Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, 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:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.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@hq.dhs.gov, phone: 202-343-1717.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	FEMA Form 127-0-1 Debt Collection Financial Statement (1660-0011)		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	**OCFO**
Xacta FISMA Name (if applicable):	**Unknown**	**Xacta FISMA Number (if applicable):**	**Unknown**
Type of Project or Program:	**Form or other Information Collection**	**Project or program status:**	**Update**
Date first developed:	**October 1, 2000**	**Pilot launch date:**	**N/A**
Date of last PTA update	**June 6, 2011**	**Pilot end date:**	**N/A**
ATO Status (if applicable)	Choose an item.	**ATO expiration date (if applicable):**	**N/A**

PROJECT OR PROGRAM MANAGER

Name:	**Mary K Schneider**		
Office:	**OCFO FEMA Finance Center**	**Title:**	**Chief, Debt Mgmt Unit**
Phone:	**(540) 504-1649**	**Email:**	Mary.schneider@dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	**N/A**		
Phone:	**N/A**	**Email:**	**N/A**

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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal PTA	

Please provide a general description of the project and its purpose in a way a non-technical person could understand. If this is an updated PTA, please describe what changes and/or upgrades that are triggering the update to this PTA. If this is a renewal please state whether or not there were any changes to the project, program, or system since the last version.

FEMA Finance Center (FFC) sends FEMA Form 127-0-1, "Debt Collection Financial Statement" to individuals in order to collect debts by installment payments or reach a repayment settlement. FFC has two methods of corresponding with debtors—traditional mail and fax. If a debtor chooses to utilize traditional mail, the mailroom scans the documentation to the National Emergency Management Information System (NEMIS) module.

If the debtor chooses to fax their correspondence, FEMA documents are received as an electronic version through a fax communication server and uploaded into the NEMIS module. FEMA FFC also uses the form to locate assets if payment agreements are later defaulted, or if the debts are referred to the Department of Treasury (DOT) or the Department of Justice (DOJ) where the debt exceeds $100,000 for collection, offset programs, litigation, and/or debt compromises or terminations.

2. Does this system employ any of the following technologies: *If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.*	☐ Closed Circuit Television (CCTV) ☐ Social Media ☐ Web portal[1] (e.g., SharePoint) ☐ Contact Lists ☒ None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information? *Please check all that apply.*	☐ This program does not collect any personally identifiable information[2] ☒ Members of the public ☒ DHS employees/contractors (list components): FEMA

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

[2] 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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	☒ Contractors working on behalf of DHS
	☐ Employees of other federal agencies

4. What specific information about individuals is collected, generated or retained?

Please provide a specific description of information that is collected, generated, or retained (such as names, addresses, emails, etc.) for each category of individuals.

- Name;
- Address;
- Date of Birth;
- SSN;
- Name of employer;
- Employer address;
- Marital status;
- Number of dependents;
- Housing situation;
- Real estate and car ownerships;
- All sources of income;
- Names of banks and account balances; and
- Names of creditors (including the amounts owed, monthly payment amounts, and amounts past due).

4(a) Does the project, program, or system retrieve information by personal identifier?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	☐ No. ☒ Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:	**31 U.S.C. § 7701** authorizes FEMA to collect and maintain SSNs in order to facilitate the collection of delinquent debt.

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	31 U.S.C. § 3711 requires FEMA to transfer delinquent debts older than 180 days to Treasury for collection, and once submitted to Treasury the SSN is used for computer matching against sources of payments due to the debtor for possible offsetting.
4(d) If yes, please describe the uses of the SSNs within the project, program, or system:	This is a debt collection activity. SSNs are collected for use by: (1) FEMA to corroborate information when debtors request debt repayment by installment, (2) U.S. Department of Treasury to locate individual records if offset activity is undertaken by them, and (3) FFC to report debt forgiveness as income required on Form 1099C Cancellation of Debt, should the debt be compromised or terminated.
4(e) If this project, program, or system is an information 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 next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.
4(f) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	
N/A	

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems[4]?	☐ No. ☒ Yes. If yes, please list: FEMA NEMIS (National Emergency Management Information System)
6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or	☐ No.

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[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 Xacta.

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systems?	☒ Yes. If yes, please list: U.S. Department of Treasury & U.S. Department of Justice
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Existing **Please describe applicable information sharing governance in place:** DHS/FEMA may share this information on a case-by-case basis as required by law or as necessary for a specific purpose, as described in the routine uses found in the Accounts Receivable System of Records Notice, DHS/ALL-008, (October 17, 2008, 73 FR 61885).
7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?	☒ No. Completion of the form is self-explanatory. Annual privacy training is a cyclical required responsibility of all FEMA personnel with adherence and oversight of management, and is not the responsibility of the individual program as it relates to this form. ☐ Yes. If yes, please list:
8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?	☒ No. What steps will be taken to develop and maintain the accounting: Disclosure requests/records are handled through the source system (NEMIS) and/or through the FEMA Disclosure Office. ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☐ Unknown. ☒ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High ☐ Undefined

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[4] FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

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	Integrity: ☐ Low ☐ Moderate ☐ High ☐ Undefined Availability: ☐ Low ☐ Moderate ☐ High ☐ Undefined

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LaKia Samuel
Date submitted to Component Privacy Office:	**April 11, 2014**
Date submitted to DHS Privacy Office:	April 15, 2014
Component Privacy Office Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	

- DHS/FEMA/PIA-027 – National Emergency Management Information System – Individual Assistance (NEMIS-IA) Web based and Client-based Modules

- DHS/ALL-008 - Department of Homeland Security Accounts Receivable System of Records October 17, 2008, 73 FR 61885

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
PCTS Workflow Number:	**1016010**
Date approved by DHS Privacy Office:	May 14, 2014
PTA Expiration Date	May 14, 2017

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Form/Information Collection

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	If "other" is selected, please describe: Click here to enter text.
Determination:	☐ PTA sufficient at this time.
	☐ Privacy compliance documentation determination in progress.
	☐ New information sharing arrangement is required.
	☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.
	☒ Privacy Act Statement required.
	☒ Privacy Impact Assessment (PIA) required.
	☒ System of Records Notice (SORN) required.
	☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.
	☐ A Records Schedule may be required. Contact your component Records Officer.
PIA:	System covered by existing PIA
	If covered by existing PIA, please list: DHS/FEMA/ PIA – 027 National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules
SORN:	System covered by existing SORN
	If covered by existing SORN, please list: DHS/ALL-008 - Department of Homeland Security Accounts Receivable System of Records

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

The DHS Privacy Office agrees with the FEMA Privacy Office that Debt Collection Financial Statement is a privacy sensitive system with coverage required under the DHS/FEMA/PIA – 027 NEMIS-IA PIA and the DHS/ALL – 008 Accounts Receivable SORN. A Privacy Act Statement is also required per the Privacy Act, Section e(3).

This PTA was submitted because the Debt Collection Financial Statement FORM collects PII from DHS employees, contractors, and members of the public in order to collect debts by installment payments or reach a repayment settlement.

The DHS/FEMA/PIA – 027 PIA allows FEMA to process information obtained from disaster recovery assistance applications via the Disaster Assistance Improvement Program (DAIP)/Disaster Assistance Call Center (DAC) system and uses business rules to detect and prevent ―duplication of benefits. The DHS/ALL – 008 Accounts Receivable SORN allows DHS/FEMA to collect PII in order to to keep track of debts owed to DHS.