



# 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: April 13, 2009**  
*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 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 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](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780, and fax: 703-235-0442.



## 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:** January 30, 2009

**NAME of Project:** Citizen Corps Affiliate Programs and Organizations Application

**Name of Component:** Federal Emergency Management Agency

**Name of Project Manager:** Penny Burke

**Email for Project Manager:** penny.burke@dhs.gov

**Phone number for Project Manger:** 202-786-9610

**TYPE of Project:**

Information Technology and/or System \*

A Notice of Proposed Rule Making or a Final Rule.

Other: <Please describe the type of project including paper based Privacy Act system of records.>

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\* 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:**

Citizen Corps Affiliate Programs and Organizations offer communities resources for public education, outreach, and training; represent volunteers interested in helping to make their community safer; or offer volunteer service opportunities to support first responders, disaster relief activities, and community safety efforts. Providing formal recognition to these programs and similar organizations by affiliating them with Citizen Corps assists the program reach its goal of having every American participate in making their communities and families safer. In order to ensure that interested parties appropriately further the Citizen Corps mission, Citizen Corps requests supporting information from those programs and organizations seeking to become affiliates. Currently, there are 27 Citizen Corps Affiliates and we would like to extend our Citizen Corps Affiliate Programs and Organizations Application (1660-0097) Office of Management and Budget (OMB) Paper Work Reduction Act Clearance for 3 years.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed: July 12, 2006

Date last updated: July 12, 2006

There are no content changes to the Citizen Corps Affiliate Programs and Organizations Application 1660-0097. This request is to extend our application clearance.

**3. Could the project relate in any way to an individual?<sup>1</sup>**

No. Please skip ahead to the next question.

Yes. Please provide a general description, below.

The individual information collected is personnel contacts of the Citizen Corps Affiliate Applicant used for communication between FEMA and said applicant. The individual contact information includes:

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<sup>1</sup> 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.



- name,
- phone number,
- email address,
- And business physical address.

No personal non-professional information is required.

**4. Do you collect, process, or retain information on: (Please check all that apply)**

- DHS Employees
- Contractors working on behalf of DHS
- The Public

**5. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)**

- No.
- Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

<Please provide the function of the SSN and the legal authority to do so.>

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

In order to ensure that Citizen Corps affiliates only with those programs and organizations that are capable of supporting its mission, Citizen Corps will request the following information from not-for-profit and governmental organizations that would like to become affiliates:

- A written request for membership and a statement of intent to meet Citizen Corps' conditions for membership;
- A copy of the organization's Constitution or charter, and bylaws, with evidence therein of their commitment to non-discrimination in hiring and in the provision of services;
- A brief history of the organization, including its mission statement, membership, and examples of past practices;
- A copy of the Internal Revenue Service's certification of the organization's 501(c)(3) status or a state certification, if the organization is not-for-profit entity;



- A statement as to how the organization plans to further the Citizen Corps mission;
- A statement as to how the organization will work with Citizen Corps Councils at the national, state, tribal, or local levels;
- Names and titles of administrative personnel or points of contact; and Address and telecommunications information, including e-mail and web site addresses.

This information can be submitted in letter format and is reviewed by DHS/FEMA personnel who are working with the Citizen Corps program.

**7. 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

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

**8. Can the system be accessed remotely?**

No.

Yes.

**9. When remote access is allowed, is the access accomplished by a virtual private network (VPN)?**

Yes

No



10. **Is Personally Identifiable Information<sup>2</sup> physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)**

No.

Yes.

11. **Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems?**

No

Yes. Please list:

12. **Are there regular data extractions from the system?**

No.

Yes. Are these extractions included as part of the Certification and Accreditation<sup>3</sup>?

Yes.

No.

13. **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

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<sup>2</sup> Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

<sup>3</sup> This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: April 22, 2009

NAME of the DHS Privacy Office Reviewer: Nathan Coleman, Acting Director Privacy Compliance

### 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:
  - A new PIA is required.
  - A PIA Update is required.
- A SORN is required
  - System covered by existing SORN: DHS/FEMA-006
  - A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS