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**
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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
Senior 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 your 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.

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## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

| Project or Program Name: | Citizen Corps | | |
|---|---|---|---|
| Component: | Federal Emergency Management Agency (FEMA) | Office or Program: | Office of Protection and National Preparedness (PNP) |
| TAFISMA Name: | Citizen Corps | TAFISMA Number: | FEM-06753-MAJ-06753 |
| Type of Project or Program: | IT System | Project or program status: | Operational |

### PROJECT OR PROGRAM MANAGER

| Name: | Jenelle Cardone | | |
|---|---|---|---|
| Office: | PNP - Individual and Community Preparedness Division | Title: | Program Specialist |
| Phone: | (202) 786-9463 | Email: | Jenelle.Cardone@fema.dhs.gov |

### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

| Name: | Daniel Lau-Lopez | | |
|---|---|---|---|
| Phone: | (202) 646-9917 | Email: | Daniel.Lau-Lopez@associates.fema.dhs.gov |

### ROUTING INFORMATION

| Date submitted to Component Privacy Office: | July 20, 2012 |
|---|---|
| Date submitted to DHS Privacy Office: | November 29, 2012 |
| Date approved by DHS Privacy Office: | December 18, 2012 |

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## SPECIFIC PTA QUESTIONS

> ### 1. Please describe the purpose of the project or program:
> *Please provide a general description of the project and its purpose in a way a non-technical person could understand.*

The Federal Emergency Management Agency Office Protection and National Preparedness (PNP) Individual and Community Preparedness Division, administers the Citizen Corps program on behalf of the federal government. This PTA is part of Office of Budget and Management (OMB) No. 1660-0098 and the Citizen Corps system Security Authorization (SA) package.

Following the tragic events that occurred on September 11, 2001, state and local government officials have increased opportunities for citizens to become an integral part of protecting the homeland and supporting the local first responders. Officials agree that the formula for ensuring a more secure and safer homeland consists of preparedness, training, and citizen involvement in supporting first responders. In January 2002, the President of the United States launched Citizen Corps, to capture the spirit of service that emerged throughout our communities following the terrorist attacks.

The Citizen Corps mission is to strengthen collaboration between government and community leaders from all sectors to encourage citizens through education, training, and volunteer service to make communities safer, stronger, and better prepared to respond to the threats of terrorism, crime, public health issues, and disasters of all kinds. Through Citizen Corps, communities can setup and register Citizen Corps Councils (Councils) and Community Emergency Response Team (CERT) programs. The CERT program offers training that prepares people to help themselves, their families and their neighbors in the event of a disaster in their community. Councils and CERT Programs are sponsored by local emergency management or elected leaders and registry submissions are reviewed by each State and then posted on the Citizen Corps website ([www.citizencorps.gov](www.citizencorps.gov)). Approved registration of a Council or CERT program allows them to be recognized as official entities; become eligible for Homeland Security grant funding; allows for the coordination of preparedness and emergency management activities among other groups associated with Citizen Corps; promotes their local Councils to the public and become a part of the Citizen Corps national directory of Councils; and receive important updates and messages from FEMA. The Council and CERT registries support the mission of FEMA's Individual and Community Preparedness Division and Citizen Corps, to help achieve greater community resiliency nationwide. The Citizen Corps system is an online system used to facilitate all community Council and CERT programs to register in the Citizen Corps and CERT Program registries.

FEMA collects organizational registration information from local, tribal and territorial Citizen Corps Councils and CERT the [www.citizencorps.gov](www.citizencorps.gov) public-facing website. During the organization or team's registration process, personally identifiable information related to the council or team's point of contact is submitted to and maintained by FEMA. Other information such as training available, Emergency Support Function (ESF), congressional involvement, and percentage of time dedicated by the POC to council and CERT related activities is collected but only viewable by other council POC

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registered in the Citizen Corps system.

| 2. Project or Program status | | Existing | |
|---|---|---|---|
| **Date first developed:** | **January 1, 2002** | **Pilot launch date:** | Click here to enter a date. |
| **Date last updated:** | **August 17, 2012** | **Pilot end date:** | Click here to enter a date. |

| 3. From whom does the Project or Program collect, maintain, use or disseminate information? *Please check all that apply.* | ☐ DHS Employees<br><br>☐ Contractors working on behalf of DHS<br><br>☒ Members of the public<br><br>☐ This program does not collect any personally identifiable information[1] |
|---|---|

| 4. What specific information about individuals could be collected, generated or retained? |
|---|
| *Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.* |

State and Community POC information collected, maintained, and publically accessible on the website:

Name (First, Middle, and Last)

Title

Addresses (Physical and email)

Phone Number

| **Does the Project or Program use Social Security Numbers (SSNs)?** | No |
|---|---|
| **If yes, please provide the legal authority for the collection of SSNs:** | N/A |
| **If yes, please describe the uses of the SSNs within the Project or Program:** | N/A |

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[1] DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

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| | |
|---|---|
| **5. Does this system employ any of the following technologies:**<br><br>*If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.* | ☐ Closed Circuit Television (CCTV)<br><br>☐ Sharepoint-as-a-Service<br><br>☐ Social Media<br><br>☐ Mobile Application (or GPS)<br><br>☐ Web portal[2]<br><br>☒ None of the above |
| **If this project is a technology/system, does it relate solely to infrastructure?**<br><br>*For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?* | ☒ No. Please continue to next question.<br><br>☐ Yes. If a log kept of communication traffic, please answer the following question. |
| **If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.** | |
| Click here to enter text. | |

| | |
|---|---|
| **6. Does this project or program connect, receive, or share PII with any other DHS programs or systems[4]?** | ☒ No.<br><br>☐ Yes. If yes, please list:<br>Click here to enter text. |
| **7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?** | ☒ No.<br><br>☐ Yes. If yes, please list:<br>Click here to enter text. |
| **Is this external sharing pursuant to new or existing information sharing access** | Choose an item. |

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[2] Informational and collaboration-based portals in operation at DHS and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or who seek to gain access to the portal "potential members."

[3] When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

[4] 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.

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| agreement (MOU, MOA, LOI, etc.)? | Please describe applicable information sharing governance in place. Click here to enter text. |
|---|---|

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## PRIVACY THRESHOLD REVIEW

### (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

| | |
|---|---|
| **Component Privacy Office Reviewer:** | LeVar J. Sykes |
| **Date submitted to DHS Privacy Office:** | Click here to enter a date. |
| **Component Privacy Office Recommendation:** *Please include recommendation below, including what new privacy compliance documentation is needed.* | |
| Recommend new PIA be conducted and SORN (DHS/FEMA-006 - Citizen Corps Database, 73 Fed. Reg. 77785, December 19, 2008) be updated as part of the biennial review process. | |

### (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

| | |
|---|---|
| **DHS Privacy Office Reviewer:** | **Dayo Simms** |
| **Date approved by DHS Privacy Office:** | December 18, 2012 |
| **PCTS Workflow Number:** | **966909** |

### DESIGNATION

| | |
|---|---|
| **Privacy Sensitive System:** | Yes    If "no" PTA adjudication is complete. |
| **Category of System:** | IT System<br><br>If "other" is selected, please describe: Click here to enter text. |
| **Determination:** | ☐ PTA sufficient at this time.<br>☐ Privacy compliance documentation determination in progress.<br>☐ New information sharing arrangement is required.<br>☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.<br>☒ Privacy Act Statement required.<br>☒ Privacy Impact Assessment (PIA) required.<br>☒ System of Records Notice (SORN) required. |
| **PIA:** | New PIA is required.<br><br>If covered by existing PIA, please list: Click here to enter text. |
| **SORN:** | System covered by existing SORN<br><br>If covered by existing SORN, please list: DHS/FEMA-006 - Citizen Corps Database |

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| December 19, 2008 73 FR 77785 |
|---|

**DHS Privacy Office Comments:**
*Please describe rationale for privacy compliance determination above.*

PRIV agrees that the Citizen Corps requires a PIA to mitigate the risks associated with the collection and web publication of information from members of the public. We also agree that the SORN that covers this collection is DHS/FEMA-006. In developing this PIA, please be sure to incorporate all uses of the information, including the registration process for Citizen Corps. The website allows members to sign in to the FEMA system, the PIA should address this aspect of the program and discuss the applicable web portal functions that are not addressed in this PTA. Additionally, the Privacy Act statements are not adequate on the website. Please revise these statements and clearly address the applicable SORN and the consequences for not providing the requested information. Before applicants provide information, there should be a clear PA statement which specifically states that this information may be posted on the website.