



## PRIVACY THRESHOLD ANALYSIS (PTA)

### DHS WEB PORTALS

**This form is used to determine whether the DHS Web Portals Privacy Impact Assessment (PIA) covers the relevant portal.**

Many DHS operations and projects require collaboration and communication amongst affected stakeholders. One method of effectuating such collaboration is the establishment of an online “portal” allowing authorized users to obtain, post and exchange information, access common resources, and generally communicate with similarly situated and interested individuals. DHS has written the DHS Web Portals PIA to document these informational and collaboration-based portals in operation at DHS and its Components, which collect, use, maintain, and share limited personally identifiable information about individuals who are “members” of the portal or who seek to gain access to the portal “potential members.”

To determine whether your portal is covered please review the DHS Web Portals PIA, 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:

Rebecca J. Richards  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780  
PIA@dhs.gov

Upon receipt, the DHS Privacy Office will review this form. If the DHS Privacy Office determines that your portal is covered, the name of your project to Appendix A of the Web Portals PIA. If the Privacy Office determines that your portal is not covered, we will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
703-235-0780, pia@dhs.gov  
www.dhs.gov/privacy

**Privacy Threshold Analysis**

**Version date: July 14, 2009**

*Page 2 of 7*

### **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: July 20, 2009**

**NAME of Project: First Responder Communities of Practice (FR CoP)**

**Name of Component: Science and Technology**

**Name of Project Manager: King Waters**

**Email for Project Manager: king.waters@dhs.gov**

**Phone number for Project Manger: 202-254-6766**



## SPECIFIC QUESTIONS

**1. Describe the project and its purpose:**

DHS S&T Directorate's First Responder Technologies (R-Tech) program is developing a secure web application to provide the nation's First Responders with a platform they can use to collaborate on important issues that affect the safety and security of the nation. The First Responders Community of Practice (FR CoP) application will serve federal, state, local and tribal First Responders in fostering information sharing, communication, collaboration and innovation. The system will be owned by DHS S&T and hosted at a DHS data center. The system will be operated by S&T and S&T contractors, who will have access to system user registration data.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed:

Date last updated:

<Please provide a general description of the update.>

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

First and Last Name

Email Address

Phone Number

Business Affiliation

Mailing Address

Supervisor Information

Other:

REQUIRED: First Name, Last Name, E-Mail, Discipline(s), Job Title, Primary Work Zip, Primary Work City, and Primary Work State.

REQUIRED FOR USERS WHO REQUIRE VETTING (See PTA #6): Sponsor First Name, Sponsor Last Name, Sponsor Title, Sponsor E-Mail, and Sponsor Organization Phone Number.

OPTIONAL: Organization Name, Retired (Y/N), Work Phone Number, Primary Work Zip Extension, Time Period With Organization, Profile Picture, Professional Bio (free text), Professional Certifications, Professional Associations, and Interests. Also OPTIONAL and related to a users education: School Name, Dates Attended, and Degree Obtained.



## Privacy Threshold Analysis

Version date: July 14, 2009

Page 4 of 7

### 4. What information is collected for security questions<sup>1</sup>?

Mothers Maiden Name

Social Security Number

Date of Birth

Other: <Please list any additional information that is collected from an individual for the security questions.>

### 5. Is the information collected directly from the individuals seeking membership to the informational/collaboration-based portal?

Yes.

No. Please describe the information source and collection method.

<Please describe the information source and collection method.>

### 6. Please describe how individuals are verified during the portal registration process.

Email Supervisor

Phone Supervisor

Other: FR CoP users will fall in to four "vetting" categories when they register:

1. Users with existing/active FR CoP accounts will be authorized to invite colleagues/contacts relevant to the mission of FR CoP to join the system (after being asked to actively acknowledge that the individual they are inviting is indeed a First Responder). No further vetting will be required for individuals who are invited by existing/active members. NOTE: The system will be developed to automatically record this relationship (who a user was invited by and who the user has invited).

2. Designated DHS personnel (approved by the FR CoP System Owner) will be authorized to invite individuals to register for FR CoP. Designated Contractors will be permitted to recommend prospective users to the FR CoP System Owner for approval. No further vetting will be required for individuals officially invited to register.

---

<sup>1</sup> The Privacy Office encourages Components to collect non-sensitive PII as an alternative to sensitive PII wherever possible, including for registration purposes. If your Component seeks coverage by this PIA and collects sensitive PII for registration purposes, please consult with the Privacy Office and provide justification for the collection of this information. The Privacy Office will then determine whether the relevant portal may be covered by this PIA.



## Privacy Threshold Analysis

Version date: July 14, 2009

Page 5 of 7

3. Prospective users who register for an FR CoP account using a .mil or .gov email address will be processed without further vetting if they acknowledge, via the registration form, that they are indeed a First Responder or regularly work with First Responders (making them a relevant FR CoP system stakeholder).

4. Prospective users who register without an explicit invitation (and therefor do not fall into any of the previous three categories) will be manually vetted by designated DHS personnel. Data provided by the prospective user during the registration process (to include First and Last Name, E-Mail, Discipline(s), Organization Name, Work Phone, Primary Work Zip, Primary Work State, Sponsor First and Last Name, Sponsor Title, Sponsor E-mail, and Sponsor Organization Phone Number), will be used to confirm the First Responder affiliation of the requestor before granting access to the system.

No verification is performed.

7. **Is the personally identifiable information exchanged on the portal limited to members' contact information?**

Yes.

No.

8. **Is the personally identifiable information collected, used, or exchanged limited to the purpose(s) of facilitating registration, providing information to, and collaboration among authorized members?**

Yes.

No.

9. **Can web portal member routinely post commercial or publicly available data containing PII?**

Yes.

No.



**Privacy Threshold Analysis**

**Version date: July 14, 2009**

*Page 6 of 7*

**10. Is an appropriate Privacy Act notice (e)(3) statement given to the potential member outlining the uses of personally identifiable information?**

Yes. Please attach the (e)(3) statement.

No.

**11. Has an Authority to Operate from the Chief Information Security Officer been granted to the portal or to the larger information technology system on which the portal resides?**

No.

Yes. Please provide the date of the ATO and 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: July 28, 2009

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

### DESIGNATION

This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System

#### Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other:

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
  - System covered by existing PIA: DHS-Wide Portals PIA
  - A new PIA is required.
  - A PIA Update is required.
- A SORN is required
  - System covered by existing SORN: DHS/ALL-004; DHS/ALL-002
  - A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS