



## **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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	Ready PSA Campaign Creative Testing Research (1660-NW88)		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Office of External Affairs
<b>Xacta FISMA Name (if applicable):</b>	N/A	<b>Xacta FISMA Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Development</b>
<b>Date first developed:</b>	<b>January 9, 2015</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date of last PTA update</b>	N/A	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Aretha Carter		
<b>Office:</b>	External Affairs/Ready	<b>Title:</b>	Ready Campaign Manager
<b>Phone:</b>	202-646-2643	<b>Email:</b>	Aretha.Carter@fema.dhs.gov

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

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



## SPECIFIC PTA QUESTIONS

<b>1. Reason for submitting the PTA: New PTA</b>
<p>FEMA’s Office of External Affairs is proposing to conduct focus groups on behalf of the Ready Communications campaign. These focus groups will test various creative communication concepts to see which ones resonate with consumers and are most effective.</p> <p>FEMA will work with its contractor The Advertising Council to implement the research with a third party research vendor. FEMA’s contractor (The Ad Council) will hire a professional focus group facility to recruit and manage the actual focus groups. The professional focus groups facility will use its own existing database of potential participants to complete the focus groups. The Ad Council will provide its chosen facilitator with a set of FEMA-approved directions for screening possible participants. The focus group facility maintains all respondent identifying information. Only the first name of each focus group respondent along with their demographic information collected in the provided recruitment screener will be shared with The Advertising Council and FEMA. No other personally identifiable information will be shared.</p>

<p><b>2. Does this system employ any of the following technologies:</b> <i>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.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Web portal<sup>1</sup> (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input checked="" type="checkbox"/> None of these</p>
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<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 type="checkbox"/> This program does not collect any personally identifiable information<sup>2</sup></p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> DHS employees/contractors (list components):</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p>
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<sup>1</sup> 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.

<sup>2</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.



	<input type="checkbox"/> Employees of other federal agencies
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<b>4. What specific information about individuals is collected, generated or retained?</b>	
From the focus group participants, FEMA’s third-party contractor will share with FEMA the following demographic data: age, gender, number of children, household composition and marital status. Without any further information, this information is not linked or linkable by FEMA to any specific individual. The third-party contractor will also share with FEMA the first name of the participants in the groups. Only the first name will be shared with FEMA, and as such this information is not PII, as first names are not uniquely linkable back to the individual participants.	
<b>4(a) Does the project, program, or system retrieve information by personal identifier?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b>	N/A
<b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	N/A
<b>4(e) If this project, program, or system is an information 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>4(f) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	
Click here to enter text.  N/A	

<b>5. Does this project, program, or system connect, receive, or share PII with any</b>	<input checked="" type="checkbox"/> No.
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<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.



<b>other DHS programs or systems<sup>4</sup>?</b>	<input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>6. Does this project, program, or system 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>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	N/A Please describe applicable information sharing governance in place:
<b>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?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
<b>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/agencies who have requested access to their PII?</b>	<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:
<b>9. Is there a FIPS 199 determination?<sup>4</sup></b>	<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:

<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 Xacta.

<sup>4</sup> 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.



	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
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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 Component Privacy Office:</b>	January 13, 2015
<b>Date submitted to DHS Privacy Office:</b>	January 22, 2015
<b>Component Privacy Office Recommendation:</b>	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
<p>This ICR is similar to others that FEMA has conducted, wherein a 3<sup>rd</sup> party uses its own existing resources to facilitate a survey/focus group on behalf of FEMA, or in this case, a FEMA contractor. Neither FEMA nor its contractor incorporates any of the PII used to facilitate this focus group into agency files and the information is not linked or linkable to agency information about those individuals.</p> <p>As such, FEMA recommends that this PTA be sufficient at this time.</p>	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	Eric M. Leckey
<b>PCTS Workflow Number:</b>	1061962
<b>Date approved by DHS Privacy Office:</b>	January 22, 2015
<b>PTA Expiration Date</b>	January 22, 2018

### DESIGNATION

<b>Privacy Sensitive System:</b>	No If "no" PTA adjudication is complete.
<b>Category of System:</b>	Form/Information Collection If "other" is selected, please describe: <a href="#">Click here to enter text.</a>
<b>Determination:</b>	<input checked="" 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 type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.	
<b>PIA:</b>	Choose an item. If covered by existing PIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>DHS Privacy Office Comments:</b>	
<i>Please describe rationale for privacy compliance determination above.</i>	
<p>This ICR is similar to others that FEMA has conducted, wherein a 3<sup>rd</sup> party uses its own existing resources to facilitate a survey/focus group on behalf of FEMA, or in this case, a FEMA contractor. Neither FEMA nor its contractor incorporates any of the PII used to facilitate this focus group into agency files and the information is not linked or linkable to agency information about those individuals. The 3<sup>rd</sup> party group facilitator does share with FEMA demographic information and the first names of group participants, however, this information is not linked or linkable to the individual participants, and therefore, is not PII.</p> <p>As such, the PTA is sufficient at this time. This adjudication is consistent with that of FEMA's similar ICRs.</p>	