



## **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 DHSConnect 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>	<b>Individual Assistance Customer Satisfaction Surveys Collection 1660-0036</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Customer Satisfaction Analysis Section of the National Processing Service Centers Division
<b>TAFISMA Name:</b>	Click here to enter text.	<b>TAFISMA Number:</b>	Click here to enter text.
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Update

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	<b>Kyle M. Mills, P.E., Section Manager or Maggie Billing, Program Analyst</b>		
<b>Office:</b>	<b>Customer Satisfaction Analysis Section</b>	<b>Title:</b>	See Name Above
<b>Phone:</b>	<b>940 891-8500 Switchboard 940 891-8881 Kyle Mills 940 891-8709 Maggie Billing</b>	<b>Email:</b>	<a href="mailto:kyle.mills@fema.dhs.gov">kyle.mills@fema.dhs.gov</a> <a href="mailto:maggie.billing@fema.dhs.gov">maggie.billing@fema.dhs.gov</a>

### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

<b>Name:</b>	Click here to enter text.		
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	Click here to enter text.

### ROUTING INFORMATION

<b>Date submitted to Component Privacy Office:</b>	July 23, 2013
<b>Date submitted to DHS Privacy Office:</b>	September 20, 2013
<b>Date approved by DHS Privacy Office:</b>	September 23, 2013



## SPECIFIC PTA QUESTIONS

<p><b>1. Please describe the purpose of the project or program:</b> <i>Please provide a general description of the project and its purpose in a way a non-technical person could understand.</i></p> <p>FEMA’s Recovery Directorate, National Processing Service Center Division (NPSC) administers the Individual Assistance (IA) Customer Satisfaction Surveys and focus groups through the Customer Satisfaction Analysis Section. The purpose is to measure disaster survivor satisfaction with FEMA’s services and to make recommendations for improvements to those services based on the voice of the customer.</p> <p>Disaster survivor data is randomly imported from records stored in electronic data files and displayed on a screen containing the survey questions. Responses to the surveys are stored in electronic data files. Monitoring for quality assurance is recorded in an electronic file.</p> <p>This purpose is consistent with FEMA’s Strategic Plan and the mandates of Exec. Order Nos. 12862, 13411, and 13571 and the Government Performance and Results Acts (GPRA).</p>
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<b>2. Project or Program status</b>		<b>Choose an item.</b>	
<b>Date first developed:</b>	<b>1995</b>	<b>Pilot launch date:</b>	<b>N/A</b>
<b>Date last updated:</b>	<b>February 15, 2011</b>	<b>Pilot end date:</b>	<b>N/A</b>

<p><b>3. From whom does the Project or Program collect, maintain, use or disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> DHS Employees</p> <p><input checked="" type="checkbox"/> Contractors working on behalf of DHS</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> This program does not collect any personally identifiable information<sup>1</sup></p>
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<p><b>4. What specific information about individuals could be collected, generated or retained?</b> <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i></p> <p>The following data is imported and retained based on the type of survey being administered:</p> <p>1) Applicant name, phone number(s), mailing address, damaged address, disaster number, registration</p>
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<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.



identification number, date of registration, registrar name, date of loss, type of loss, damage to home, damage to personal property, damage to access, emergency needs, evacuation needs, disability needs, damage to business, current location, type of home, insurance(s), ownership, income, age, number of dependents, self-employed, referrals to other agencies, subsequent contact date, summary line from the comment, type of call, and representative name are imported from the IA Client application of the NEMIS-IA system replicated to the Enterprise Data Warehouse.

2) Temporary housing unit assignment, recommendation date, dates of approval and notification of unit assignment and acceptance dates, unit type, unit requested, unit assigned, site address and type, dates of maintenance requested and received and priority, dates issued to and completed by contractor, move out and vacate dates, sale date and representative name, disaster number, registration identification number are imported from the Housing Operations Management Enterprise System Client (HOMES) application of the NEMIS-IA system replicated to the Enterprise Data Warehouse.

3) First name and phone number, date of visit, and the DRC number are imported from the Disaster Recovery Center (DRC) Manager in the Recovery Information Management System (RIMS).

4) Name, phone number, date of visit, DRC number, disaster number, and registration identification number are imported from DRC Visitor Logs.

5) Name, phone number, disaster number, registration identification number, date of contact, name of representative and purpose of contact are imported from the Disaster Survivor Assistance Team (DSAT) tracking logs.

The imported data is stored with the survey responses in the Customer Satisfaction Analysis System (CSAS).

Monitoring for quality assurance is recorded through the Quality Assurance Recording System (QARS).

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

<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
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	<input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal <sup>2</sup> <input checked="" type="checkbox"/> None of the above
<b>If this project is a technology/system, does it relate solely to infrastructure?</b>  <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
<b>If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	

<b>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list:  Data received from: 1. Enterprise Data Warehouse 2. Recovery Information Management System (RIMS) and visitor or tracking logs  Monitored through the Quality Assurance Recording System (QARS).
<b>7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>Is this external sharing pursuant to new</b>	Choose an item.

<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.

<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.



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, pia@dhs.gov  
www.dhs.gov/privacy

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<p><b>or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b></p>	<p>Please describe applicable information sharing governance in place.</p> <p><a href="#">Click here to enter text.</a></p>
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## PRIVACY THRESHOLD REVIEW

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

<b>Component Privacy Office Reviewer:</b>	Lane Raffray
<b>Date submitted to DHS Privacy Office:</b>	Click here to enter a date.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: This ICR will be covered by a new PIA for the CSAS IT System that stores and maintains the survey data.	
SORN: DHS/FEMA 008 Disaster Recovery Files System of Records (April 30, 2013, 78 FR 25282) & DHS/FEMA 002 Quality Assurance Recording System (QARS) System of Records (February 15, 2011 76 FR 8758).	
The QARS SORN is being updates to include the Customer Satisfaction Analysis Section recording of its employees administering surveys and assessments to IA applicants.	

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

<b>DHS Privacy Office Reviewer:</b>	Jameson Morgan
<b>Date approved by DHS Privacy Office:</b>	September 23, 2013
<b>PCTS Workflow Number:</b>	992049

## DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If "no" PTA adjudication is complete.
<b>Category of System:</b>	IT System If "other" is selected, please describe: Click here to enter text.
<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>	New PIA is required. Covered by forthcoming PIA for the CSAS IT System.



	If covered by existing PIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	System covered by existing SORN. A SORN Update is also required. If covered by existing SORN, please list: <a href="#">DHS/FEMA-002 – Quality Assurance Recording System</a> ; <a href="#">DHS/FEMA-008 - Disaster Recovery Assistance Files</a>
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with FEMA Privacy Offices Assessment. This system requires coverage under the forthcoming PIA for the CSAS IT System, and under the DHS/FEMA 008 Disaster Recovery Assistance Files SORN, and the DHS/FEMA 002 Quality Assurance Recording System (QARS) SORN after being updated. Also, any forms developed through this program where a member of the public provides information must include an approved Privacy Act Statement.</p> <p>These surveys are used to measure disaster survivor satisfaction with FEMA’s services and to make recommendations for improvements to those services based on the voice of the customer. In order to make these surveys as accurate as possible, some PII must be collected from individuals participating in the surveys. A PIA is required for this system because it is collecting and storing a wide array of PII from members of the public, and conducting surveys using this PII for quality assurance purposes. There is currently no PIA that covers this collection of information. The forthcoming DHS/FEMAPIA for the CSAS IT system will cover the collection and storage of the survey data in this system.</p> <p>The DHS/FEMA – 008 Disaster Recovery Assistance Files SORN covers the data that is collected as a result of individuals applying for FEMA disaster assistance. This data is used to help customer service representatives contact members of the public and conduct surveys more accurately and efficiently. The DHS/FEMA – 002 QARS SORN will be updated to include the Customer Satisfaction Analysis Section recording of its employees administering surveys and assessments to Individual Assistance applicants. This update will help FEMA provide better customer service and should produce more accurate survey results. Any forms developed through this program where a member of the public provides information must include an approved Privacy Act Statement as required by the Privacy Act of 1974. This PTA should be reviewed every year until the PIA is completed.</p>	