

**Federal Communications Commission**  
*Office of the Managing Director*



**Privacy Threshold Analysis (PTA)<sup>1</sup>**  
**Clarity Portfolio Project Management Application**

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**FCC Bureau/Office:** Office of Managing Director (OMD)  
**Division:** Information Technology Center (ITC)

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<sup>1</sup> This form is used to determine whether this information system requires a Privacy Impact Assessment.

The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

The E-Government Act of 2002 defines an information technology and/or system by reference to the definition sections of Titles 40 and 44 of the United States Code (U.S.C.). The following summarize these definitions:

- “Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. *See* 40 U.S.C. 11101(6).
- “Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. *See* 44 U.S.C. 3502(8).

It is important, therefore, that when the FCC develops or makes changes to its information systems, the FCC should analyze what information the system will collect and maintain to determine whether there are any privacy issues.

The purpose of the **Privacy Threshold Analysis (PTA)** is to help the FCC’s bureaus/offices evaluate the information/data in the system and make the appropriate determination about how to treat the information/data, as required by the Privacy Act’s regulations.

Thus, the Privacy Threshold Analysis helps the bureaus and offices to determine if the data in the information system include information about individuals, *e.g.*, personally identifiable information (PII), which will require a **Privacy Impact Assessment (PIA)** to be conducted.

### Section 1.0 Information System’s Status:

#### 1.1 Status of the Information System:

- New information system—Implementation date: August 2010
- Revised or upgraded information system—Revision or upgrade date:

If this system is being revised—what will be done with the newly derived information:

- Placed in existing information system—Implementation Date:
- Placed in new auxiliary /ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The FCC's Information Technology Center (ITC) is installing the Clarity Portfolio Project Management Application information system ("Clarity") to track work performance measurements for the Commission's information technology investments.

If this is a new information system, please skip to Question 1.6.

#### 1.2 Has this information system existed under another name, or has the name been changed or modified?

- Yes

No

Please explain your response:

- 1.3 Has this information system existed previously or been operated under any other software program, information system medium, *i.e.*, electronic database or paper files, and/or other format?

Yes

No

Please explain your response:

- 1.4 Has this information system existed under a system of records notice (SORN) by itself, or was it ever part or component of another SORN?

Yes

No

Please explain your response:

- 1.5 Is this information system being changed or upgraded, and if so, what are the purposes for changing or upgrading the information system, and/or will any changes now include personally identifiable information (PII):

Yes

No

Please explain your response:

- 1.6 Why is the information being collected, *e.g.*, what are the information system's purposes, intended uses, and/or functions:

Clarity requires information on contractor resources in order to plan work and determine actual work performance against planned performance at the aggregate level. Clarity performs two measurement functions to track the Commission's IT investments: (1) Schedule Performance Index (SPI) for work performance, and (2) Cost Performance Index (CPI) for allocating and tracking investment funding. Clarity also provides planning information on the resources available to perform project tasks.

- 1.7 What information is the system collecting, analyzing, managing, storing, transferring, *etc.*:

**Information about FCC Employees:**

- No FCC employee(s) data
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN
- US Citizenship
- Non-US Citizenship

- Race/ethnicity
- Gender
- Biometric data
  - Fingerprints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other personal/background information: FCC e-mail addresses.

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- US Citizenship
- Non-US Citizenship
- Biometric data
  - Fingerprints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age

- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other personal/background information: FCC e-mail addresses and aggregate salary hourly rates for contractors (IT contractor support services).

**Information about FCC Volunteers, Visitors, Customers, and other Individuals:**

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN:
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address

- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

**Information about Business Customers (usually not considered “personal information”):**

- Not applicable
- Name of business contact/firm representative
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address
- Intra-business office address (office or cubical number)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

**“Non-personal” information obtained from FCC sources:**

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information:

**Miscellaneous Business, Technology, or Other Information:**

- Not applicable
- Not publicly available business or technology data, *i.e.*, trade or propriety information
- Other information, please specify: ITC/CIO allocation of IT funding/investments; performance of the IT funding/investment.

1.8 What are the sources for the information that you are collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC Individuals and/or households:
- Non-personal information from businesses and other for-profit entities: Contractor monthly reports which will inform/validate the Clarity data.
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources, please specify: FCC's organizational charting and contractors working at FCC-linking Documentum (FCC's ITC storage and workflow software). The Documentum information system does not include any personally identifiable information from either FCC employees or contractors--work flow data and project documentation.

1.9 Will the information system obtain, use, store, analyze, *etc.* information about individuals, *e.g.*, personally identifiable information (PII), from other information systems, including both FCC and non-FCC information systems?

- Yes
- No

Please explain your response:

Information in Clarity limited to the FCC application "Documentum" as a data storage capability. The information is stored at the aggregate level, *e.g.*, no individual PII is being identified in the measurement analysis.

If this information system is a “stand alone” information system, *e.g.*, it does not use information from another system, and/or it is not linked to another information system, please skip to Question 1.12.

1.10 If the system uses information, including information about individuals (PII), from other information systems, what information will be used?

Information system name(s):

- Not applicable
- Individual's name
- Other names, *i.e.*, maiden name, *etc.*
- SSN:
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Finger prints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
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- Home telephone number(s)
- Personal cell phone number(s)
- Personal e-mail address(es)
- Personal fax number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Non-FCC government badge or employee ID number(s), *e.g.*, contractor's badge number.
- Law enforcement data
- Background investigation history
- Military history
- National security data
- Foreign countries visited
- Other information:

**Information about Business Customers and others (usually not considered "personal information"):**

- Not applicable
- Name of business contact/firm representative, customer, or others
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional/Personal clubs and/or affiliations

- Full or partial SSN:
- Intra-business office address (office or workstation)
- Business/office address
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Race/Ethnicity
- Customers' gender(s)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Credit report(s)
- Other information:

**Miscellaneous Business Information:**

- Not applicable
- Not publicly available business data, i.e., trade or propriety information
- Other information:

**“Non-personal” information:**

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information: data provided via the Documentum software link.

1.11 What are the sources for the information from the other information system(s) that you are collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households:
- Non-personal information from businesses and other for-profit entities:
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources: As noted in Questions 1.8 and 1.9, the FCC's organizational charting and contractors working at FCC--linking Documentum (FCC's ITC storage and workflow software). The Documentum information system does not include any personally identifiable information from either FCC employees or contractors--work flow data and project documentation.

1.12 Will the information system derive new information or create previously unavailable information through aggregation or consolidation from the information that will now be collected, including (where applicable) information that is being shared or transferred from another information system?

- Yes  
 No

Please explain your response:

As noted in Question 1.6, Clarity will track and analyze performance and cost data of the FCC's IT investment funding which will provide refined investment performance data.

1.13 Can the information, whether it is: (a) in the information system; (b) in a linked information system; and/or (c) transferred from another system, be retrieved by a name or a "unique identifier" linked to an individual, *e.g.*, SSN, name, home telephone number, fingerprint, voice print, *etc.*?

- Yes  
 No

Please explain your response:

ITC is looking for how effective its IT investment/project performance outputs are with respect to schedule and cost performance metrics. The data will be viewed at the aggregate level, however, it is possible to look at the individual level, *e.g.*, information on individual staff performance levels. At present, to be clear, the FCC's purpose for using Clarity is to review project information metrics at the aggregate level.

1.14 Will the new information include personal information about individuals, *e.g.*, personally identifiable information (PII), which is to be included in the individual's records or to be used to make a determination about an individual?

- Yes  
 No

Please explain your response:

As noted in Question 1.13, the FCC's purpose for using Clarity is to review project information at that aggregate level for the Commission's IT investments. Clarity is not designed or intended to make determinations about individual work performance.

If the information system contains information about individuals, please answer Question 1.15; but if the information system does not contain information about individuals, please skip to Question 1.16.

1.15 What is the potential impact or "security risk" on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs?  
(check one)

- Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.  
 Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.  
 Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

1.16. What is the potential impact or “security risk” for the information that is maintained in the information system if an unauthorized disclosure or misuse of information occurs?  
(check one)

- Results in little or no harm, embarrassment, inconvenience, or unfairness.
- Results in moderate harm, embarrassment, inconvenience, or unfairness.
- Results in significant harm, embarrassment, inconvenient, or unfairness.

Please explain your response:

As noted above, Clarity is designed to measure aggregate IT funding/performance metrics. It does not involve any PII data. Therefore, an inadvertent breach of information is likely to pose only minimal impacts or security risks.

1.17 Is this impact level consistent with the guidelines as determined by the FIPS 199 assessment?

- Yes
- No

Please explain your response:

The security review is underway and will be completed in FY2010.

1.18 When was “Certification and Accreditation” (C&A) last completed?

Clarity is a new application in the FCC inventory. IT Infrastructure Security group is performing a security review on the application. Clarity will have an approved security review before it is placed in service.

1.19 Has the Chief Information Officer (CIO) and/or the Chief Security Officer (CSO) designated this information system as requiring an

- Independent risk assessment
- Independent security test and evaluation
- Other risk assessment and/or security testing procedure, *etc.* Clarity is included in the general security services (GSS) "enclave" (group).
- Not applicable.

Please explain your response:

1.20 Based on the information that you have provided thus far, if:

- The information you are collecting does not includes information about individuals if you answered **NO** to questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14 and/or 1.16, then:

The information system (IT application or paper files) does not contain information about individuals nor does it have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

A Privacy Impact Assessment is **not required**.

- The information you are collecting does include information about individuals, and you answered **YES** to questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14, and /or 1.15, then:

The information system (IT application or paper files) does contain information about individuals, or it does have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

The information system **requires** a Privacy Impact Assessment (PIA).