



Homeland Security

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
571-227-3813, pia@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
Version date: February 2, 2007
Page 1 of 6

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 the DHS Privacy Office:

Rebecca J. Richards
Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 571-227-3813
Fax: 571-227-4171

PIA@dhs.gov

Upon receipt, 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 DHSOnline and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 571-227-3813, and fax: 571-227-4717.



PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.
Upon receipt, the DHS Privacy Office will review this form
and may request additional information.

SUMMARY INFORMATION

DATE submitted for review: June 6, 2007

NAME of Project: <Approval and Coordination of requirements to use NETC for Extracurricular Training Activities.>

Name of Component: Federal Emergency Management Agency

Name of Project Manager: <Merril Sollenberger>

Email for Project Manager: <merril.sollenberger@dhs.gov>

Phone number for Project Manger: <301 447-1179>

TYPE of Project:

Information Technology and/or System*

A Notice of Proposed Rule Making or a Final Rule.

Other: <Information gathering FEMA Form 75-10, Request for Housing Accommodations; and FEMA form 75-11, Request for Use of NETC Facilities.>

* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those 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).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



SPECIFIC QUESTIONS

1. Describe the project and its purpose:

The National Emergency Training Center (NETC) is a FEMA facility that houses the Emergency Management Institute (EMI) and the National Fire Academy (NFA). NETC provides training and educational programs for Federal, State and local personnel in hazard mitigation, emergency response and preparedness, fire prevention and control, disaster response, and long-term disaster recovery. Special groups are sponsored by EMI, NFA or other FEMA organizations and may use NETC facilities to conduct activities closely related to and in direct support of their activities. Such groups include other Federal departments and agencies, groups chartered by Congress such as the American Red Cross, State and local governments, volunteer groups, and national and international associations representing State and local governments. Two FEMA forms are completed to conduct activities at NETC. One form is FEMA Form 75-10, Request for Housing Accommodations, and the other is FEMA Form 75-11, Request for Use of NETC Facilities. The FEMA Form 75-10 includes the requirement of a person's social security number. Steps are currently being taken to remove that requirement on the FEMA Form 75-10.

2. Status of Project:

- This is a new development effort.
 This an existing project.

Date first developed: October 1, 1981

Date last updated: November 1, 2004

Same information was required on both forms as original but was updated to comply with OMB requirements.

3. If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?

- No. Please continue to the next question.
 Yes. Is there a log kept of communication traffic?
 No. Please continue to the next question.
 Yes. What type of data is recorded in the log? (Please choose all that apply.)
 Header



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Page 4 of 6

Payload Please describe the data that is logged.

<Please list the data elements in the log.>



4. Could the project relate in any way to an individual?*

- No. Please skip ahead to question 6.
 Yes. Please provide a general description, below.

For FEMA Form 75-10, Request for Housing Accommodations, the personal items that are required for completion include a person's name, gender, and social security number. Please note that efforts are underway to remove the requirement for a person's social security number. This form is used to assign lodging to people who require lodging at NETC.

5. What information about individuals could be collected, generated or retained?

The information collected, generated but not retained includes their name, gender and social security number. Efforts are underway to alter the form and remove the requirement for a person's social security number.

6. Is there a Certification & Accreditation record within OCIO's FISMA tracking system?

- Unknown.
 No.
 Yes. Please indicate the determinations for each of the following:

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

* Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.



PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office:

NAME of the DHS Privacy Office Reviewer: <Please enter name of reviewer.>

DESIGNATION:

- This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.
- This IS a Privacy Sensitive System
 - PTA sufficient at this time
 - A PIA is required
 - National Security System
 - Legacy System
 - HR System

DHS PRIVACY OFFICE COMMENTS