



## 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](mailto: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.

|                     |   |                |  |
|---------------------|---|----------------|--|
| <b>Form Number:</b> | <b>078-0-2 and 078-0-2A</b>                       |                |  |
| <b>Form Title:</b>  | <b>National Fire Academy Long Term Evaluation</b> |                |  |
| <b>Component:</b>   | Federal Emergency Management Agency (FEMA)        | <b>Office:</b> | <b>US Fire Administration (USFA)/National Fire Academy (NFA)</b> |

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

|                          |           |                                   |                |
|--------------------------|-----------|-----------------------------------|----------------|
| <b>Collection Title:</b> |           |                                   |                |
| OMB Control Number:      | 1660-0039 | OMB Expiration Date:              | March 31, 2018 |
| Collection status:       | Extension | Date of last PTA (if applicable): | N/A            |

#### PROJECT OR PROGRAM MANAGER

|                |                       |               |                        |
|----------------|-----------------------|---------------|------------------------|
| <b>Name:</b>   | <b>Dawn Long</b>      |               |                        |
| <b>Office:</b> | National Fire Academy | <b>Title:</b> | Statistician           |
| <b>Phone:</b>  |                       | <b>Email:</b> | Dawn.long@fema.dhs.gov |

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

|                |                 |               |                                      |
|----------------|-----------------|---------------|--------------------------------------|
| <b>Name:</b>   | Millicent Brown |               |                                      |
| <b>Office:</b> | OCAO            | <b>Title:</b> | Information Collection/Forms Manager |
| <b>Phone:</b>  | 202-646-2814    | <b>Email:</b> | 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 National Fire Academy (NFA) is mandated under the Fire Prevention and Control Act of 1974 (Public Law 93-498) to provide training and education to the Nation's fire service and emergency service personnel. The state-of-the-art programs offered by the NFA serve as models of excellence and state and local fire service agencies rely heavily on the curriculum to train their personnel.

The Long-Term Evaluation (LTE) form is used to maintain the quality of NFA training programs. It is critical that courses be evaluated after students have had the opportunity to apply the knowledge and skills gained from their training. NFA students are typically state, local, tribal, and territorial firefighters. Evaluations are completed online by students after a course, as well as government officials who are identified as supervisors of NFA students. The NFA send students and supervisors a letter directing them to follow a link to the evaluation, which is completed and submitted electronically. If an email address is provided at registration, the NFA sends the letter electronically; otherwise, the NFA sends the letter via postal mail.

The LTE form does not collect any PII. However, students and supervisors will have to log on to USFA Web Farm to complete the form. USFA issue students' and supervisors' usernames and passwords in the aforementioned letter. Users are not prompted to change the password, as each is a one-time use only. Once the evaluation is submitted, the username and password become invalid. Email address and/or home address are linked to the user for administrative use only, e.g., sending reminders. Only personnel with evaluation access rights can view names and passwords. This information submitted by the user is not linked to evaluation reports.

- 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.*



FEMA-USFA-NFA will collect this data in accordance with Public Law 93-498.

| 2. Describe the IC/Form   |  |
|---|--|
| a. Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?                   | <input type="checkbox"/> Yes<br><input checked="" 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<br><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents<br><input type="checkbox"/> Non-U.S. Persons.<br><input type="checkbox"/> DHS Employees<br><input type="checkbox"/> DHS Contractors<br><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).<br><input type="checkbox"/> Legal Representative (preparer, attorney, etc.).<br><input type="checkbox"/> Business entity.<br>If a business entity, is the only information collected business contact information?<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No<br><input type="checkbox"/> Law enforcement.<br><input type="checkbox"/> DHS employee or contractor.<br><input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i><br><a href="#">Click here to enter text.</a> |

<sup>1</sup> 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.



|  |  |
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| <p>d. How do individuals complete the form?<br/><i>Check all that apply.</i></p>   | <p><input type="checkbox"/> Paper.<br/><input type="checkbox"/> Electronic. (ex: fillable PDF)<br/><input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)<br/><i>Provide link:</i><br/><a href="https://apps.usfa.fema.gov/nfacourses/lte/signIn">https://apps.usfa.fema.gov/nfacourses/lte/signIn</a></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 form only collects student feedback on a completed course or training. FEMA will not collect any personally identifiable information in the LTE form.</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. No.</i></p>  |  |
| <p><input type="checkbox"/> Social Security number<br/><input type="checkbox"/> Alien Number (A-Number)<br/><input type="checkbox"/> Tax Identification Number<br/><input type="checkbox"/> Visa Number<br/><input type="checkbox"/> Passport Number<br/><input type="checkbox"/> Bank Account, Credit Card, or other financial account number<br/><input type="checkbox"/> Other. <i>Please list:</i></p> | <p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)<br/><input type="checkbox"/> Social Media Handle/ID<br/><input type="checkbox"/> Known Traveler Number<br/><input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)<br/><input type="checkbox"/> Driver's License Number<br/><input type="checkbox"/> Biometrics</p> |
| <p>g. List the <b>specific authority</b> to collect SSN or these other SPII elements.</p>  |  |
| <p>Click here to enter text.<br/>N/A No SPII collected.</p>  |  |
| <p>h. How will this information be used? What is the purpose of the collection? Describe <b>why</b> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.</p>   |  |
| <p>Click here to enter text.<br/>N/A</p>   |  |



|  |   |
|--|---|
| <p>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>)?</p> | <p><input type="checkbox"/> Yes. Please describe how notice is provided.</p> <p><input checked="" type="checkbox"/> No.</p> |
|--|---|

| <h3>3. How will DHS store the IC/form responses?</h3>                         |   |
|---|---|
| <p>a. How will DHS store the original, completed IC/forms?</p>                | <p><input type="checkbox"/> Paper. Please describe.<br/>           Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.<br/>           The Long-term evaluation form is stored in USFA Web Farm.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.<br/>           Click here to enter text.</p> |
| <p>b. If electronic, how does DHS input the responses into the IT system?</p> | <p><input type="checkbox"/> Manually (data elements manually entered). Please describe.<br/>           Click here to enter text.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.<br/>           Once the respondent completes/submits the survey form on-line, the data automatically transmits to the database in the USFA Web Farm.</p>  |
| <p>c. How would a user search the information</p>                             | <p><input type="checkbox"/> By a unique identifier.<sup>2</sup> Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p>   |

<sup>2</sup> 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.



|  |   |
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| submitted on the forms, <i>i.e.</i> , how is the information retrieved?  | Click here to enter text.<br><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i><br>Data is retrieved in aggregate form by the dates of the courses.              |
| d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>  | In accordance with the FEMA Records Disposition schedule (File Number TNG-8) training evaluation records are TEMPORARY and are destroyed when superseded or obsolete. NARA_Auth: N1-311-86-1, Item 3A5. |
| e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?  | Records are reviewed annually for disposition of or for deletion in accordance with the FEMA Records Retention Schedule. N1-311-86-1, Item 3A5  |
| 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.<br><br><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.<br><br><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:   | <b>Christopher Rogers</b>   |
| Date submitted to component Privacy Office:  | <b>October 13, 2017</b>   |
| 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.<br><input checked="" type="checkbox"/> No. Please describe why not.<br>No PII is collected in the LTE form. |
| Component Privacy Office Recommendation:<br><i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i> |   |
| <b>FEMA Privacy recommends the LTE form be adjudicated as non-privacy sensitive.</b>   |   |





## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

|                                      |                       |
|--------------------------------------|-----------------------|
| DHS Privacy Office Reviewer:         | <b>Hannah Burgess</b> |
| PCTS Workflow Number:                | <b>1152979</b>        |
| Date approved by DHS Privacy Office: | November 14, 2017     |
| PTA Expiration Date                  | November 14, 2020     |

### DESIGNATION

|                                |  |
|--------------------------------|--|
| Privacy Sensitive IC or Form:  | <b>No If "no" PTA adjudication is complete.</b>  |
| Determination:                 | <input checked="" type="checkbox"/> PTA sufficient at this time.<br><input type="checkbox"/> Privacy compliance documentation determination in progress.<br><input type="checkbox"/> New information sharing arrangement is required.<br><input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing SPII applies.<br><input type="checkbox"/> Privacy Act Statement required.<br><input type="checkbox"/> Privacy Impact Assessment (PIA) required.<br><input type="checkbox"/> System of Records Notice (SORN) required.<br><input type="checkbox"/> Specialized training required.<br><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:         | Choose an item.<br>No Privacy Notice required  |
| PTA:                           | Choose an item.<br><b>No system PTA required</b>   |



|  |   |
|--|---|
| PIA:   | Choose an item.<br>If covered by existing PIA, please list: No PIA required<br>If a PIA update is required, please list: Click here to enter text.    |
| SORN:  | Choose an item.<br>If covered by existing SORN, please list: No SORN required<br>If a SORN update is required, please list: Click here to enter text. |
| DHS Privacy Office Comments:<br><i>Please describe rationale for privacy compliance determination above.</i>   |   |
| <p><b>FEMA is submitting this PTA to discuss the National Fire Academy (NFA) Long-Term Evaluation survey. The survey is designed to collect feedback from students and supervisors regarding the perceived value of NFA training programs once students have had the opportunity to apply skills gained in the programs.</b></p> <p><b>The survey is administered via a link sent by email or by mail, and the prior collection of contact information in order to send the link for the survey is covered by DHS/ALL/PIA-006 DHS General Contacts List and the DHS/ALL-002 DHS Mailing and Other Lists SORN.</b></p> <p><b>The survey itself does not collect any PII. The questions involve assessments of the perceived value of NFA training as applied to the student’s current job performance.</b></p> <p><b>Because no PII is collected through the survey itself, the DHS Privacy Office finds that the NFA Long-Term Evaluation form is non-privacy sensitive. No further privacy documentation is required.</b></p> |   |