



**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
June 15, 2006 Version
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) under the E-Government Act of 2002 and the Homeland Security Act of 2002 is required.

Please complete the form and return for review by 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

rebecca.richards@dhs.gov

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

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: 9/15/2006

NAME of Project: Private Sector Clearance Program Roster (PSCPR)

Name of Component: PREP, OIP, Infrastructure Partnership Division

Name of Project Manager: R. James Caverly, Director

Email for Project Manager: Robert.Caverly@dhs.gov

Phone number for Project Manager: 202-282-8409

TYPE of Project:

Information Technology and/or System

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.

A Notice of Proposed Rule Making or a Final Rule.



Specific Questions

1. Describe the project and its purpose:

Protecting critical and key infrastructures requires cooperation between government and private industry. It is the policy of the Department of Homeland Security [DHS] to share pertinent information regarding infrastructure protection with the private sector, which at times must be classified information. The private sector official must be cleared for a federal security clearance prior to receiving classified information from the government. The Private Sector Security Clearance Program [PSSCP] was developed to provide the means to accomplish the task of granting security clearances to the private sector officials. The Private Sector Clearance Program Roster (PSCPR) is used to track those Private Sector individuals involved in the clearance process.

2. Status of Project:

This is a new development effort.

This an existing project

Date first developed: August 2004

Date last updated: August 24, 2006

< The data system and physical files are updated daily with additions or deletions accordingly as data information is received. >

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

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.



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Page 4 of 6

No. The Assessment is complete. Please send to the DHS Privacy Office.

Yes. Please answer the following questions.

The PSCPR relates entirely to individuals from the private sector who apply for or who have been granted federal security clearances.



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

Once nominated for a DHS sponsored security clearance, the individual submits the following: a completed SF86 Questionnaire for National Security Positions; fingerprint cards; general & medical releases; and a release for DHS to obtain a credit report. Some, or all, of the aforementioned documents are maintained at the Office of Security, 7th & D Street, as well as at the Glebe Road facility. All electronic mail and telephonic notation are maintained in the respective individual's file at the Glebe Road facility. An Access Data System contains each individual's personal identification information, employment information, and security clearance information. As security procedures are strictly adhered to, all physical files and electronic data are locked up when not attended.

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

X Do not know.

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



PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: October 5, 2006

NAME of the DHS Privacy Office Reviewer: Rebecca J. Richards

DESIGNATION: This system is designated:

A Privacy Sensitive System

Not a Privacy Sensitive System – *In its current version.*
This determination may change as the system itself changes over time.

DHS PRIVACY OFFICE COMMENTS:

A PIA will be required due to the collection of PII from individuals.