



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 DHS Connect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Crisis Counseling Assistance and Training Program (1660-0085)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Office of Response & Recovery (ORR)/Recovery Directorate/Individual Assistance (IA) Division/Human Services (HS) Branch
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Modification
Date first developed:	March 7, 2010	Pilot launch date:	Click here to enter a date.
Date of last PTA update	July 19, 2012	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Tanya Stevenson		
Office:	ORR/RD/IA/HS	Title:	Crisis Counseling Assistance and Training Program (CCP)
Phone:	202-870-7854	Email:	Tanya.Stevenson@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.



SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

FEMA offers Crisis Counseling Assistance and Training Program (CCP) grants to U.S. states, territories, and tribal governments (grantees) following a Presidentially declared disaster as authorized by Section 416 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended, 42 U.S.C. § 5183. FEMA's Office of Response and Recovery/Recovery Directorate/Individual Assistance (IA) Division/Human Services (HS) Branch administers CCP through two grants in partnership with the Department of Health and Human Services' (HHS) Substance Abuse and Mental Health Services Agency (SAMHSA). These are the Immediate Services Program (ISP) and the Regular Services Program (RSP). These programs provide supplemental funding for community-based outreach for mental health assistance and training services. The CCP supports short-term interventions to assist survivors in understanding their current situation and reactions, mitigating stress, reviewing their disaster recovery options, linking with other helpful individuals and agencies and providing coping and emotional support.

The two CCP grant programs utilize the following forms:

FF 003-0-1 (ISP)

FEMA offers the ISP for a limited period of time, up to 60 days from the date of declaration, unless the grantee submits an RSP application for longer-term funding. In that case, FEMA may continue funding ISP until FEMA makes a decision regarding the RSP application.

FF 003-0-2 (RSP)

The RSP provides funding for up to nine months from the date awarded for community outreach, consultation and public education, group and individual crisis counseling, coping strategies, referrals and resource linkage.

Once a state/territory/tribal government agency completes the ISP or RSP application form, the grantee POC scans in the form, password protects it and securely sends it to the FEMA IA Division/HS Branch POC at either the appropriate Regional Office or Joint Field Office (JFO) for review. Then the Regional/JFO POC securely forwards the form to POCs at both the FEMA HS Branch and HHS/SAMHSA. These POCs and other designated program officials and managers review the application and either approve or deny it. After deciding, FEMA stores the form in the office hardcopy grant file at HHS/SAMHSA and on a shared drive.

FEMA renews this PTA because both FF 003-0-1 and FF 003-0-2 have been revised to reduce the amount of PII requested and to, therefore, reduce the paperwork burden for applicants. The current expiration date for the Information Collection 1660-0085 is August 31, 2014.

2. Does this system employ any of the following technologies:

If you are using any of these technologies and

Closed Circuit Television (CCTV)



<i>want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.</i>	<input type="checkbox"/> Social Media <input type="checkbox"/> Web portal ¹ (e.g., SharePoint) <input type="checkbox"/> Contact Lists <input checked="" type="checkbox"/> None of these
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3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i>	<input type="checkbox"/> This program does not collect any personally identifiable information ² <input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> DHS employees/contractors (list components): <input type="checkbox"/> Contractors working on behalf of DHS <input type="checkbox"/> Employees of other federal agencies
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4. What specific information about individuals is collected, generated or retained?	
FF 003-0-1 (ISP) The ISP grant applicant/agency's POC must provide his/her name, work email address, mailing address, and work phone number.	
FF 003-0-2 (RSP) The RSP grant applicant/agency's POC must provide his/her name, work email address, mailing address, and work phone number.	
4(a) Does the project, program, or system retrieve information by personal identifier?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
4(c) If yes, please provide the specific legal	Click here to enter text.

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.



basis and purpose for the collection of SSNs:	
4(d) If yes, please describe the uses of the SSNs within the project, program, or system:	Click here to enter text.
4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <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.
4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Choose an item. Please describe applicable information sharing governance in place:
7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:

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.



all DHS personnel?	
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?	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination? ⁴	<input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined

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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	John K. Cook
Date submitted to Component Privacy Office:	February 26, 2014
Date submitted to DHS Privacy Office:	
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: DHS/FEMA/PIA-013-Grant Management Programs	
SORN: DHS/FEMA – 009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs System of Records	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
PCTS Workflow Number:	1018041
Date approved by DHS Privacy Office:	May 12, 2014
PTA Expiration Date	May 12, 2017

DESIGNATION

Privacy Sensitive System:	Yes If “no” PTA adjudication is complete.
Category of System:	IT System If “other” is selected, please describe: Click here to enter text.
Determination:	<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 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. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact



<p>your component PRA Officer.</p> <p><input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.</p>	
PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list: DHS/FEMA/PIA – 013 Grant Management Programs,</p>
SORN:	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list: DHS/FEMA-009 - Hazard Mitigation Assistance Grant Programs</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>The DHS Privacy Office agrees with the FEMA Privacy Office that Crisis Counseling and Training Program is a privacy sensitive program with coverage required under the DHS/FEMA/PIA – 013 Grant Management Programs and the DHS/FEMA – 009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs SORN.</p> <p>This PTA was submitted because the FF 003-0-1 and FF 003-0-2 forms were revised to reduce the amount of PII requested and to, therefore, reduce the paperwork burden for applicants. This Update includes coverage under the newly published DHS/FEMA – 009 SORN. The previous PTA was covered under the DHS/FEMA – 004 SORN, however, the DHS/FEMA – 009 SORN provides more sufficient coverage to these forms. The DHS/FEMA/PIA – 013 PIA is still applicable for these forms with the reduced PII collection.</p>	