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
Version date: April 25, 2008
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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.

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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: April 9, 2009

NAME of Project: Pipeline Security Guidelines

Name of Component: Transportation Security Administration

Name of Project Manager: James Sharp

Email for Project Manager: james.sharp@dhs.gov

Phone number for Project Manger: 571-227-2179

TYPE of Project:

☐ **Information Technology and/or System***

☐ **A Notice of Proposed Rule Making or a Final Rule.**

☒ **Other:**

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* 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.

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SPECIFIC QUESTIONS

1.   **Describe the project and its purpose:**

As part of the Pipeline Security Guidelines, TSA recommends that each pipeline operator establish and implement a risk-based plan to address and document the organization's policies and procedures for managing security related threats, incidents, and responses. As part of this plan, operators are recommended to provide TSA with the 24/7 contact information of the primary and alternate security manager, and the telephone number of the company's security operations or control center. TSA will use this information to contact company in the event of a change in security threat indicators and/or incident involving the pipeline.

The information is collected on a voluntary basis from pipeline operators and not from individuals directly.

2.   **Status of Project:**

☐ This is a new development effort.

☒ This an existing project.

Date first developed:

Date last updated:

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

☐ No.

☒ Yes. Please provide a general description, below.

phone number

email address

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

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* 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.

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It is intended that individuals provide corporate issued contact information (company issued phone/cell/email), however some organizations may provide personal contact information (personal phone/cell/email) to provide 24/7 coverage.

5.   **With whom could the information be shared?**

Information will be used by TSA employees and contractors supporting Pipeline initiatives. Information is stored in a password protected Excel spreadsheet stored on user desktops and/or TSA network drive.

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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

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PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: April 14, 2009

NAME of the DHS Privacy Office Reviewer: Nathan Coleman, Acting Director, Privacy Compliance

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:

Determination

☐ PTA sufficient at this time

☐ Privacy compliance documentation determination in progress

☐ PIA is not required at this time

☒ A PIA is required

☒ System covered by existing PIA: Department of Homeland Security General Contact Lists

☐ A new PIA is required.

☐ A PIA Update is required.

☒ A SORN is required

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☒ System covered by existing SORN: Department of Homeland Security (DHS) Mailing and Other Lists System DHS/ALL-002, November 25, 2008, 73 FR 71659

☐ A new SORN is required.

DHS PRIVACY OFFICE COMMENTS