



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 NUMBER 519-0-54		
Form Title:	Post Disaster Survivor Preparedness Research.		
Component:	Federal Emergency Management Agency (FEMA)	Office:	Protection and National Preparedness: Individual and Community Preparedness (ICPD)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:			
OMB Control Number:	1660-NW116	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:	Jacqueline Snelling		
Office:	Individual and Community Preparedness Division	Title:	Senior Advisor
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Sherina Greene		
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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 by FEMA’s Individual and Community Preparedness Division (ICPD) for FEMA’s use of the Post Disaster Survivor Preparedness Research Survey, FEMA Form 519-0-54. This form is a new collection.

The Individual and Community Preparedness Division is charged by FEMA with meeting the mission of providing necessary direction, coordination and guidance for emergency preparedness for the protection of life and property in the United States from Hazards (Stafford Act, Title VI, Emergency Preparedness (42 U.S.C. 5195-5195(a)). Emergency preparedness is defined as all “activities and measures designed or undertaken to prepare or minimize the effects of a hazard upon the civilian population.” The purpose of this form and collection is to obtain information from recent survivors of Hurricane Harvey, Irma, and Maria, and survivors of subsequent disasters while they have current memories of their experience. FEMA contracts with a Research Company to conduct the research and compile the collected data. A summary research report will be written and submitted to FEMA. Participant selection is dependent upon the research method being used by the research company.

Telephone surveys will utilize a dual-frame random-digit-dial sampling method which reach landline, as well a cell phones. A geographic area is defined, the area code and three-digit prefixes within the area are identified, and then the last four digits are randomly generated. Cell phone numbers are also randomly selected and therefore, no identifying information is known about the phone number. There is a science to list generation, therefore, lists of phone numbers are created by a sampling firm contracted with the telephone survey vendor.



Participants for focus group and cognitive interviews may be selected by collaborating with partner organizations within the geographical area of interest. For example, if there is a need to gain participation from survivors who have a specific functional need, we may reach out to a partner organization that can assist with recruiting participants.

The collection will use focus groups, cognitive interviews, and a quantitative survey to collect information about the attitudes and preparedness actions of survivors, the guidance and warnings they received, the actions they took, and the outcomes of their actions to better prepare the public to minimize the effects of these disasters. Focus groups are conducted by recruiting participants from within the geographic area of interest. A recruitment screener is created to ensure that participants qualify for the groups. Ten to twelve participants are recruited for eight to ten to show. Focus groups will be conducted in a location that is convenient and appropriate for participants (e.g., accessible for public transit, local public neighborhood settings, such as a library). Focus groups will be conducted by a trained facilitator familiar with the research goals and subject matter.

The information will be used to assess preparedness and how to further motivate actions that will minimize future impacts for the protection of life and property. The collection instruments will be anonymous and will not collect PII.

Privacy Mitigation

Due to the risk of re-identification, ICPD, in consultation with the FEMA Privacy Branch, decided to collect only the first three digits of survey participants' zip codes.

- 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 Stafford Act, Title VI, Emergency Preparedness (42 U.S.C. 5195-5195(a)) identifies the purpose of emergency preparedness “for the protection of life and property in the United States from hazards.” It directs that the Federal Government “provide necessary direction, coordination, and guidance” as authorized for a comprehensive emergency preparedness system for all hazards. The DHS Strategic Plan 2014-2018 includes a Goal 5.1 including the goal for “improving strategies for the mission of empowering individuals and communities to strengthen and sustain their own preparedness”. The FEMA Strategic Plan 2014-2018 references FEMA priorities for preparing individuals in Priority #1- to achieve a survivor-centric mission where “Individuals and communities know the steps to take, have the tools required, and take appropriate actions, before, during, and after disasters. The National Security Strategy of the United States, December 2017, includes the charge to “help Americans remain resilient in the face of adversity. Resilience includes the ability to withstand and recover rapidly from deliberate attacks,



accidents, natural disasters, as well as unconventional stresses, shocks, and threats to our economy and democratic system.”

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 checked="" 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? (Check all that apply.)	<input 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. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input type="checkbox"/> No <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>

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>This is a survey given over the telephone, by focus groups, and interviews conducted in person or on the phone. In-person interviews would be utilized to collect qualitative data from survivors that may be hard to reach in a large quantitative research effort, such as a telephone survey. In-person interview participants will be recruited by collaborating with a partner organization and will be held at a location that is convenient and accessible to the participant.</p> <p>FEMA contracts with a Research Company to conduct the research and compile the collected data. A summary research report will be written and submitted to FEMA.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><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>The Post Disaster Survivor Preparedness Research Survey collects demographic and contextual characteristics as they relate to preparedness from survey participants, including:</p> <ul style="list-style-type: none"> - Prior experience with disasters; - Health condition - Community Engagement; - Gender; - Age; - Number of children under 18 in household; - Race and Ethnicity - Household Income category - Geography and Location of Residence (zip code (first three digits only), state, county, territory); years at location; - Home ownership; and 	



<p>- Education</p> <p>No PII elements are collected.</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. None apply</i></p>	
<input type="checkbox"/> Social Security number <input type="checkbox"/> Alien Number (A-Number) <input type="checkbox"/> Tax Identification Number <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"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) <input type="checkbox"/> Social Media Handle/ID <input type="checkbox"/> Known Traveler Number <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics
<p>g. List the specific authority to collect SSN or these other SPII elements.</p>	
<p>No information is collected containing any SSN or other SPII elements</p>	
<p>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.</p>	
<p>No SPII is collected or used</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>	<input type="checkbox"/> Yes. Please describe how notice is provided. <input checked="" type="checkbox"/> No.

3. How will DHS store the IC/form responses?



<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. 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. FEMA Network Storage R Drive.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. For telephone survey methods, we will deliver the electronic data files in SPSS and/or Excel, as appropriate. Data files will not contain identifying information, as telephone numbers used to collect the data will be removed by the data collection firm and replaced with a unique identifier before the data are sent for analyses. For qualitative data collection methods, such as focus groups and one-on-one interviews, we will deliver summary level reports in Word. The reports will not identify participants and there will not be information in the reports that can be linked back to lists used to recruit participants.</p> <p>Data is manually entered into forms which are manually saved to the "R" drive. It is a FEMA staff member who actually enters the data into the FEMA drive.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</p>
<p>c. How would a user search the information submitted on the</p>	<p><input type="checkbox"/> By a unique identifier.² Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. 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.



forms, <i>i.e.</i> , how is the information retrieved?	<input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> All search would likely be done by types of disasters or demographic information like county or state or zip code of respondent. All focus group and interview data would be anonymous
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	ICPD records are destroyed immediately after data have been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use, per EDP 2-2.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	ICPD staff uses the collected data for studies and development of trend analysis. Records are continuously used and monitored. When they are no longer deemed useful for analysis the records will be destroyed
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.	





**Homeland
Security**

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
www.dhs.gov/privacy

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:	January 17, 2018
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 survey will not collect personally identifiable information.
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 that this PTA 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:	1156746
Date approved by DHS Privacy Office:	February 1, 2018
PTA Expiration Date	February 1, 2021

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:	Choose an item. Click here to enter text.
PTA:	Choose an item. 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.
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA is submitting this PTA to discuss a new information collection and the associated new FEMA Form 519-0-54, Post Disaster Survivor Preparedness Research Survey. FEMA will be using this collection, which includes a telephone survey and possible in-person interviews and focus group discussions, to obtain information from recent survivors of disasters about their experiences, the guidance and warnings they received, the actions they took, and the outcomes of their actions in order to better prepare the public to minimize the effects of these disasters.</p> <p>FEMA will contract with a research company to conduct the surveys and compile the collected data. Survey participants for the telephone survey will be selected randomly within a geographic area that was affected by a disaster, using the area code of the phone number to determine the geographic area. In-person interviews may be selected by collaborating with partner organizations. Participants will be asked non-PII questions about their households, their level of emergency preparedness, and their experience with the recent disaster and how it affected their preparedness level moving forward. The contracted research company will conduct the information collection and compile the data, and a summary research report will be written and submitted to FEMA.</p> <p>The DHS Privacy Office agrees that this is not a privacy-sensitive collection, and so no PIA or SORN coverage is required.</p>	