



## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**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  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, 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 DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.  
Upon receipt, the DHS Privacy Office will review this form  
and may request additional information.

### SUMMARY INFORMATION

**DATE submitted for review: February 11, 2014**

**NAME of Project: Office of External Affairs Survey: Additions to Contact Database**

**Name of Component: Federal Emergency Management Agency**

**Name of Project Manager: James McIntyre**

**Email for Project Manager: James.mcintyre@fema.dhs.gov**

**Phone number for Project Manger: 202-646-3922**

**TYPE of Project:**

- Information Technology and/or System\***
- A Notice of Proposed Rule Making or a Final Rule.**
- Other: Information Collection Request**

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\* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

- “Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

- “Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



## SPECIFIC QUESTIONS

### 1. Describe the project and its purpose:

Within FEMA's Office of External Affairs, the Disaster Operations Division will be fielding a survey to collect feedback from organizations serving individuals with limited English proficiency. The Disaster Operations Division is adding a question to the survey asking respondents if they would like to receive future correspondence from FEMA about the services that the Office of External Affairs, Disaster Operations Division provides. If respondents answer in the affirmative, they will then be prompted to provide their contact information.

Information will be collected through survey's given to organizations that support Limited English Proficiency (LEP) populations during a disaster to assess and improve FEMA's outreach to those populations. These surveys will be filled out hard-copy by respondents, disseminated and collected by FEMA's Disaster Survivor Assistance Teams (DSAT) in the field. They will be then turned back into the LEP team at the Joint Field Office (JFO) who will compile the information and add into electronic database. The PII information is an optional question at the end of the survey, if respondents would like to receive future information from FEMA.

This contact information will be stored in a database apart from the survey responses and used by FEMA to contact the individuals. The organizational information will be maintained in a database to reach out to those partners in the future with general preparedness information, and response information when a new disaster occurs in their area.

The PII would be kept separate and apart from the survey answers that do not contain PII.

### 2. Status of Project:

This is a new development effort.

This an existing project.

Date first developed:

Date last updated:

<Please provide a general description of the update.>

### 3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?

Yes.



No. Please describe the information source and collection method.

<Please describe the information source and collection method.>

**4. Does the individual have the option to decline submitting the information collected?**

Yes.

No.

**5. Is the information collected limited to non-sensitive personally identifiable information? *An example of sensitive personally identifiable information is the social security number or date of birth.***

Yes.

No.

**6. What information about individuals could be collected, generated or retained?**

Information to be collected includes: first and last name, email address, state, county, name of the organization they represent (if applicable), and phone number (optional).

**7. Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

**8. With whom could the information be shared?**

The information will not be shared outside of FEMA.

**9. Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

**10. Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**



## Privacy Threshold Analysis

Version date: June 10<sup>th</sup>, 2009

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No.

Yes. Please indicate the determinations for each of the following:

Confidentiality:  Low  Moderate  High  Undefined

Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

**DATE reviewed by the DHS Privacy Office: April 2, 2014**

**NAME of the DHS Privacy Office Reviewer: Jameson Morgan**

### DESIGNATION

- This is NOT a Privacy Sensitive System** – the system contains no Personally Identifiable Information.
- This IS a Privacy Sensitive System**

#### Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other: Survey

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
- System covered by existing PIA: DHS/ALL/PIA-006 Department of Homeland Security General Contact Lists
- A new PIA is required.
- A PIA Update is required.
- A SORN is required
- System covered by existing SORN: DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System
- A new SORN is required.



## **DHS PRIVACY OFFICE COMMENTS**

The DHS Privacy Office approves EA Disaster Operations Survey Contacts as a privacy sensitive system with coverage under the DHS/ALL/PIA - 006 General Contacts List PIA and the DHS/ALL - 002 Mailing and other Lists SORN.

This survey collects limited PII for the purpose of contacting LEP individuals who would like future correspondence from FEMA about the services that the Office of External Affairs, Disaster Operations Division provides.

The information collection is consistent with the DHS/ALL/PIA - 006, which allows DHS to collect a minimal amount of contact information in order to distribute information and perform various other administrative tasks. The DHS/ALL - 002 Mailing and Other Lists SORN allows DHS to mail informational literature or responses to those who request it and for other purposes for which mailing or contact lists may be created.