



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



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

**Date Submitted for Review: July 2, 2012**

**Name of Project: Crisis Counseling Assistance and Training Program – Immediate and Regular Services Program**

**System Name in TAFISMA: Not Applicable**

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

**Name of Project Manager: Tanya Stevenson**

**Email for Project Manager: Tanya.Stevenson@dhs.gov**

**Phone Number for Project Manager: 202-212-5719**

**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:**

The Crisis Counseling Assistance and Training Program (CCP) consist of two grant programs entitled the Immediate Services Program (ISP) and Regular Services Program (RSP). The CCP provides supplemental funding to States, U.S. Territories, and Federally Recognized Tribes after a Presidential disaster declaration. The ISP program is available for a limited period of time not to exceed 60 days from the date of declaration, unless an RSP application for longer-term funding is submitted. In that case, immediate services funding may be continued until the RSP application has been approved or disapproved. The RSP provides funding for up to nine months from the date awarded. The information submitted in the application is provided on specific disasters for the consideration of funding to States, U.S. Territories, and federally recognized Tribes, to provide services for community outreach, consultation and public education, group and individual crisis counseling, referral and resource linkage and coping techniques.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: 03/07/2010

To add the Regular Services Application (RSP) to an existing collection in use under OMB #1660-0085.

**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



## Privacy Threshold Analysis

Version date: June 10, 2010

Page 4 of 6

legal authority to do so:

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

The Point of Contact for the State Mental Health Authority provides: name, title, agency, agency address, work email address, work phone number, and signature on the RSP application.

The Governor's Authorized Representative provides: name, title, agency, agency address, work email, work phone number, and signature.

The following information may also be collected for a "Preparer", "Point of Contact," "Alternate point of contact," "Crisis Counseling Assistance and Training Program (CCP) Provider Contact/Manager," or "Consultant:" name, agency/organization, agency/organization address, phone number, and email address.

The following personally identifiable information may be collected from a "Service Provider:" email and director's name.

"Trainers" may provide: name and agency/organization affiliation.

### 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 systems<sup>1</sup>?

No.

---

<sup>1</sup> 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.



Yes.

Please list:

**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: July 13, 2012

Name of the DHS Privacy Office Reviewer: Dayo Simms

### 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: Information Collection Form

#### Determination



## Privacy Threshold Analysis

Version date: June 10, 2010

Page 6 of 6

- 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:  
[DHS/FEMA/PIA-013-Grant Management Programs](#), July 14, 2009
  - New PIA is required.
  - PIA update is required.
- SORN not required at this time.
- SORN is required.
  - System covered by existing SORN: [DHS/FEMA 004 Grant Management Information Files](#), August 7, 2009
  - New SORN is required.

### DHS PRIVACY OFFICE COMMENTS:

The Crisis Counseling Assistance and Training Program- Immediate and Regular Services Program is covered under an existing PIA DHS/FEMA/PIA-013-Grant Management Programs and SORN DHS/FEMA 004 Grant Management Information Files. The update to add a form which captures contact information for the Regular Services Program is also covered under the aforementioned privacy documents. The PTA is sufficient for this update. All of the data elements involved in this collection comply with the existing PTA and SORN.