



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 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
Fax: 703-235-0442

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, on DHSOnline and directly from the DHS Privacy Office via email: 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: June 30, 2011

**NAME of Project: Chemical Stockpile Emergency Preparedness Program (CSEPP) Evaluation
and Customer Satisfaction Survey**

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Thomas Warnock

Email for Project Manager: Thomas.Warnock@dhs.gov

Phone number for Project Manager: 703-605-1207

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.>**

* 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 Stockpile Emergency Preparedness Program (CSEPP) is one facet of the multi-hazard readiness program dealing with the potential of chemical spills or releases into the communities surrounding the seven U.S. chemical stockpiles (known as CSEPP sites). The program's goal is to improve preparedness to protect the people of these communities in the unlikely event of an accident involving this country's stockpiles of obsolete chemical munitions. FEMA collects the evaluation data through telephone surveys. The questions are aimed at assessing public knowledge of emergency preparedness and response actions in the event of a chemical emergency affecting any of the seven CSEPP sites.

FEMA funds the development of the survey methodology, questionnaire and data analysis in a collaborative project with the CSEPP Public Affairs Integrated Process Team (PA IPT) and IEM. Specifically the process follows these steps: 1) IEM purchases a telephone database from Genesys Sampling Systems (Genesys) in Ft. Washington, PA, that includes Random Digit Dialing (RDD) and Listed Households (LHH) data, such as telephone number and may include name and address for the completion of the surveys 2) IEM sends only the phone numbers to CR Dynamics which does the actual survey and data collection. 3) CR Dynamics uses the phone numbers to make contact and inputs survey answers. CR Dynamics returns the data (phone numbers with responses) to IEM for analysis. 4) IEM performs quality assurance as needed with the help of the CSEPP site representative, but does not ever call the public directly. 5) IEM strips the phone numbers from the survey responses and analyzes the data. 6) Once the data has been analyzed, IEM delivers the survey report to FEMA which conveys an in-depth analysis of the survey results, including specific interests of the participating sites.

Program managers will use data findings specifically to: 1) assess outreach programs' effectiveness using five national performance indicators unique to the CSEPP program, 2) measure and monitor customer satisfaction with CSEPP products and services, and 3) identify weaknesses and strengths in individual sites and program components. Results from this information collection will be shared with state, local, and other FEMA officials for subsequent action plans addressing program-wide and stockpile site-specific issues. Results will also be shared with other federal agencies that lend their expertise in specific areas of the program.

2. Status of Project:

- ☐ This is a new development effort.
- ☒ This an existing project.

Date first developed: January 1, 2005



Privacy Threshold Analysis

Version date: April 25, 2008

Page 4 of 6

Date last updated: December 1, 2010

Information will be collected for more sites than listed in the previous approval documents.

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

☐ No.

☒ Yes. Please provide a general description, below.

The program's goal is to improve preparedness to protect the people living in the area surrounding the Chemical Depot. Information is collected from these individuals to assess their current awareness and preparedness level.

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

For the purposes of data collection, a database of the telephone numbers are purchased in order to make the calls to reach individuals living in the EPZ. The database includes telephone numbers that are generated using the Random Digit Dialed (RDD) method which maybe be supplemented by Listed Households (LHH) samples. For the RDD samples only the telephone numbers are available, however, for the LHH samples the database may also include the name and address associated with the telephone numbers.

5. With whom could the information be shared?

The contact information (telephone numbers) are not shared with any entity except for the company making the telephone calls for collecting survey responses.

* 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.



Privacy Threshold Analysis

Version date: April 25, 2008

Page 5 of 6

6. Is the contact information 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.

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

☒ Yes.

☐ No. The contact information must not be universally accessible.

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

☒ Yes.

☐ No. Any additional sharing or use will require a separate PIA.

9. 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 6, 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**

- ☐ PTA sufficient at this time
- ☐ A PIA is required
- ☐ National Security System
- ☐ Legacy System
- ☐ HR System

DHS PRIVACY OFFICE COMMENTS

CSEPP is not asking for name and all information is for statistical purposes.