Exhibit 9

Version Number: 01-2015

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

Privacy Impact Assessment
for the
CEN18 Enterprise Applications

Reviewed by: _____, Bureau Chief Privacy Officer

4/19/18

☑ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

☐ Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

LISA MARTIN

Digitally signed by LISA MARTIN
DN: c=US, o=U.S. Government, ou=Department of Commerce, ou=Office of the Secretary, cn=LISA MARTIN, 0.9.2342.19200300.100.1.1=13001000105292
Date: 2018.06.26 14:19:48 -04'00'

Dr. Catrina D. Purvis

Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer Date

U.S. Department of Commerce Privacy Impact Assessment
U.S. Census Bureau CEN18 Enterprise Applications

Unique Project Identifier: 006-000401700

Introduction: System Description

(a) a general description of the information in the system;

The CEN18 Enterprise Applications system is the functional management framework used to deliver applications to end users of the U.S. Census Bureau network. The CEN18 Enterprise Applications system includes several applications that maintain or collect personally identifiable information (PII). These applications are:

- an enterprise-level data tracking system;
- a general support system for internal data management,
- a transaction-based system
- a relational database management system, and
- a concurrent analysis and estimation system (CAES),

Some examples of survey and census information maintained by this system are personal names, personal addresses, personal contact information (telephone numbers, email address), business information, occupation, medical information, tax information, etc. The systems reside in Census Bureau's Bowie Computing center. The components that collect PII/BII do not reside in the cloud.

(b) a description of a typical transaction conducted on the system;

The purpose of the enterprise-level data tracking system is to ensure data consistency, data integrity, and generate meaningful data information through data management, tracking, and reporting for Census Bureau collections.

The general support system for CEN18 provides internal data management within the Census Bureau collections. This system allows users to request access to datasets, and when approved, users are granted access to the datasets within a secure environment provisioned by the system. Census Bureau datasets are for internal use by employees, and are capable of containing protected or administrative information.

The transaction-based system within CEN18 serves as the primary mechanism for operational control across surveys for data collection. The system can be considered an operational brain that determines operational workflow based on pre-existing protocols.

The relational database management system stores and retrieves data as requested by other software applications. This system provides both a testing, development and production environment for optimum functionality.

The CAES serves as the enterprise-wide analytics platform for surveys and censuses. This system allows statisticians within census and survey projects to perform statistical models using census and survey response data, paradata, administrative records, and many other types of data. The system will receive PII including Identifying Numbers, General Personal Data, and Work-Related Data. The PII is received from other information systems that collect, maintain and disseminate Census and Survey data.

(c) any information sharing conducted by the system

The enterprise-level data tracking system does not share information.

The general support system shares information within the Census Bureau by querying indexed metadata and by sending email to data owners, administrators, and other application users.

The relational database management system does not share information.

The transaction-based system shares demographic survey, Decennial, and Economic Census information within the Census Bureau and with the Department of Commerce, that is used to determine new survey content, support electronic collections, for statistical purposes, and to create datasets for the Census Bureau.

The Concurrent Analysis and Estimation System (CAES) is an environment for use by researchers to make decisions during the data collection phase of a survey or a Census. The CAES system will provide the researcher with any data that they request as input and will output and send decision based data only to other systems. This could include things such as case level intervention codes, a stop work decision, or best time of day to contact respondents. CAES does not provide a mechanism for sharing PII/BII with other systems.

(d) a citation of the legal authority to collect PII and/or BII;

The legal authorities to collect PII and/or BII for CEN18 are:

5 U.S.C. 301
13 U.S.C. Chapter 9, and Sections: 6, 8(b), 9, 131, 132, 141, 161, 182, 193, 196
15 C.F.R. Part 30 and 19 C.F.R. Section 24.53
18 U.S.C. 2510-2521
26 U.S.C. 6103(j) and
Foreign Trade Statistical Regulations or its successor document, the Foreign Trade Regulations

(e) the Federal Information Processing Standard (FIPS) 199 security impact category for the system

The Federal Information Processing Standard (FIPS) 199 category for this system is 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):					

_x___ This is an existing information system without changes that create new privacy risks.

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*		e. File/Case ID		i. Credit Card	X
b. Taxpayer ID	X	f. Driver's License	X	j. Financial Account	X
c. Employer ID	X	g. Passport		k. Financial Transaction	X
d. Employee ID	X	h. Alien Registration		l. Vehicle Identifier	X
m. Other identifying numbers (specify):					
*Explanation for the need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	X	g. Date of Birth	X	m. Religion	
b. Maiden Name	X	h. Place of Birth	X	n. Financial Information	X
c. Alias	X	i. Home Address	X	o. Medical Information	X
d. Gender	X	j. Telephone Number	X	p. Military Service	X
e. Age	X	k. Email Address	X	q. Physical Characteristics	X
f. Race/Ethnicity	X	l. Education	X	r. Mother's Maiden Name	X
s. Other general personal data (specify):					

Work-Related Data (WRD)

a. Occupation	X	d. Telephone Number	X	g. Salary	X
b. Job Title	X	e. Email Address	X	h. Work History	X
c. Work Address	X	f. Business Associates	X		
i. Other work-related data (specify):					

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

Government Sources					
Within the Bureau	x	Other DOC Bureaus	x	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 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. *(Check all that apply.)*

Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)			
Smart Cards		Biometrics	
Caller-ID		Personal Identity Verification (PIV) Cards	
Other (specify):			

X	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.

Section 3: System Supported Activities

3.1 Indicate IT system supported activities, which raise privacy risks/concerns. *(Check all that apply.)*

Activities			
Audio recordings		Building entry readers	
Video surveillance		Electronic purchase transactions	
Other (specify):			

X	There are not any IT system supported activities, which raise privacy risks/concerns.

Section 4: Purpose of the System

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. *(Check all that apply.)*

Purpose			
To determine eligibility		For administering human resources programs	
For administrative matters	X	To promote information sharing initiatives	X
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 (multi-session)	
Other (specify): For research and statistical purposes			

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).

The PII/BII maintained for administrative purposes: This IT system maintains first name, last name, address, email address, etc. to ensure that mandatory survey or statistical, information is ready for internal Census use. The information pertains and is in reference to federal employees/contractors conducting the surveys and the public.

The PII/BII maintained for statistical and research purposes: The data maintained by this IT system is collected from other IT systems that collect censuses and surveys (e.g., responses and statuses) and is used to direct data collection efforts. It is also used to inform program areas within the Census Bureau (responsible for survey and census questionnaire mail out) whom to send survey and census forms to. The IT system gathers response data from the data collection modes to send it to the survey and census processing IT systems in a standardized way. This information enables the Census Bureau to fulfill its legal obligation to provide mandated statistics. The information pertains to members of the public.

The PII/BII maintained for information sharing initiatives: This information is collected and shared within the Census Bureau and the Department of Commerce to create datasets for various types of censuses and surveys. This information enables the Census Bureau to fulfill its legal obligation to enhance its information sharing initiatives. The information pertains to members of the public.

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	X
DOC bureaus	X		
Federal agencies			
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.

6.2 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. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage: CEN01, CEN03, CEN04, CEN05, CEN07, CEN08, CEN10, CEN11, CEN13, CEN16, CEN17, CEN24, CEN26, CEN33 The CEN18 IT system uses a multitude of security controls mandated by the Federal Information Security Management Act of 2002 (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 at rest, and various physical controls at Census facilities that house Information Technology systems. The Census Bureau also deploys an enterprise Data Loss Protection (DLP) solution as well.
	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.3 Identify the class of users who will have access to the IT system and the PII/BII. *(Check all that apply.)*

Class of Users			
General Public		Government Employees	X
Contractors	X		
Other (specify):			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. *(Check all that apply.)*

x	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
x	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: https://www.census.gov/about/policies/privacy/privacy-policy.html	
	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.

	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how:
x	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: PII/BII is pulled from other Census Bureau Information Systems, therefore there is not an opportunity to decline to provide PII/BII at the CEN18 system level.

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

	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
x	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: PII/BII is pulled from other Census Bureau Information Systems, therefore there is not an opportunity to consent to particular uses of PII/BII at the CEN18 system level.

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
x	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: PII/BII is pulled from other Census Bureau Information Systems, therefore there is not an opportunity to review/update PII/BII at the CEN18 system level.

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. Authorizations for users occur yearly, at a minimum in accordance with applicable Bureau, Agency, and Federal policies/guidelines. In addition, audit logs are in place and assessed per NIST control *AU-03, Content of Audit records*.
x	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): July 20, 2017 ☐ This is a new system. The A&A date will be provided when the A&A package is approved.
x	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.

x	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POAM).
x	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
	Contracts with customers establish 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.

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 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 DLP solution as well.

Section 9: Privacy Act

9.1 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 and number *(list all that apply)*: COMMERCE/CENSUS-2, Employee Productivity Measurement Records: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-2.html COMMERCE/CENSUS-3, Special Censuses, Surveys, and Other Studies: http://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 COMMERCE/CENSUS-5, Decennial Census Program: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html COMMERCE/CENSUS-7, Special Censuses of Population Conducted for State and Local Government: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-7.html COMMERCE/CENSUS-8, Statistical Administration Records Systems: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-8.html COMMERCE/CENSUS-9, Longitudinal Employer Household Dynamics System http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-9.html COMMERCE/CENSUS-12, Foreign Trade Statistics: http://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-12.html
	Yes, a SORN has been submitted to the Department for approval on (date).
	No, a SORN is not being created.

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 3.2 GRS 4.1, GRS 4.2, GRS 4.3 Demographic Directorate N1-29-99-5, N1-29-89-3, N1-29-87-3, N1-29-86-3, NC1-29-85-1, NC1-29-79-7 Economics Directorate N1-029-10-2, N1-029-10-3, N1-029-12-004, N1-029-10-4 Company Statistics Division N1-29-10-1 Economic Surveys Division N1-29-03-1NC1-29-80-15, NC1-29-79-4, NC1-29-78-15 NC1-29-78-8 Manufacturing and Construction Division NC1-29-81-10 Decennial Directorate N1-29-05-01, N1-29-10-5 American Community Survey DAA-0029-2015-0001
	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:
	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	
Degaussing		Deleting	x
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Levels

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.

	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/BII collected can be directly used to identify individuals
X	Quantity of PII	Provide explanation: The collection is for demographic, Economic Surveys, and other surveys, and therefore, a severe or catastrophic number of individuals would be affected if there was loss, theft or compromise of the data.
X	Data Field Sensitivity	Provide explanation: The PII/BII, alone or in combination, are directly usable in other contexts and make the individual or organization vulnerable to harms, such as identity theft, embarrassment, loss of trust, or costs.
X	Context of Use	Provide explanation: Disclosure of the act of collecting and using the PII/BII in this IT system or the PII/BII itself may result in severe or catastrophic harm to the individual or organization.
X	Obligation to Protect Confidentiality	Provide explanation: PII/BII collected is required to be protected in accordance Title 13 collections. Violations may result in severe civil or criminal penalties.
X	Access to and Location of PII	PII/BII is located on computers controlled by the Census Bureau or on mobile devices or storage media. Access is limited to certain populations of the Census Bureau's workforce and limited to Special Sworn Status individuals. Access is only allowed by organization-owned equipment outside of the physical locations, and only with a secured connection.
X	Identifiability	Provide explanation: PII/BII collected can be directly used to identify individuals

Section 12: Analysis

12.1 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.

12.2 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.