

U.S. Department of Commerce
U.S. Census Bureau



Privacy Impact Assessment
for the
Office of Chief Information Office
(OCIO) Qualtrics

Reviewed by: Donna Neal (on behalf of Byron Creech), Bureau Chief Privacy Officer

- ☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
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Date

**U.S. Department of Commerce Privacy Impact Assessment
U.S. Census Bureau, Qualtrics**

Unique Project Identifier: 006-000401700 00-07-02-00-01-00

Introduction: System Description

Provide a brief description of the information system.

Qualtrics is a Cloud-based subscription survey software which allows for online collection of information to support Census Bureau activities. Survey information collected in Qualtrics is used for statistical purposes only. The information in Qualtrics can only be accessed by sworn Census Bureau employees or contractors. The Qualtrics Cloud service provider does not have access to the encryption keys for Census Bureau data.

The Census Bureau's use of the Qualtrics system serves four separate and distinct types of surveys:

1. Qualtrics is used to create/manage/conduct surveys for qualitative research including cognitive interviews, usability testing, and focus groups to test new materials and methods.
2. Qualtrics is used to create/manage/conduct surveys to understand public perceptions of the work the Census Bureau is doing.
3. Qualtrics is used to create/manage/conduct ad-hoc surveys to measure specific social and economic conditions of the nation.
4. Qualtrics is also used to collect data from Census employees for training and other human resource purposes.

Address the following elements:

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

Qualtrics is a FedRAMP approved Software as a Service (SaaS)

(b) System location

Amazon Web Services (AWS) Gov Cloud located in Oregon, U.S.A.

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

Stand-alone

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

This system will serve as a research data collection tool. In addition to collecting data, the tool is also used to evaluate and improve the Census Bureau's online services for decennial, economic and demographic surveys. The tool is programmed by Census Bureau staff and sent to sampled members of the public, employees, or customers for data collection. Through this tool, the Census Bureau can:

- Create, test, modify, and implement surveys,
- Apply flow logic to surveys with advanced branching and display logic,
- Use a variety of question types,
- Embed data (either pre-existing from an input file or from previous survey questions),
- Ability to implement survey quotas,
- Mobile and offline compatibility,
- Randomization within question, between questions and between survey instruments.

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

Data access is predominantly for the purpose of data analysis and the generation of statistics. If a Census Bureau analyst has access to the data, they can retrieve the data based on any of the characteristics collected in the data, including personally identifiable information (PII). However, this type of retrieval is rare and is for the purpose of quality control.

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

Respondents submit data using HTTPS (TLSv1.2 with AES 128/256 depending on the browser) to the front-end web server (typically *customernumber.qualtrics.com*). All data in transit (respondent data to the cloud and the data from the cloud to Census) is encrypted via TLSv1.2.

Data are processed by application servers and sent to database servers for storage. Web data are delivered to the respondent in the form of survey questions, graphics, and other content created in the survey design. Some surveys are restricted by password or location, as setup by the survey creator. This multi-tiered architecture has multiple layers of hardware and software security to ensure that no device/user can be inserted into the communication channel.

For high availability and speed, base code and static images/docs are stored in the cloud and delivered to users as efficiently as possible using cache and location information.

(g) Any information sharing conducted by the system

Data collected in this system will be stored within the system and transferred to Census Bureau systems for storage and analysis as described above. Data will be shared with survey sponsors.

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

Title 13 U.S.C., Sections 6 (c), 141 and 193

Title 13 U.S.C., Chapter 5, 8(b), 131, and 182.

Title 13 U.S.C. 8(b), 182, and 196.

15 CFR part 50.

5 U.S.C. 3301 and 1402

1128 of the National Defense Authorization Act

5 USC 1101 Note

EO 13197/66 FR 7853

Title 26 U.S.C

(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 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.

X This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment.

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	
c. Employer ID		h. Alien Registration		l. Vehicle Identifier	
d. Employee ID		i. Credit Card		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	X	o. Financial Information	X ¹
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	

¹ Does not include financial account information, but only income and program participation.

e. Age	X	l. 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 data (specify):					

Work-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	X
c. Work Address	X	g. Work History	X	k. Procurement/contracting records	
d. Work Telephone Number	X	h. Employment Performance Ratings or other Performance Information			
k. 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	X	n. Retina/Iris Scans	
e. Photographs		j. Weight	X	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	
e. 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	X
Telephone		Email			
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):					

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

Data collected through this system is self-response. After submission of the survey, respondents can submit a Privacy Act request to review their responses for accuracy. Respondents' Perspective: 1. A respondent takes a survey, and the response is submitted to Qualtrics short-term response storage over HTTPS. 2. All data for every survey collected by Census Bureau are encrypted. 3. The Encryption Service uses the customer-specific Master Key in Amazon KMS service to retrieve the survey's AES 256-bit data encryption key from the Amazon Key Management Service. 4. The Encryption Service uses the key, plus a response-specific initialization vector, to encrypt the data and write it to the Qualtrics Response Database. 5. When the response information is eventually recorded to back up in an offsite data center, backup data are still in its encrypted form and an extra layer of encryption is applied to the entire disc. Internal Users' Perspective 1. The user authenticates to Qualtrics. 2. The user makes a request to response storage to get data for a particular survey. 3. The unique customer ID for the survey is referenced to determine whether the customer uses Qualtrics Data Isolation. 4. If Data Isolation is used, the Encryption Service uses the customer-specific Master Key in Amazon KMS service to retrieve the survey's AES 256-bit data encryption key from the Amazon Key Management Service. 5. The encrypted data are retrieved from the Qualtrics Response Cache and/or Response Database and then decrypted with the customer's key and the response's unique initialization vector. 6. The data are returned in plaintext to the user over HTTPS.

2.4 Is the information covered by the Paperwork Reduction Act?

X	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection. 0607-0725; 0607-0978; 0607-0971, 0690-0030, 0690-0035, 0607-1029, 0607-1025, 0607-1027, 1850-0975, 0920-0214
	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 (TUCPNPD)

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.
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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	
For administrative matters		To promote information sharing initiatives	
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
To improve Federal services online	X	For employee or customer satisfaction	X
For web measurement and customization technologies (single-session)		For web measurement and customization technologies (multi-session)	
Other (specify): Information collected by this IT system will be used to produce national demographic and economic statistics. In addition, this IT system will also be used to support the Census Bureau in testing new materials and methods to understand public perceptions of the work the Census Bureau is doing. This will be used in addition to the qualitative research methods, cognitive interviews, usability testing and focus groups that Census Bureau currently conducts.			

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).

PII will be collected from members of the public and from businesses.

- Research information for developing and testing questionnaires will be used by staff from the Census Bureau to evaluate and improve the quality of the data in the surveys and censuses that are ultimately conducted.
- Information collected for survey data will be used to produce national demographic and economic statistics.

PII will also be collected from Census Bureau employees, contractors, and other federal government personnel, for training surveys and other human resource purposes such as the exit and retention surveys, recruitment at job fairs, satisfaction surveys, etc.

- 5.2 Describe any potential threats to privacy 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 U.S. Census Bureau use of data/information presents possible threats such as internal breaches caused by employees within an organization. Today's most damaging security threats are not originating from malicious outsiders or malware but from trusted insiders - both malicious insiders and negligent insiders. Inside threats are not just malicious employees that intend to directly harm the Bureau through theft or sabotage. Negligent employees can unintentionally cause security breaches and leaks by accident. To prevent or mitigate potential threats to privacy the U.S. Census Bureau has put into place mandatory training for all system users. All Census Bureau employees and contractors undergo mandatory annual data stewardship training to include proper handling, dissemination, and disposal of BII/PII/Title 13/Title 26 data.

All system users will complete annual Data Stewardship Training and will sign both the Census Bureau and the Qualtrics' Acceptable Use Policies, which specify the protection of data, and that the data, when applicable, is stored on the secure Census network.

All data in transit and at rest (respondent data to the cloud and the data from the cloud to Census) is encrypted via TLSv1.2. The cloud service providers will not possess the encryption keys to Census Bureau data.

Deprecated or defective media (specifically, hard drives) are erased according to a U.S. Department of Defense compliant 3-pass overwrite standard, and/or physically destroyed.

At the end of the retention period, surveys will be deleted. Since Qualtrics uses the data isolation service, a key hierarchy is created for each Federal customer. Key management is via Amazon Web Services Key Management Service (KMS). Each customer has a unique Key Encryption Key (KEK) used to encrypt and protect a series of unique Data Encryption Keys (DEK). Unique

DEK is created for each customer survey. A federal customer may request key destruction of the customer specific KEK which leads to survey data destruction. The data decommissioning procedures are established by the federal customer Brand administrator.

The Census Bureau conducts various surveys that study households, businesses, schools, hospitals, and more. These statistics deliver valuable information for local officials and organizations who provide resources and services to the community. If a respondent has been contacted to participate in a survey and wants to verify that it is legitimate, they can do so in numerous ways. The Census Bureau provides guidance on how to verify the legitimacy of a survey invitation at the following link: <https://www.census.gov/programs-surveys/surveyhelp/verify-a-survey.html>

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 ²	
Federal agencies		X ²	
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.
☐	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.

² Data collected on behalf of a survey sponsor is shared with the survey sponsors.

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. The Qualtrics system does not connect directly to any Census Bureau systems however, contact files can be manually uploaded from Census Bureau systems into the Qualtrics system when necessary. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: The Census Bureau uses a multitude of security controls mandated by the Federal Information Security Modernization Act of 2014 (FISMA) and various other regulatory control frameworks including the National Institute of Standards and Technology (NIST) special publication 800 series. These security controls include but are not limited to the use of mandatory HTTPS for public facing websites, access controls, anti-virus solutions, enterprise auditing/monitoring, encryption of data in transit and at rest, and various physical controls at Census Bureau facilities that house Information Technology systems. The Census Bureau also deploys a Data Loss Prevention solution and a security operations center to monitor all Census IT system on a 24/7/365 basis.
	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	X	Government Employees	X
Contractors	X		
Other (specify): General public will have access to enter their own data only. They will not have access to other respondents' data.			

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: A notice specific to the collection will be provided by a Privacy Act statement once the user accesses the system.	
	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: Individuals may refuse to participate in the survey or, if they do participate, they may refuse to answer specific questions.
	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: The privacy act statement will provide implied consent specific to each data collection.
	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 survey data, respondents may submit a Privacy Act request to review their information.
X	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: For research data, these data are collected for research purposes only, therefore there is not an opportunity to review/update.

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: Only authorized government/contractor personnel are allowed to access PII/BII within a system. In addition, audit logs are in place and assessed per NIST control AU-03, <i>Content of Audit records</i> .
X	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): <u>7/18/2023</u> ☐ 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 5 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 supporting 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 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).

All response data resides in Amazon Web Services (AWS) GovCloud (environment is specific only for Federal customers), and data is protected by disk level encryption and database encryption. In addition, the encryption keys are maintained by the Census Bureau. The cloud provider will not have access to the encryption keys.

AWS GovCloud has an existing ATO (Authority to Operate) under FedRAMP, which gives Government agencies the ability to leverage AWS GovCloud for sensitive workloads.

Privileged Engineer access to the Insight Platform production environment is by SSH to the bastion host, but they do not have access to customer PII. Within the production system, Qualtrics uses both disk level encryption as well as database encryption to protect customer data.

Qualtrics uses Transport Layer Security (TLS) encryption for all transmitted Internet data. Customers may opt to password protect their surveys or have unique ID links that are difficult to guess. Our services are hosted by trusted third party data centers that are audited using the industry standard SSAE-16 SOC 1 Type 2 method. All data at rest are protected using sophisticated electronic controls, and data on deprecated hard drives are destroyed by U.S. DOD methods and delivered to a third-party data destruction service.

Census Bureau Information technology systems employ a multitude of layered security controls to protect BII/PII at rest, during processing, as well as in transit. These NIST 800-53 controls, at a minimum, are deployed and managed at the enterprise level including, but not limited to the following:

- Intrusion Detection | Prevention Systems (IDS | IPS)
- Firewalls
- Mandatory use of HTTP(S) for Census Public facing websites
- Use of trusted internet connection (TIC)
- Anti-Virus software to protect host/end user systems
- Encryption of databases (Data at rest)
- HSPD-12 Compliant PIV cards
- Access Controls

Census Bureau Information technology systems also follow the National Institute of Standards and Technology (NIST) standards including special publications 800-53, 800-63, 800-37 etc. Any system within the Census Bureau that contains, transmits, or processes BII/PII has a current authority to operate (ATO) and goes through continuous monitoring on a yearly basis to ensure controls are implemented and operating as intended. The Census Bureau also deploys a Data Loss Prevention solution and a security operations center to monitor all Census IT system on a 24/7/365 basis.

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. <i>(list all that apply):</i> CENSUS-3, Special Censuses, Surveys, and Other Studies: https://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-3.html CENSUS-4, Economic Survey Collection http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-4.html CENSUS-5, Decennial Census Program: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html CENSUS-7, Demographic Survey Collection (Non-Census Bureau Sampling Frame): https://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-7.html
	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
	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: GRS 3.1 GRS 4.2 Decennial Records are covered by: N1-29-05-01, N1-29-10-5, GRS 3.1, GRS 5.6 item 181 Demographic Records are covered by: N1-29-99-5, N1-29-89-3, N1-29-12-1, NC1-29-79-7, and GRS 3.1 GRS 3.2 GRS 4.1, GRS 4.3
	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		Overwriting	X
Degaussing		Deleting	X
Other (specify): At the end of the retention period, surveys will be deleted. Since Qualtrics uses the data isolation service, a key hierarchy is created for each Federal customer. Key management is via Amazon Web Services Key Management Service (KMS). Each customer has a unique Key Encryption Key (KEK) used to encrypt and protect a series of unique Data Encryption Keys (DEK). A unique DEK is created for each customer survey. A federal customer may request key destruction of the customer specific KEK which leads to survey data destruction. The data decommissioning procedures are established by the federal customer Brand administrator.			

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 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.
	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
X	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: PII collected can be indirectly used to identify individuals or if combined with other data elements may uniquely identify an individual.
X	Quantity of PII	Provide explanation: The collection is for samples; therefore, a serious or substantial number of individuals would be affected if there was loss, theft, or compromise of the data.
X	Data Field Sensitivity	Provide explanation: The PII, alone or in combination, may be relevant in some other contexts and may, in those contexts, make the individuals or the Census Bureau vulnerable to harm.
X	Context of Use	Provide explanation: Disclosure of the PII may result in serious harm to the individual or organization.
X	Obligation to Protect Confidentiality	Provide explanation:

		Role-specific privacy laws, regulations, or mandates (e.g., those that cover certain types of healthcare or financial information) apply that add more restrictive requirements to government-wide requirements. Violations may result in serious civil or criminal penalties.
X	Access to and Location of PII	Provide explanation: The PII is physically located on servers owned and managed by a third-party vendor at offsite facilities located in the United States. The third-party vendors used are Federal Risk and Authorization Management Program (FedRAMP) approved Cloud Service Providers (CSPs).
	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.)

Data stored in the AWS GovCloud is in accordance with federal information security standards, however, the Census Bureau has taken the extra step of maintain the encryption keys to Census data stored on the cloud. The cloud service provider does not have access to the encryption keys.

Insider threat is always possible. In addition to the security protocols already described in this assessment, the Census Bureau limits access to sensitive information to sworn employees who have an authorized business need to know.

- 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.