



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



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	FEMA Individual Assistance Program Effectiveness & Recovery Survey Collection 1660-0128		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Customer Satisfaction Analysis Section of the National Processing Service Centers Division
TAFISMA Name:	Click here to enter text.	TAFISMA Number:	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Update

PROJECT OR PROGRAM MANAGER

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

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

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

ROUTING INFORMATION

Date submitted to Component Privacy Office:	August 15, 2013
Date submitted to DHS Privacy Office:	August 20, 2013
Date approved by DHS Privacy Office:	September 23, 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.

FEMA's Recovery Directorate, National Processing Service Center Division administers the Individual Assistance (IA) Program Effectiveness & Recovery Survey.

This survey is conducted approximately 60-90 days after the close of the application period to measure overall satisfaction with FEMA information, support, with FEMA assistance and timeliness in correlation with expectations and current level of recovery and to gather suggestions for improvement based on the voice of the customer. Results may also be used to report quarterly performance for the Government Performance Results Act.

Additional surveys approved under separate collections are conducted at varying times in the disaster recovery period to measure customer service at those stages, such as, after registration or contact with a representative, after using the internet, after visiting a Disaster Recovery Center.

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.

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).

2. Project or Program status

Choose an item.

Date first developed:	1995	Pilot launch date:	N/A
Date last updated:	February 15, 2011	Pilot end date:	N/A

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 information¹

¹ 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.



4. What specific information about individuals could be collected, generated or retained? <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i>	
The following data is imported and retained based on the type of survey being administered: 1) Applicant name, phone number(s), mailing address, damaged address, disaster number, registration 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. 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).	
Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	N/A
If yes, please describe the uses of the SSNs within the Project or Program:	N/A

5. Does this system employ any of the following technologies: <i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i>	☐ Closed Circuit Television (CCTV) ☐ Sharepoint-as-a-Service ☐ Social Media ☐ Mobile Application (or GPS) ☐ Web portal ² ☒ None of the above
If this project is a 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>	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.

² 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."



If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.

6. Does this project or program connect, receive, or share PII with any other DHS programs or systems⁴?	☐ No. ☒ Yes. If yes, please list: Data received from the Enterprise Data Warehouse Monitored through the Quality Assurance Recording System (QARS)
7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
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. Click here to enter text.

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 TAFISMA.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Lane Raffray
Date submitted to DHS Privacy Office:	Click here to enter a date.
Component Privacy Office Recommendation: <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 updated 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)

DHS Privacy Office Reviewer:	Jameson Morgan
Date approved by DHS Privacy Office:	September 23, 2013
PCTS Workflow Number:	992047

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:	☐ 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.
PIA:	New PIA is required. Covered by forthcoming PIA for the CSAS IT System.



Privacy Threshold Analysis
Version date: November 6, 2012

Page 7 of 7

	If covered by existing PIA, please list: Click here to enter text.
SORN:	System covered by existing SORN. A SORN Update is also required. If covered by existing SORN, please list: DHS/FEMA-002 – Quality Assurance Recording System ; DHS/FEMA-008 - Disaster Recovery Assistance Files
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
The DHS Privacy Office agrees with FEMA Privacy Office's 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. A PIA is required for this system since 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. 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.	