



## **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: 202-343-1717

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](http://www.dhs.gov/privacy), on DHSCconnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	Training.fema.gov		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Emergency Management Institute
<b>TAFISMA Name:</b>	Training.fema.gov	<b>TAFISMA Number:</b>	FEM-05808-MAJ--5808
<b>Type of Project or Program:</b>	IT System	<b>Project or program status:</b>	Operational

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Dana Moat		
<b>Office:</b>	Emergency Management Institute	<b>Title:</b>	Project Manager
<b>Phone:</b>	301-447-1922	<b>Email:</b>	Dana.moat@fema.dhs.gov

### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

<b>Name:</b>	Denise Maruca		
<b>Phone:</b>	301-447-1186	<b>Email:</b>	Denise.Maruca@fema.dhs.gov

### ROUTING INFORMATION

<b>Date submitted to Component Privacy Office:</b>	November 30, 2012
<b>Date submitted to DHS Privacy Office:</b>	February 5, 2013
<b>Date approved by DHS Privacy Office:</b>	February 15, 2013



## 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 (FEMA), Protection and National Preparedness (PNP) Directorate owns and manages the "Training.fema.gov" system and website. The purpose of this system is to collect and display information related to training offered by state emergency management and FEMA regional organizations. Courses are available to FEMA employees and contractors (permanent and disaster); federal partners; state, tribal, and local emergency managers and first responders; volunteer organizations; and the general public. Training.fema.gov captures state training activity data, activity title, delivery funding source, and number of participants for all FEMA and state developed training activities. Training.fema.gov maintains course completion information for student official and unofficial transcripts. In order for Independent Study courses to be included in a transcript, the student must provide personally identifiable information (PII) in the form of their full name and social security number (SSN). Information is collected from FEMA employees and contractors (permanent and disaster); federal partners; state, tribal, and local emergency managers and first responders; volunteer organizations; and the general public one time for the purpose of class registration.

### 2. Project or Program status

Existing

<b>Date first developed:</b>	<b>October 1, 2002</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date last updated:</b>	<b>November 1, 2009</b>	<b>Pilot end date:</b>	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
- Contractors working on behalf of DHS
- Members of the public
- This program does not collect any personally identifiable information<sup>1</sup>

### 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.*

Student Names, business address, business phone number, SSNs and course information associated with

<sup>1</sup>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.



that student.	
<b>Does the Project or Program use Social Security Numbers (SSNs)?</b>	Yes
<b>If yes, please provide the legal authority for the collection of SSNs:</b>	Executive Orders 13478, and 9397, and the Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c).
<b>If yes, please describe the uses of the SSNs within the Project or Program:</b>	SSNs are used as unique identifiers. FEMA is in the process of replacing SSN with a Student Identification (SID) number as a unique identifier. SSNs are not publically accessible and encryption is used while the data is in transit and at rest.

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

<sup>2</sup> 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.”

<sup>3</sup>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.



<b>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>7. Does this project or program connect, receive, or share PII with any external(non-DHS) partners or systems?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: Transcript information may be shared with educational institutions only at the request of the student.
<b>Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	Choose an item. Please describe applicable information sharing governance in place. <a href="#">Click here to enter text.</a>

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<sup>4</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.



## PRIVACY THRESHOLD REVIEW

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

<b>Component Privacy Office Reviewer:</b>	LeVar J. Sykes
<b>Date submitted to DHS Privacy Office:</b>	February 5, 2013
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Recommend coverage by existing PIA (Student Training/Exercise Application and Registration Records Systems (STARRS)) and existing SORN (DHS/FEMA-011 Training and Exercise Programs).	

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

<b>DHS Privacy Office Reviewer:</b>	Dayo Simms
<b>Date approved by DHS Privacy Office:</b>	February 15, 2013
<b>PCTS Workflow Number:</b>	972490

## DESIGNATION

<b>Privacy Sensitive System:</b>	YesIf "no" PTA adjudication is complete.
<b>Category of System:</b>	IT System If "other" is selected, please describe: <a href="#">Click here to enter text.</a>
<b>Determination:</b>	<input type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input checked="" type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required.
<b>PIA:</b>	System covered by existing PIA If covered by existing PIA, please list: DHS/FEMA/PIA-022 <a href="#">Student Training/Exercise Application and Registration Records (STARRS)</a> , March 29, 2012
<b>SORN:</b>	System covered by existing SORN If covered by existing SORN, please list: <a href="#">DHS/FEMA-011 - General Training and Exercise</a>



	<a href="#">Program Records System of Records Notice</a> April 6, 2011 76 FR 19107
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
PRIV concurs with the FEMA Privacy Office Recommendation that training.fema.gov is covered by the Student Training/Exercise Application and Registration Records Systems PIA and the DHS/FEMA-011 Training and Exercise Programs SORN. Both the PIA and SORN cover the collection of information from individuals who apply to take FEMA sponsored trainings this includes both federal employees and members of the public.	