



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:	008-0-0-24		
Form Title:	Youth Preparedness Council (YPC) Application Form		
Component:	Federal Emergency Management Agency (FEMA)	Office:	Individual and Community Preparedness Division

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Individual & Community Preparedness Division (ICPD) Annual Youth Preparedness Council (YPC) Application Form		
OMB Control Number:	1660-NW94	OMB Expiration Date:	Click here to enter a date.
Collection status:	New Collection	Date of last PTA (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Allison Carlock		
Office:	Individual and Community Preparedness	Title:	Program Specialist for Youth Programs
Phone:	202-786-9781	Email:	Allison.carlock@fema.dhs.gov



COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Millicent Brown		
Office:	Records Management Division	Title:	Information Collection Analyst
Phone:	202-646-2814	Email:	Millicent.Brown@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.

The Federal Emergency Management Agency (FEMA) conducts this new Privacy Threshold Analysis (PTA) as part of the Office of Management and Budget (OMB) Information Collection Resources (ICR) approval process. This PTA is part of OMB ICR 1660-NW94.

The FEMA Youth Preparedness Council (YPC) vision is to bring together youth leaders from across the country who are highly interested and engaged in advocating youth disaster preparedness and making a difference in their communities.

Members are expected to represent the youth perspective on emergency preparedness and take information back to their communities to share. Each Council member is expected to develop and complete one preparedness-related project specific to his/her region and interests. There is no minimum or maximum age requirement for YPC applicants but they must be at least in the 8th grade and not beyond 11th grade when they apply.

Youth apply using personal identifiable information (PII) such as a youth's demographic, contact information, along with information related to extracurricular activities and academic standing. FEMA Form 008-0-0-24 collects and retains, confidentially, the applicants PII for the purposes of providing acceptance/denial responses to applicants and determining a representative sample of applicants. Letters of recommendation are required, while supplemental materials highlighting past achievements are encouraged. Applicants are required to provide the name and contact telephone number of their parent(s) or guardian(s) as well as letters of recommendation that include the name and relationship of the individual providing the recommendation.



Applicants have the option to use video to record their responses to the application and submit the video as their application to the YPC.

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.*

This collection meets the requirements of 6 U.S.C. §742, “National Preparedness”, and Presidential Policy Directive – 8 (PPD-8) which emphasize the need for involvement from all sectors of society in preparing for and responding to threats and hazards. The information collected from successful and non-successful applicants will be maintained per applicable retention schedules.

2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	<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.
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input type="checkbox"/> Business entity.

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>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i></p> <p>If applicant is under 18 years of age, a parent or guardian may need to provide a name, phone number and/or email, and signature. FEMA also collects the names of individuals recommending a youth as part of the application for YPC membership.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</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>FEMA collects the following information from youth applying for membership to the FEMA Youth Preparedness Council:</p> <p>Name; Date of Birth; Age; Street Address, City, State, Zip/Postal Code; Race/ethnicity; Gender/sex; Account number; Email address; Telephone number; Education grade level; Academic records and extracurricular activities; and</p>	



Disaster preparedness/response experience (narrative format).

FEMA collects the following information from the youth applicants parent or guardian:

- Name;
- Telephone number;
- Email Address

FEMA collect the following information from individuals recommending a youth as part of the application for YPC membership:

- Name,
- Relationship to applicant,
- Narrative about the applicant

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? *Check all that apply.* No, SSNs or other Sensitive PII elements are not collected.

- | | |
|---|--|
| <input type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) |
| <input type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number |
| <input type="checkbox"/> Visa Number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input type="checkbox"/> Passport Number | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Bank Account, Credit Card, or other financial account number | <input type="checkbox"/> Biometrics |
| <input type="checkbox"/> Other. <i>Please list:</i> | |

g. List the **specific authority** to collect SSN or these other SPII elements.

N/A because SSN and SPII are not collected.

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

- Yes. Please describe how notice is provided.
An e(3) Privacy Act Statement will be provided.
- No.



DHS (Does the records subject have notice of the collection or is form filled out by third party)?	
--	--

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. Data is stored on an internal FEMA Sharepoint site which is secured from public access and only users involved have access. <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Currently, FEMA YPC files are stored on the Preparedness Directorate Shared Drive in the Youth Preparedness Council folder.
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. If applicants do not submit through online process, FEMA ICPD staff will manually input or scan the information. <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
c. How would a user search the information submitted on the forms, i.e., how is the	<input checked="" 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. By an account number <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.

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.



information retrieved?	
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	Records Schedule Identifier: ADM 4-3: Routine Program Correspondence. These are temporary files that will be destroyed when two years old or sooner, if purpose has been served.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	FEMA IT System Administrators will delete information in accordance with FEMA Records Schedule.
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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text. <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. <input checked="" type="checkbox"/> 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:	August 31, 2015
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 checked="" type="checkbox"/> Yes. Please include it with this PTA submission. <input type="checkbox"/> No. Please describe why not. Click here to enter text.
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 interim PIA coverage under DHS/FEMA/PIA-029 – Citizen Corps Program and interim SORN coverage under DHS/ALL-011 – Department of Homeland Security Biographies and Awards, as the collection is already occurring. FEMA Privacy will work with the program area to develop a Youth Preparedness Council PIA. After the PIA development, we will begin work on a SORN.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Emily Stoner
PCTS Workflow Number:	1138493
Date approved by DHS Privacy Office:	March 23, 2017
PTA Expiration Date	March 23, 2018

DESIGNATION

Privacy Sensitive IC or Form:	Yes If "no" PTA adjudication is complete.
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 SPII applies. <input checked="" 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"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
DHS IC/Forms Review:	DHS PRIV has not received this ICR/Form.
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 update is required.
PTA:	No system PTA required. Click here to enter text.
PIA:	PIA update is required. If covered by existing PIA, please list: Click here to enter text.



	If a PIA update is required, please list: DHS/FEMA/PIA-029 Citizen Corps Program
SORN:	SORN update is required. If covered by existing SORN, please list: Click here to enter text. If a SORN update is required, please list: DHS/FEMA-006 Citizen Corps Program, 78 FR 43890 (July 22, 2013)
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>DHS Privacy Office finds that FORM 1660-NW94 (Youth Preparedness Council (YPC)) is a privacy-sensitive collection, requiring both PIA and SORN coverage. The form collects sensitive Personally Identifiable Information (PII), including name, date of birth, age, home address, race/ethnicity, gender/sex, account number, email address, telephone number, education grade level, academic records and extracurricular activities, relationship to applicant, narrative about the applicant, and disaster preparedness/response experience from members of the public. Information collected in this form is used by FEMA for the purpose of providing acceptance/denial responses to applicants and determining a representative sample of applicants.</p> <p>DHS Privacy Office agrees with FEMA’s recommendation of interim PIA coverage under DHS/FEMA/PIA-029 Citizen Corps Program, which outlines FEMA’s collection, use, maintenance, retrieval, and dissemination of PII associated with points of contacts designated by Councils, CERTs, and other Citizen Corps partners. DHS Privacy Office disagrees with FEMA’s recommendation of interim SORN coverage under DHS/ALL-011 Department of Homeland Security Biographies and Awards, 73 FR 66654 (November 10, 2008). Instead DHS Privacy Office finds that better interim SORN coverage is provided under DHS/ALL-003 Department of Homeland Security General Training Records, 73 FR 71656 (November 25, 2008), which describes the Department’s collection and documentation of individuals who are provided DHS training, and DHS/FEMA-006 Citizen Corps Program, 78 FR 43890 (July 22, 2013), which describes the Department’s establishment and registration of Citizen Corps Councils and CERT programs.</p> <p>The YPC is a similar program to the Citizen Corps Program. Therefore, DHS Privacy Office recommends updating the DHS/FEMA/PIA-029 and the DHS/FEMA-006 to incorporate the YPC program and provide adequate coverage for the information being collected from this form (unique identifier, age, gender, race/ethnicity,</p>	



academic records, etc.) and the categories of individuals from which the form is collecting information (youth applicants, parent/guardian of applicant, and individuals submitting recommendations for applicant).

The Privacy Act Statement associated with this form has been updated to reflect the interim SORN coverage. The Privacy Act Statement also must be included on the application form. Once DHS/FEMA-006 has been updated, the Privacy Act Statement will need to be updated to reflect the new SORN coverage.

This PTA expires in 1 year.