of the Interior
VACY THRESHOLD ANALYSIS

The DI-4012 Privacy Threshold Analysis (PTA) form helps Department of the Interior (DOI) Privacy Officials determine whether a new or revised Privacy Impact Assessment (PIA) is required in accordance with the E-Government Act, OMB policy, and the DOI PIA Guide, and identify other related compliance requirements for the collection, maintenance, storage, use, processing, sharing or disposal of personally identifiable information (PII) and any activities that may have privacy implications or otherwise impact individual privacy. See the DOI PTA Guide for guidance on completing the PTA. PTAs must be completed and submitted to the appropriate Bureau/Office Associate Privacy Officer for review and compliance determination. Bureau/Office Associate Privacy Officers are responsible for overseeing and managing PTAs for their organizations.

Section 1. General Information

Question	Response
A. Project, Program or System Name: *Provide the name for the project, program or system for the PTA, which may be an IT system, a project title, program area, information collection, or other technology.*	Markup Application National Map Re-Engineering Project (NMRP)
B. Bureau or Office: *Enter the bureau or office for the project, program or system.*	National Geospatial Technical Operations Center National Geospatial Program Core Science Systems U.S. Geological Survey
C. Program or Office: *Provide the name of the program or office within the bureau/office.*	National Hydrography Program
D. Project/Program Manager or System Owner: *Enter the name, title, phone number, and email address of the Program Manager or System Owner.*	Name: Kari J. Craun Title: Director, National Geospatial Technical Operations Center Phone: (573) 308-3802 E-mail: kcraun@usgs.gov
E. Routing Information: *Indicate whether this is a new or updated PTA and enter the date the PTA was completed and submitted to the APO for privacy determination.*	_ X _ New PTA ___ Updated PTA Date of Submission: March 26, 2019

Section 2. Project, Program or System Summary

Question	Response
A. General description of the project, program or system. *Please provide a description of the project or program, including any background information to help understand the project, program or system. If this is an updated PTA, please describe the changes that triggered the update to this PTA. Please also indicate if the PTA is being updated as part of its annual review.*	The Markup Application is a component of NMRP which permits members of the public to log in using a Google email account or ArcGIS Online account and create a markup, which is a suggestion for edits to Hydrography datasets. The person making the markup suggestion does NOT make edits to the datasets; they provide information that tells USGS what edits need to be made. The suggestion is then reviewed by a state partner (liaison) who determines the validity of the recommendation. The email address of the person who creates a markup is retained. The technical implementation of the Markup Application is similar to the TNMCorps Application.
B. What is the technology or format used for the Project, Program or System? *Select all types of technology or sources that apply for the PII that will be collected from or maintained on individuals, including methods such as a paper or electronic form or survey, website collection, social media, or interviews over the phone or in person.*	_X_ IT System ___ New Project or Program _X_ Website _X_ Web Form, Survey or Information Collection ___ Third-Party Website ___ Social Media Application ___ SharePoint ___ Mobile Application ___ Closed Circuit Television (CCTV) ___ Paper-based Collection ___ Other: *Describe.*
C. Does this project, program or system involve a form, survey or information collection? *If this project, program or system uses a form, survey, or other information collection, select "Yes" and describe the specific method or format used. Include titles and numbers or other identifying information.*	X_ Yes: *Please describe.* Upon logging into the web application, the users can select a feature in the map view they would like to submit a suggestion for. They can fill out information to support the suggested change and they choose what type of change they are suggesting: delete, update, or

	comment. The user also has an option to draw a suggested shape for the selected feature. The suggested geometry information gets stored in the database along with the user's description and user's email address. ___ No
D. Is Office of Management and Budget (OMB) approval required for the collection? *OMB approval is required for certain collections of information from ten or more members of the public under the Paperwork Reduction Act.*	<u>X</u> Yes: *Please provide the status of any information collection clearance request related to this project, program or system, and include all OMB Control Numbers and Expiration Dates that are applicable.* The project has initiated the ICR process with the USGS POC, James Sayer. The project has 1 year to complete the ICR requirements. ___ No

Section 3. Personally Identifiable Information

Question	Response
A. What categories of individuals does the Project, Program or System collect, maintain, store, use, process, disseminate or dispose of PII? Please select all that apply. *Indicate whether the project, program or system collects, contains, uses or disseminates PII information about members of the general public, Federal employees, contractors, or volunteers; or if the system does not contain any information that is identifiable to individuals (e.g., statistical, geographic, financial).*	___ Federal employees ___ Contractors X_ Members of the public X__ Other: *Describe.* ___ This project, program or system does not collect, maintain or process PII Description of *Other*: The email address associated with the Google account or ArcGIS Online account is shared with State Partners who have responsibility for reviewing the recommended Markup changes submitted for their states.
B. What specific information about individuals will be created, collected, used, processed, maintained or disseminated? *Describe all the types of information about individuals that will be created, collected, used, processed, maintained, or disseminated. Include any new information that may be created, such as an analysis or report. Describe the purpose of that collection or use of information.*	The only information about individuals that is collected, used, processed, maintained, or disseminated in this application is the person's email address associated with the Google account or ArcGIS Online account. No new information about individuals is created by the system.
C. Is information retrieved by a unique identifier assigned to the individual? *Describe how information is retrieved for the project, program or system.*	X_ Yes: *Please describe.* The information the individual submits through the Markup Application is associated with a unique identifier- their email address for the Google account or their ArcGIS Online account. ___ No
D. Is the information covered by a System of Records Notice (SORN)? *The Privacy Act requires that agencies publish a SORN in the Federal Register upon the establishment of a new, or modification of an existing, system of records. For new SORNS being developed, select "Yes" and provide a detailed explanation. For existing systems of records, identify the applicable government-wide, DOI, or bureau SORN(s) that covers the system of records with the SORN identifier*	_X_ Yes: *Please provide the title, date, and Federal Register citation.* Computer Registration System – Interior, GS-18 ___ No

Question	Response
and Federal Register citation.	
E. Does the Project, Program or System collect or use Social Security Numbers (SSNs)? *List the statutory and regulatory authority and Executive Orders that authorizes the collection or use of SSNs to meet an official program mission or goal.*	___ Yes: *Please provide the legal authority for the collection of SSNs and describe the uses of the SSNs within the Project, Program or System.* _X__ No
Does this Project, Program or System receive or share PII with any other internal DOI programs or systems? *Indicate whether PII will be shared with or from internal organizations within DOI.*	_X_ Yes: *Please describe the PII shared and purpose of the sharing.* Staff at the National Geospatial Technical Operations Center is responsible for maintaining and editing national hydrography datasets. The approved set of editors are responsible for reviewing markups when state partners are not able to do so. These staff will have access to all information collected for the markups so that they can complete the approval process and handle appropriate edits in the national datasets. ___ No
G. Does this Project, Program or System receive or share PII with any external (non-DOI) partners or systems? *Indicate whether PII will be shared with agencies or organizations external to DOI. This could be other federal, state and local government agencies, private sector entities, contractors or other external third parties. For Privacy Act systems, identify the applicable SORN and describe how an accounting of the disclosure is maintained.*	X_ Yes: *Please describe the PII shared and purpose of the sharing.* The email address associated with the Google account or ArcGIS Online account is shared with State Partners who have responsibility for reviewing the recommended Markup changes submitted for their states. ___ No

Question	Response
H. Is this external sharing pursuant to new or existing information sharing agreement (Memorandum of Understanding, Memorandum of Agreement, Letters of Intent, etc.)? *Information sharing agreements are generally documented in Memorandums of Understanding, Memorandums of Agreement, Letters of Intent, or other documents, and outline the purpose, roles of the parties, data ownership, authorized uses, policy, scope, standards, procedures, practices, limitations on re-dissemination, and safeguard requirements for the transfer, maintenance and disposal of PII to ensure all parties understand and adhere to the mutually established terms of the agreement.*	X__ Yes: *Please describe applicable information sharing agreement(s) in place.* USGS and each state partners work under the Memorandum of Understanding (MOU) with the corresponding state. The state partners are expected to review and perform edits to the national hydrography datasets under their corresponding MOU. ___ No

Section 4. PTA Review and Recommendation

Question	Response
Privacy Compliance Determination: *This determination is to be completed by the Associate Privacy Officer (APO). See DOI PTA Guide, DOI PIA Guide, related Federal laws and policies, and Departmental guidance on privacy requirements.*	___ PTA is sufficient at this time _X_ Privacy Impact Assessment (PIA) required ___ Adapted PIA required ___ System of Records Notice (SORN) required ___ Notice of Proposed Rulemaking/Final Rule required ___ Computer Matching Notice required ___ Computer Matching Agreement required _X_ Privacy Act Statement required ___ Privacy Notice required ___ Specialized role-based training required ___ Information sharing agreement required ___ Further privacy compliance review is required ___ Refer for Security Compliance Assessment _X_ Refer for Information Collection Clearance Review ___ Refer for Records Review ___ Other: *Describe.*
Bureau Associate Privacy Officer Comments: *Provide comments or additional guidance on privacy compliance requirements.*	**Privacy Impact Assessment (PIA) required:** Project collects PII from 10 or more members of the public – requires a PIA. See PIA webpage for PIA template and examples of approved PIAs. **Privacy Act Statement required:** Required at the point of collection (see Privacy Act Statement webpage for training slides and examples). **Refer for Information Collection Clearance Review:** Program is currently working with the Information Collections Clearance Officer to obtain OMB clearance.
Associate Privacy Officer Name:	James Piyavansuthi (Acting for Meshell Berry)
Bureau/Office:	U.S. Geological Survey/Office of Enterprise Information
Date:	September 16, 2019

DOI Privacy Office Comments