



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: | TSA Form 1904A | | |
| Form Title: | End of Course Level 1 Evaluation – Instructor-Led Classroom Training | | |
| Component: | Transportation Security Administration (TSA) | Office: | Office of Training & Development (OTD) |

IF COVERED BY THE PAPERWORK REDUCTION ACT:

| | | | |
|----------------------------|----------------------------------|--|-----------------------------|
| Collection Title: | Click here to enter text. | | |
| OMB Control Number: | 1652-0041 | OMB Expiration Date: | September 30, 2018 |
| Collection status: | Revision | Date of last PTA (if applicable): | Click here to enter a date. |

PROJECT OR PROGRAM MANAGER

| | | | |
|----------------|------------------|---------------|------------------------------|
| Name: | Virginia Beauman | | |
| Office: | OTD | Title: | Section Chief |
| Phone: | 210-396-4404 | Email: | Virginia.Beauman@tsa.dhs.gov |

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

| | | | |
|--------------|-------------|--|--|
| Name: | Glenn Stoll | | |
|--------------|-------------|--|--|



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|---------|---|--------|---|
| Office: | Information Management Program Section (IMPS), OED, OIT | Title: | Director of IMPS/Forms Management Officer |
| Phone: | 571-227-5175 | Email: | glenn.stoll@tsa.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 information obtained from the TSA 1904A, *End of Course Level 1 – Classroom Training* form provides valuable feedback to staff of the TSA OTD Canine Training Center (CTC) and is used to evaluate and improve the effectiveness and efficiency of instructional programs. The PRA is triggered in this instance for CTC because Level 1 feedback must be collected from legacy civilian canine handler students who attend either the CTC Explosives Detection Canine Handlers Course, Passenger Screening Canine Handler Course, or the Supervisor/Trainer Seminars Course. The 1904A form is an extension of OTD’s broader evaluations program and training standards, which include use of the Kirkpatrick Evaluation Model to measure and evaluate training effectiveness.

CTC students who successfully complete the above courses, complete the 1904A form to provide participant reaction to course content, materials, learning environment, and instructor performance. This provides valuable feedback to both those at the local level, such as the CTC Supervisory Air Marshal in Charge (SAC), instructional staff, and supervisors, and to those evaluating data at the headquarters level, with respect to the presentation and receipt of training material. The feedback is used to improve the course curriculum and course of instruction.

Since obtaining OMB approval on the 1904A form on September 27, 2013, OTD has sought to streamline OTD’s Level 1 evaluation collection into a single, consolidated Level 1 Evaluation form that can be used for all students, both TSA employees acting within the scope of their duties and the legacy CTC civilian students in any of the courses listed above. To accomplish this, OTD is revising the previously OMB approved 1904A. The revisions are primarily cosmetic, non-substantive changes, particularly from a PRA perspective (since there are no new added imperatives to collect additional information beyond what is already requested via the approved



TSA Form 1904A). Changes include adding three more Instructor sections, as there is the potential for more than 3 instructors to deliver the training, eliminating redundancies in the evaluation items, updating the rating scale from a numerical (N/A; 1-5) to a radial rating scale (Strongly Disagree, Disagree, etc.) in accordance with DHS.

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.*

Aviation and Transportation Security Act (ATSA) 49 USC 107 – 71; Government Performance and Results Act of 1993, Public Law 103-62

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? <i>(Check all that apply.)</i> | <input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons. <input checked="" type="checkbox"/> DHS Employees <input checked="" 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. <p style="margin-left: 40px;">If a business entity, is the only information collected business contact information?</p> <input type="checkbox"/> Yes <input type="checkbox"/> No |

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.



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| | <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text. |
| <p>d. How do individuals complete the form? <i>Check all that apply.</i></p> | <input type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> |
| <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>No PII is allowed on the survey as noted on the 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.</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>N/A</p> | |



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| <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>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 checked="" type="checkbox"/> Yes. Please describe how notice is provided. The individuals are notified the first day of class and prior to the actual evaluation being conducted.</p> <p><input type="checkbox"/> No.</p> |

| 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. TSA's Performance Information Management System (PIMS)</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. Completed forms are submitted by TSA employees to TSA's Online Learning Center. Completed forms are submitted by non-TSA personnel through TSA's authorized survey tool, Vovici. The evaluation responses are then exported from OLC and Vovici via Excel into PIMS.</p> |



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| | <input type="checkbox"/> Automatically. |
| 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. ² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text. <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> User may search the information submitted on the forms by course title, course date range, or TSA Online Learning Center (OLC) identifier. |
| d. What is the records retention schedule(s)? <i>Include the records schedule number.</i> | Records are managed in accordance with TSA's Records Disposition Schedule 1900.1.1-a/GRS 2.6 Item 010. They are destroyed when 3 years old, or 3 years after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use. |
| e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule? | <p>CTC Response: Dates are established on the folders and the responsible persons review the folders annually to ensure compliance with file maintenance requirements.</p> <p>HQ Response: Records will be retained indefinitely as they are required for business use, namely comparison of past results with future results and curriculum reviews on a five-year cycle, at a minimum. Individual records will not be retrieved, rather results will be viewed in the aggregate.</p> |
| f. Is any of this information shared outside of the original program/office? | <input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. <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. |

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.



Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.

DRAFT



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

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| Component Privacy Office Reviewer: | Jennifer L. Schmidt |
| Date submitted to component Privacy Office: | November 8, 2017 |
| Date submitted to DHS Privacy Office: | November 9, 2017 |
| 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. Not privacy sensitive collection. |
| 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> | |
| TSA Privacy office recommends approval of this PTA. TSA Form 1904A, <i>End of Course Level 1 – Classroom Training</i> does not collect PII and the responses are not retrieved by a personal identifier. No PIA or SORN coverage is necessary. | |



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

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| DHS Privacy Office Reviewer: | Sean McGuinness |
| PCTS Workflow Number: | 1153550 |
| Date approved by DHS Privacy Office: | November 14, 2017 |
| PTA Expiration Date | November 14, 2020 |

DESIGNATION

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| 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: | 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 not required. Click here to enter text. |
| PTA: | No system PTA required. Click here to enter text. |
| PIA: | Choose an item. If covered by existing PIA, please list: Click here to enter text. |



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| | 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. |
| DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i> | |
| <p>DHS Privacy Office finds that the End of Course Level 1 Evaluation – Instructor-Led Classroom Training, TSA Form 1904A is non-privacy sensitive as it does not collect PII.</p> <p>TSA Form 1904A allows Canine Training Center (CTC) students to provide feedback to the staff of the TSA OTD CTC with their opinions on the courses. No PII is collected on this form as the student answers the survey with the following options (Strongly Agree, Disagree, etc.) along with three sections students can provide comments on their learning experience. This form is being revised to streamline OTD’s Level 1 evaluation collection into a single, consolidated Level 1 Evaluation form that can be used for all students, both TSA employees acting within the scope of their duties and the legacy CTC civilian students in any of the courses involved.</p> <p>PIA/SORN coverage is not required as TSA Form 1904A does not collect PII.</p> <p>A Privacy Act Statement is not required as information on this form is not retrieved by personal identifier.</p> | |