



## 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>FEMA Form 516-0-1</b>		
<b>Form Title:</b>	<b>Federal Hotel and Motel Fire Safety Declaration Form</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office:</b>	U.S. Fire Administration (USFA)

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

<b>Collection Title:</b>	Federal Hotel and Motel Fire Safety Declaration Form		
<b>OMB Control Number:</b>	1660-0068	<b>OMB Expiration Date:</b>	August 31, 2018
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	August 24, 2015

#### **PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	Teresa Kaas		
<b>Office:</b>	DHS/FEMA/USFA	<b>Title:</b>	Fire Program Specialist
<b>Phone:</b>	(301) 447-1263	<b>Email:</b>	teressa.kaas@fema.dhs.gov

#### **COMPONENT INFORMATION COLLECTION/FORMS CONTACT**

<b>Name:</b>	Sherina Greene		
<b>Office:</b>	Records Management	<b>Title:</b>	Program and Management Analyst



Phone: (202) 646-4343 Email: sherina.greene@fema.dhs.gov  
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## **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 for FEMA's use of the Federal Hotel and Motel Fire Safety Declaration Form per the three-year expiration. This is a renewal PTA and there have been no changes since the last adjudication.

The U.S. Fire Administration (USFA) uses FEMA Form 516-0-1. The Federal Hotel and Motel Fire Safety Declaration Form collects business information on life safety systems related directly to fire safety in hotels, motels, and similar places of accommodation applying for inclusion on the National Master List (NML). Public Law 101-391 requires FEMA to establish and maintain a list of hotels, motels, and similar places of public accommodation meeting minimum requirements for protection of life from fire; the list is known as the National Master List (NML). The referenced law resulted from a series of deadly fires in hotels and motels, occurring in the 1970's and 1980's, with high loss of life.

The information is collected and distributed through an on-line electronic database accessed through the USFA website. Information submitted voluntarily by lodging establishments is reviewed and if the criteria meet the Hotel and Motel Fire Safety Act requirements, the hotel/motel is given a FEMA ID number and listed on the NML database. Federal travelers and the public seeking public accommodation with provisions for life safety from fire; access the NML through USFA's website on the on-line database and identify lodging establishments in the area to which they are traveling.

Property owners/general managers, or their designee/delegate ("applicants"), complete the form, providing property information including property type (i.e., Hotel/Motel, etc.), General Manager Name, Property Name, Employer/Tax Identification Number, Property



Street Address, Property/Reservation Phone Number(s), Property Fax Number, Property Email Address, Website Address (optional), and provisions for life safety from fire. The form requests specific responses from applicants as to the installation of smoke detectors in all guestrooms of properties submitted for listing on the NML. In addition, applicants must indicate if the lodging establishment has an automatic sprinkler system where the building is four stories or higher. The information is collected and distributed through an on-line electronic database accessed through the USFA website.

- 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.*

Hotel and Motel Fire Safety Act of 1974, Public Law 101-391, 15 U.S.C. § 2201 et seq. requires FEMA to establish and maintain a list of hotels, motels, and similar places of public accommodation meeting minimum requirements for protection of life from fire; the list is known as the National Master List (NML).

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input 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 <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</li> <li><input type="checkbox"/> Non-U.S. Persons.</li> </ul> <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?	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.).

<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.



<p>(Check all that apply.)</p>	<input checked="" type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> <a href="#">Click here to enter text.</a>								
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<input type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <a href="https://apps.usfa.fema.gov/hotel/main/onlineRegistration">https://apps.usfa.fema.gov/hotel/main/onlineRegistration</a>								
<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 USFA collects the following information from property owners/general managers or their designees:</p> <p>Name;          Property Street Address;          Property/Reservation Phone Number(s);          Property Fax Number; and          Property Email Address.</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.</i> <b>N/A</b></p>									
<table border="0"> <tr> <td><input type="checkbox"/> Social Security number</td> <td><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</td> </tr> <tr> <td><input type="checkbox"/> Alien Number (A-Number)</td> <td><input type="checkbox"/> Social Media Handle/ID</td> </tr> <tr> <td><input type="checkbox"/> Tax Identification Number</td> <td><input type="checkbox"/> Known Traveler Number</td> </tr> <tr> <td><input type="checkbox"/> Visa Number</td> <td></td> </tr> </table>		<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	
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<input type="checkbox"/> Visa Number									



<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 <b>specific authority</b> 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 <b>why</b> 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 checked="" type="checkbox"/> Yes. Please describe how notice is provided. A privacy notice will be provided. <input 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. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. USFA Web Farm <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 responses into the IT system?	<input type="checkbox"/> Manually (data elements manually entered). Please describe. <input checked="" type="checkbox"/> Automatically. Please describe. Applicants input responses in the NML database.
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<input type="checkbox"/> By a unique identifier. <sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> The user would search by a property name or city and/or state to identify lodging establishments in the area to which they are traveling.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	ADM-11-2 Project Files Temporary. Cut off at end of project. Destroy 5 years after cutoff.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	The USFA 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.
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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. The NML is available from the USFA website and is accessed by Government Travelers to identify lodging establishments in the area to which they are traveling. No PII will be shared.

<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.



Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

The NML is available from the USFA website and can be accessed by other federal agencies, state/local partners and the general public seeking public accommodation with provisions for life safety from fire. No PII will be shared.

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>August 25, 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. <input checked="" type="checkbox"/> No. Please describe why not. The USFA does not retrieve information by personal identifier. Therefore, no System of Record exist. However, a privacy notice will be provided
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>	
<b>FEMA Privacy recommends the following coverage:</b>  <b>PIA: DHS General Contacts List; and</b> <b>SORN: N/A.</b>	



## PRIVACY THRESHOLD ADJUDICATION

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

DHS Privacy Office Reviewer:	<b>Hannah Burgess</b>
PCTS Workflow Number:	<b>1149974</b>
Date approved by DHS Privacy Office:	September 26, 2017
PTA Expiration Date	September 26, 2020

### DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If "no" PTA adjudication is complete.</b>
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 type="checkbox"/> Privacy Act Statement required. <input checked="" 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:	DHS PRIV has approved 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:	Click here to enter text.
PTA:	Choose an item. Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: DHS/ALL/PIA-006 General Contact Lists</p> <p>If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
SORN:	<p>Choose an item.</p> <p>If covered by existing SORN, please list: <a href="#">Click here to enter text.</a></p> <p>If a SORN update is required, please list: <a href="#">Click here to enter text.</a></p>
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA is submitting this PTA for the Federal Hotel and Motel Fire Safety Declaration Form because the previous PTA has an OMB expiration date of 10/31/2018 and the collection needs to be extended.</p> <p>The U.S. Fire Administration (USFA) uses the Federal Hotel and Motel Fire Safety Declaration Form (FEMA Form 516-0-1) to collect business information on life safety systems related directly to fire safety in hotels, motels, and similar places of accommodation applying for inclusion on the National Master List (NML). The NML is established by FEMA to maintain a list of hotels, motels, and similar places of public accommodation meeting minimum requirements for protection of life from fire.</p> <p>The DHS Privacy Office finds that is a privacy sensitive form because it collects PII from members of the public.</p> <p>The DHS Privacy Office agrees with FEMA’s recommendation. A PIA is required because the form collects PII from members of the public, however a SORN is not required because information submitted on the form is retrieved by a non-personal identifier (by property name or city/state). The DHS/ALL/PIA-006 General Contact Lists PIA provides adequate coverage and describes this form as one of the qualifying programs or projects in appendix B. This form includes the necessary Privacy Notice.</p>	