NC Department of Information Technology

AB103: Completing a Privacy Threshold Analysis

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Content

This document provides guidance on why and how to complete a Privacy Threshold Analysis (PTA). The following topics are addressed:

- Importance of Data Security

- Overview of Privacy Threshold Analysis Process

- Roles and Responsibilities of Key Stakeholders

- How to Create, Submit, and Update a Privacy Threshold Analysis

- Support Resources

Learning Objectives

After reviewing this document, you should be able to do the following:

- Articulate the importance of Data Security and why the Privacy Threshold Analysis process is needed

- Understand the Privacy Threshold Analysis process and how it relates to the IT procurement process

- Understand the roles and responsibilities of the key stakeholders in the Privacy Threshold Analysis process

- Complete, submit, and update a Privacy Threshold Analysis

- Know where to go to get more information and support

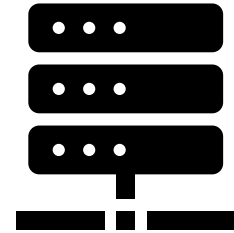# Importance of the Privacy Threshold Analysis and Data Security

The State CIO is mandated by NC General Statutes to safeguard North Carolina's information and supporting infrastructure against unauthorized use, disclosure, modification, damage or loss.

The PTA:

- Identifies programs and systems that are privacy-sensitive (i.e., involve Restricted or Highly Restricted data per the Statewide Data Classification & Handling Policy)
- Demonstrates the inclusion of privacy considerations during the review of a program or system
- Provides a record of the program or system and its privacy requirements to the Enterprise Security Risk Management Office (ESRMO)
- Demonstrates compliance with privacy laws and regulations
- Only needs to completed by Executive Branch State Agencies

Generally, a PTA is required before a program or system containing any State data becomes operational. N.C.G.S. § 132-1.10 establishes the following reasons for conducting a privacy analysis:

- Government should collect the information only for legitimate purposes or when required by law
- Social security numbers collected by an agency must be relevant to the purpose for which collected and shall not be collected until and unless the need for social security numbers has been clearly documented
- Restrict the use of social security numbers for any purpose other than the purpose stated

Overview of Privacy Threshold Analysis Process

The following describes the purpose of PTAs and when/if they need to be renewed:

- The PTA is a required document that serves as the official determination by the ESRMO as to whether a State program or system is considered privacy sensitive, and if additional documentation and security controls are required

- PTAs expire and must be reviewed and renewed (if needed) every year, or when a change to the system environment and security posture occurs

Note: _The online PTA form is available to anyone with access to the ESRMO_ SharePoint _site. PTAs are considered high level information about the types of data used in State solutions/systems. As such, PTAs do not warrant additional protections and granular permissions. Therefore, all PTAs submitted via the online form are viewable by anyone with access to the ESRMO SharePoint site._

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Roles and Responsibilities of Key Stakeholders

There are multiple stakeholders in the PTA process, and all must work together to gain PTA approval.

- The **Business Owner** or designee of an agency system/solution is responsible for completing a PTA in cooperation with the agency's security officer/representative

- Once a PTA is complete and approved by the **agency's security office**, the agency's security officer/representative will then submit the PTA to the ESRMO for review

- The **ESRMO** will then review and approve a submitted PTA, unless revisions are needed

- If a concern is identified in a submitted PTA, the ESRMO will coordinate with the agency security officer/representative to make any necessary corrections

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How to Complete, Submit, and Update a Privacy Threshold Analysis (1 of 2)

The following describes the process for submitting PTAs via the new online form:

1. Use the SharePoint interface to create/start new PTAs. You can also use this link to Start a New PTA.
2. Click "New" to begin a new PTA form. A PTA can be created by a business owner, project manager, security liaison, or anyone familiar with the solution/system being documented.
3. All questions and fields in the PTA form should be answered. If the question has multiple selections for the answer that do not apply, choose "None" or "None of the above". If the answer to a question is a free form text field, you may put "NA" or "Does not apply" if that answer is applicable.
4. For a list of fields and questions in the new PTA form, see Section VIII. Questions/Fields in New PTA Form.
5. The Project or System name should either be your application name from the Application Portfolio Management (APM) tool or your project name from Touchdown.
6. Select the appropriate option for **PRIVACY DETERMINATION** based on the answered questions.
7. Use the **Attachments** field at the bottom of the form to attach **_non-sensitive documentation_** that is relevant to the PTA. **Note:** Do not attach sensitive documentation to a PTA form (e.g., third-party attestations, PEN test findings, vulnerability reports).
8. The **Agency Review and Approval** section is **_ONLY_** for the agency security officer/representative to modify. Likewise, the **ESRMO Review and Approval** section is **_ONLY_** for the ESRMO to modify.
9. Press the "Save" button to save and submit a PTA.

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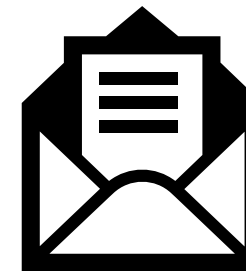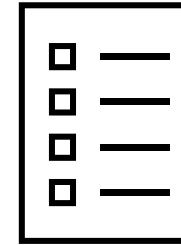
10. Once a PTA has been saved, the submitter and agency security officer/representative who was identified in the PTA form will receive an email notification.
11. Once the agency security officer/representative approves a PTA, an email notification will be sent to the ESRMO for review/approval. When the ESRMO approves a PTA, an email notification will be sent to the submitter and security liaison indicating the PTA has been completed/approved.
12. Approved **PTAs are valid for one (1) year** and must be renewed annually, if needed.
13. Use the SharePoint interface to update existing PTAs and re-submit for review and approval.

Support Resources

The ESRMO provides multiple resources to guide agencies through the PTA process.

- Please visit this [ESRMO PTA website](#) for further information and Points of Contact

- [The Privacy Threshold Analysis Submission and Renewal Guide](#) provides more details on the PTA process overall