



PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination by the DHS Privacy Office to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals as determined by the Chief Privacy Officer, pursuant to Section 222 of the Homeland Security Act, and to assess whether there is a need for additional Privacy Compliance Documentation. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used and managed.

Please complete the attached Privacy Threshold Analysis and submit it to your component Privacy Office. After review by your component Privacy Officer the PTA is sent to the Department's Senior Director for Privacy Compliance for action. 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 and assess whether any privacy compliance documentation is required. If compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement, or Computer Matching Agreement (CMA) – the DHS Privacy Office or component Privacy Office will send you a copy of the relevant compliance template to complete and return.



Privacy Threshold Analysis (PTA)

Specialized Template for Information Collections (IC) and Forms

The Forms-PTA is a specialized template for Information Collections and Forms. This specialized PTA must accompany all Information Collections submitted as part of the Paperwork Reduction Act process (any instrument for collection (form, survey, questionnaire, etc.) from ten or more members of the public). Components may use this PTA to assess internal, component-specific forms as well.

Form Number: FEMA Form 080-0-0-4b

Form Title: Staffing for Adequate Fire and Emergency Response
Recruitment and Retention of Volunteer Firefighters
Application (Questions ad Narrative)

Component: Federal Emergency Management Agency (FEMA) **Office:** Assistance to Firefighters Grant Programs (AFGP)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: Staffing for Adequate Fire and Emergency Response

OMB Control Number: 1660-0135 **OMB Expiration Date:** August 31, 2017
Collection status: Choose an item. **Date of last PTA (if applicable):** January 1, 2014

PROJECT OR PROGRAM MANAGER

Name: Catherine Patterson
Office: Assistance to Firefighters Grant Programs **Title:** Branch Chief
Phone: 202-786-9796 **Email:** Catherine.Patterson@fema.dhs.gov



COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	William Dunham		
Office:	Assistance to Firefighters Grant Programs	Title:	Fire Program Specialist
Phone:	202-786-9813	Email:	William.Dunham@fema.dhs.gov

SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

- a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*
If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.

This PTA is being submitted to document the volunteer firefighter recruitment and retention information collected from applicants to the Staffing for Adequate Fire and Emergency Response (SAFER) Grant Program.

The Staffing for Adequate Fire and Emergency Response (SAFER) Grant is a competitive grant opportunity that is administered by the Assistance to Firefighters Program Office. The goal of the SAFER grant program is to assist local fire departments with staffing and deployment capabilities in order to respond to emergencies, and assure that communities have adequate protection from fire and fire-related hazards. The SAFER grant application package is included in the Office of Management and Budget (OMB) Information Collection Request (ICR) 1660-0135.

The purpose of the collection is to assess the needs of each individual applicant compared to the other applicants interested in the SAFER funding opportunity. Applicants to the SAFER grant program are state, county, and municipal organizations/entities in charge of administering firefighting duties.

The SAFER application package has three components. There is the SAFER general questionnaire (FEMA Form 080-0-0-4), the Hiring of Firefighters questionnaire (FEMA Form 080-0-0-4a), and the Recruitment and Retention of Volunteer Firefighters questionnaire (FEMA Form 080-0-0-4b). For a complete application submission either the



Hiring of Firefighters Questionnaire or the Recruitment and Retention of Volunteer Firefighters Questionnaire are required with the SAFER general questionnaire.

The Recruitment and Retention of Volunteer Firefighters Questionnaire, FEMA Form 080-0-0-4b, is used to obtain information from the applicant regarding their ideal number of firefighters, current number of firefighters, marketing and recruitment efforts, new recruit training requirements. Applicants also provide a narrative with detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the grant funds were awarded. The Recruitment and Retention of Volunteer Firefighters Questionnaire does not collect any PII.

This submission is necessary in order for DHS to effectively implement a competitive grant program and meet the fiscal deadlines. The data generated through the grant application process is stored and maintained in the E-grants system. This system does not relate to any other grant application system such as Non-Disaster (ND) Grants.

- b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

The authority for Staffing for Adequate Fire and Emergency Response (SAFER) is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 et seq.), as amended.

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons. <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.

¹ Personally identifiable information means any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



<p>c. Who will complete and submit this form? (<i>Check all that apply.</i>)</p>	<p><input type="checkbox"/> The record subject of the form (e.g., the individual applicant).</p> <p><input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.).</p> <p><input type="checkbox"/> Business entity.</p> <p style="padding-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="padding-left: 80px;"><input type="checkbox"/> Yes</p> <p style="padding-left: 80px;"><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> This form will be completed by a firefighter organization's point of contact.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input type="checkbox"/> Paper.</p> <p><input type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link: https://portal.fema.gov/</i></p>
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>	
<p>The Recruitment and Retention of Volunteer Firefighters Questionnaire does not collect any PII.</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply. N/A</i></p>	
<p><input type="checkbox"/> Social Security number</p> <p><input type="checkbox"/> Alien Number (A-Number)</p> <p><input type="checkbox"/> Tax Identification Number</p> <p><input type="checkbox"/> Visa Number</p>	<p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</p> <p><input type="checkbox"/> Social Media Handle/ID</p> <p><input type="checkbox"/> Known Traveler Number</p>



<input type="checkbox"/> Passport Number <input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input type="checkbox"/> Other. <i>Please list:</i>		<input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics	
g. List the specific authority to collect SSN or these other SPII elements.			
N/A			
h. How will this information be used? What is the purpose of the collection? Describe why this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.			
N/A			
i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?		<input type="checkbox"/> Yes. Please describe how notice is provided. <input checked="" type="checkbox"/> No.	

3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input type="checkbox"/> Paper. Please describe. Click here to enter text. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Information will be stored in E-grants system. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.
b. If electronic, how does DHS input the	<input type="checkbox"/> Manually (data elements manually entered). Please describe.



<p>responses into the IT system?</p>	<p>Click here to enter text.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. Respondents enter information directly into the E-grants system. DHS does not input responses.</p>
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><input type="checkbox"/> By a unique identifier.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> An automatically generated application number is assigned to each submitted application by fiscal year of application, type of application and order submitted.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records are destroyed 10 years after final action is taken on file, but longer retention is authorized if required for business use, per PRC-12-1 (207-080-12-1).</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>The AFG staff adheres to the FEMA Disposition schedule, to ensure compliance with the records retention schedule, which outlines timelines, description of files for records destruction, and or disposal of relevant documents associated with each grant program.</p>
<p>f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i></p>	
<p><input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.</p> <p><input type="checkbox"/> Yes, information is shared <i>external</i> to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe. Click here to enter text.</p>	

² Generally, a unique identifier is considered any type of “personally identifiable information,” meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



No. Information on this form is not shared outside of the collecting office.



Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Christopher Rogers
Date submitted to component Privacy Office:	June 16, 2017
Date submitted to DHS Privacy Office:	Click here to enter a date.
Have you approved a Privacy Act Statement for this form? <i>(Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)</i>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. This form does not collect any PII.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
FEMA Privacy recommends this form be adjudicated as non-privacy sensitive.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Hannah Burgess
PCTS Workflow Number:	1146133
Date approved by DHS Privacy Office:	July 31, 2017
PTA Expiration Date	July 31, 2020

DESIGNATION

Privacy Sensitive IC or Form:	No If "no" PTA adjudication is complete.
Determination:	<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 SPII 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"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
DHS IC/Forms Review:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	e(3) statement not required. Click here to enter text.
PTA:	Updated system PTA required. Click here to enter text.
PIA:	Choose an item. If covered by existing PIA, please list: Click here to enter text.



	If a PIA update is required, please list: Click here to enter text.
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text. If a SORN update is required, please list: Click here to enter text.
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>FEMA is submitting this PTA for Form 080-0-0-4b, The Recruitment and Retention of Volunteer Firefighters Questionnaire, which is part of OMB ICR 1660-0135. This form is used to obtain information from the applicant regarding their organization’s ideal number of firefighters, current number of firefighters, marketing and recruitment efforts, and new recruit training requirements. Applicants also provide a narrative with detailed information regarding the staffing needs of the department, the financial need of the applicant, the benefits that would be realized if the grant funds were awarded. The Recruitment and Retention of Volunteer Firefighters Questionnaire does not collect any PII.</p> <p>This form is a portion of the Staffing for Adequate Fire and Emergency Response (SAFER) Grant Program. SAFER is a competitive grant opportunity that is administered by the Assistance to Firefighters Program Office. The goal of the SAFER grant program is to assist local fire departments with staffing and deployment capabilities in order to respond to emergencies, and assure that communities have adequate protection from fire and fire-related hazards.</p> <p>The Privacy Office agrees with FEMA’s recommendation that the form be adjudicated as not privacy sensitive when considered separate from the rest of the grant application information collection. However, Form 080-0-0-4b is an integral part of the collection that includes privacy sensitive forms such as FEMA Form 080-0-0-4, which require privacy compliance documentation.</p>	