



**Homeland
Security**

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
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www.dhs.gov/privacy

Privacy Threshold Analysis
Version date: June 10, 2010
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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 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 from the component Privacy Office, 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 DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: January 28, 2011

Name of Project: FEMA Form 127-0-1, Debt Collection Financial Statement (1660-0011)

System Name in TAFISMA:

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Mary K. Schneider, Chief, Debt Management Unit, FEMA Finance Center

Email for Project Manager: mary.schneider@fema.gov

Phone Number for Project Manager: 540- 542-2803

Type of Project:

Information Technology and/or System.*

A Notice of Proposed Rule Making or a Final Rule.

Form or other Information Collection.

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

* 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:

FEMA Form 127-0-1, "Debt Collection Financial Statement," is sent by the FEMA Finance Center (FFC) to individual FEMA debtors to complete and submit to FEMA as support for their positions in requesting hardship consideration, to repay debts by installment payments, and for FEMA's decisions to compromise its debts. FCC has two methods of receiving correspondence from debtors. If a debtor chooses to utilize traditional mail, the mailroom scans the documentation into the National Emergency Management Information System (NEMIS) – module. If the debtor chooses to fax their correspondence, those documents are received as an electronic version through a fax communication server and uploaded into NEMIS – module. . The form is also used to locate assets if payment agreements are later defaulted upon, or if the debts must be sent to the Department of Treasury (Treasury) or the Department of Justice (DOJ), in instances where the debt exceeds \$100,000 for collection, offset programs, litigation, and/or debt compromises or terminations.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: October 1, 2000

Date last updated: October 11, 2007

Current OMB approval of this form was received by FEMA on October 11, 2007

3. From whom do you collect, process, or retain information on: (Please check all that apply)

DHS Employees.

Contractors working on behalf of DHS.

The Public.

The System does not contain any such information.

4. 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:



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This is a debt collection activity. SSNs are collected for use by FEMA to corroborate information when debtors request debt repayment by installment. SSNs are used by Treasury to locate individual records if offset activity is undertaken by them. Finally, SSNs are used by FFC to report debt forgiveness as income required on Form 1099C Cancellation of Debt should the debt be compromised or terminated.

Solicitation of the SSN is authorized under 31 U.S.C. 7701 and needed to facilitate the collection of a delinquent debt. Additionally, under 31 U.S.C. 3711, FEMA must transfer delinquent debts older than 180 days to Treasury for collection. Once submitted to Treasury the SSN is used for computer matching against sources of payments due the debtor for possible offsetting.

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

Names, Addresses, Dates of birth, SSNs, Names of employers, Employer addresses, Marital statuses, Dependents, Housing situations, Real Estate and Car ownerships, All sources of income, Names of Banks and account balances, Names of Creditors with amounts owed, monthly payment amounts, and amounts past due.

6. 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.>



7. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems¹?

No.

Yes.

Please list: NEMIS

8. 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

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: February 15, 2011

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.

¹ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in TAFISMA.



- Legacy System.
- HR System.
- Rule.
- Other: FEMA Form 127-0-1, Debt Collection Financial Statement (1660-0011)

Determination

- PTA sufficient at this time.
- Privacy compliance documentation determination in progress.
- PIA is not required at this time.
- PIA is required.
 - System covered by existing PIA: NEMIS Module's
 - New PIA is required.
 - PIA update is required.
- SORN not required at this time.
- SORN is required.
 - System covered by existing SORN: DHS/ALL-008 Department of Homeland Security Accounts Receivable System of Records October 17, 2008, 73 FR 61885
 - New SORN is required.

DHS PRIVACY OFFICE COMMENTS FEMA FORM 127-0-1, DEBT COLLECTION FINANCIAL STATEMENT 1660-0011 IS COVERED UNDER THE PIA, NEMIS MODULES AND DHS/ALL-008 ACCOUNTS RECEIVABLE SORN, WHICH INCORPORATES THE FEMA-OC DEBT COLLECTION RILES SORN FROM 1993 WHICH THIS FORM WAS PART.