



## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**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:

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.



## 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: May 13, 2010**

**NAME of Project: Chemical Security Awareness Training Program**

**Name of Component: National Protection and Programs Directorate**

**Name of Project Manager: Bryan McCarthy**

**Email for Project Manager: bryan.mccarthy@dhs.gov**

**Phone number for Project Manger: 703-603-5113**

**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:**

The Chemical Security Awareness Training Program (CSATP) is an Internet-based, interactive training program. The purpose of the CSATP training is to increase the level of security awareness among general employees of chemical facilities and to enhance the security of the United States. The CSATP will provide policies, procedures, and practices which govern security issues related to protection of chemical industry infrastructure assets in response to natural disasters, criminal, and terrorist acts. The CSATP is voluntary training that will be available to general employees at chemical facilities of the U.S. chemical sector.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed: July 11, 2007

Date last updated: July 11, 2007

No update to the CSATP has been made since its creation.

**3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?**

Yes.

No. Please describe the information source and collection method.

<Please describe the information source and collection method.>

**4. Does the individual have the option to decline submitting the information collected?**

Yes.

No.

**5. Is the information collected limited to non-sensitive personally identifiable information? An example of sensitive personally identifiable information is the social security number or date of birth.**

Yes.



No.

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

Information that may be collected, generated or retained includes the following: Facility Key (pre-distributed password required for registration); self-chosen User ID and Password; lost password hint and response; company name, type, and location (city and state information only); tracking of user progress within CSATP (units completed correctly); time-stamped, validation bar code for certificate of completion (linked to the User ID only); individual's name (needed to generate the certificate of completion); email address (optional) for CSATP to automatically send an electronic copy of the certificate of completion.

NOTE: The individual's name and the optional email address are not retained by the CSATP database. This information- entered only at time of certificate generation - is temporarily retained for 30 minutes before deletion. This time period allows the user sufficient time to save, print, or email an official copy of the certificate of completion.

**7. Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

**8. With whom could the information be shared?**

Specific information will not be shared.

**9. Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

**10. Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**

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: July 15, 2010

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/ALL- Contacts List
- A new PIA is required.
- A PIA Update is required.
- A SORN is required
- System covered by existing SORN:
- A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS