



Privacy Threshold Analysis

Version number: 01-2014

Page 1 of 7

PRIVACY THRESHOLD ANALYSIS (PTA)

**This form is used to determine whether
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Intergovernmental Affairs (IGA) Stakeholder Customer Satisfaction Survey (1660-0130)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Office of External Affairs (OEA)
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Development
Date first developed:	Upon OMB and PRA approval	Pilot launch date:	N/A
Date of last PTA update	N/A	Pilot end date:	N/A
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Robert Nadeau		
Office:	OEA, Intergovernmental Affairs Division	Title:	Acting Director
Phone:	202-212-5193	Email:	Robert.Nadeau@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.



Privacy Threshold Analysis

Version number: 01-2014

Page 3 of 7

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: New PTA

Within FEMA's Office of External Affairs, the Intergovernmental Affairs Division will be fielding a customer satisfaction survey to collect feedback from state, local, tribal, territorial, and other stakeholders. The survey will be conducted through online software (Survey Monkey). FEMA will push-out the survey via email to the members of the OEA Intergovernmental Affairs Division listserv. This survey will allow the Intergovernmental Affairs Division to revise the services, resources, and initiatives available for Intergovernmental Affairs Stakeholders.

2. Does this system employ any of the following technologies:

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

- ☐ Closed Circuit Television (CCTV)
- ☐ Social Media
- ☐ Web portal¹ (e.g., SharePoint)
- ☐ Contact Lists
- ☒ None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information?

Please check all that apply.

- ☒ This program does not collect any personally identifiable information²
- ☐ Members of the public
- ☐ DHS employees/contractors (list components):
- ☐ Contractors working on behalf of DHS
- ☐ Employees of other federal agencies

4. What specific information about individuals is collected, generated or retained?

¹ Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

² DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



Privacy Threshold Analysis

Version number: 01-2014

Page 4 of 7

No information about individuals is collected, generated or retained. Survey Monkey will be customized so as not to save IP addresses.	
4(a) Does the project, program, or system retrieve information by personal identifier?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:	Click here to enter text.
4(d) If yes, please describe the uses of the SSNs within the project, program, or system:	Click here to enter text.
4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.

³ When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

⁴ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in Xacta.



Privacy Threshold Analysis

Version number: 01-2014

Page 5 of 7

6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Choose an item. Please describe applicable information sharing governance in place: N/A
7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: IP addresses will not be saved by Survey Monkey. <input type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?⁴	<input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

⁴ FIPS 199 is the [Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.



Privacy Threshold Analysis

Version number: 01-2014

Page 6 of 7

Component Privacy Office Reviewer:	Lane Raffray
Date submitted to Component Privacy Office:	March 26, 2014
Date submitted to DHS Privacy Office:	March 31, 2014
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
FEMA recommends that the collection is not privacy sensitive and that the PTA is sufficient at this time.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
PCTS Workflow Number:	1014334
Date approved by DHS Privacy Office:	April 2, 2014
PTA Expiration Date	April 2, 2017

DESIGNATION

Privacy Sensitive System:	No If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	<input checked="" type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.
PIA:	Choose an item.



Privacy Threshold Analysis

Version number: 01-2014

Page 7 of 7

	If covered by existing PIA, please list: Click here to enter text.
SORN:	Choose an item.
	If covered by existing SORN, please list: Click here to enter text.
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with the FEMA Privacy Office's recommendation that 1660-0130 is a non-privacy sensitive system. No PIA or SORN coverage is required at this time because no PII is collected, stored, maintained, or shared by this survey.</p> <p>FEMA has sent a copy of the survey to the DHS Privacy Office. The survey contains no PII and does not pose any privacy risks. A new PTA is required if this survey changes or starts to collect PII.</p>	