



## 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 070-0-0-1</b>		
<b>Form Title:</b>	<b>National Fire Department Census</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office:</b>	<b>U.S. Fire Administration</b>

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

<b>Collection Title:</b>	<b>National Fire Department Census</b>		
<b>OMB Control Number:</b>	<b>1660-0070</b>	<b>OMB Expiration Date:</b>	
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	<a href="#">Click here to enter a date.</a>

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Gayle Kelch		
<b>Office:</b>	National Fire Data Center	<b>Title:</b>	Statistician
<b>Phone:</b>	301-447-1154	<b>Email:</b>	gayle.kelch@fema.dhs.gov

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Millicent Brown		
<b>Office:</b>	Forms Management/Information Collections	<b>Title:</b>	Information Collection/Forms Manager



Mission Support			
Phone:	202-646-2814	Email:	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 USFA is working to identify all fire departments in the United States to develop a database that includes information related to their demographics, capabilities, and activities. The database is used by the USFA to guide programmatic decisions and to provide the Fire Service and the public with information about fire departments. Additionally, USFA maintains the census database for disseminating critical fire safety and prevention information to departments. The FEMA Critical Infrastructure Protection (CIP) program uses the census for the purpose of distributing sensitive information to senior fire and EMS personnel. FEMA collects limited PII (basic contact information) of fire department personnel submitting the form; however the majority of the information maintained in the database is aggregate data, related to the fire department and not the individual.

Public Law 93-498 provides for the gathering and analyzing of data as deemed useful and applicable for fire departments. The National Fire Department Census evolved from recommendations of the Blue Ribbon Panel. In the spring of 1998, the Director of the Federal Emergency Management Agency (FEMA) convened a Blue Ribbon Panel of prominent members of the U.S. fire service to review the structure, mission, and purpose of the U.S. Fire Administration (USFA) and to make recommendations for the future of the Federal fire focus. The Blue Ribbon Panel noted the lack of a comprehensive list of fire departments and baseline data for the definition of the composition, capabilities, and activities of the nation's fire service. Their recommendation was for the USFA to develop a fire department census.

The purpose of this collection is to assist in the development of a fire service census that captures demographic information that will help clarify the perception issue and establish baselines and benchmarks for USFA activities, and identify and maintain the demographics of fire departments in the United States by conducting a fire services census.

USFA receives many requests from fire service organizations and the public for information related to fire departments, including total number of departments, number of stations per department, population protected, and number of firefighters. Additionally, USFA maintains the census for the purpose of disseminating fire safety and prevention information to fire departments across the country.



<p>b. List the DHS (or component) authorities to collect, store, and use this information.  <i>If this information will be stored and used by a specific DHS component, list the component-specific authorities.</i></p>
<p>U.S. Fire Administration          Public Law 93-498 provides for the gathering and analyzing of data as deemed useful and applicable for fire departments.</p>

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? (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.

<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.



	<input checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> Fire department personnel representing the fire department (e.g., Fire Chief).		
d. How do individuals complete the form? <i>Check all that apply.</i>	<input checked="" type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i>		
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>			
The USFA collects the following PII data elements from fire department points of contact: <ul style="list-style-type: none"> <li>• Name;</li> <li>• Telephone number;</li> <li>• Fax number; and</li> <li>• Email address.</li> </ul>			
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>			
<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <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> </td> <td style="width: 50%; vertical-align: top;"> <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           </td> </tr> </table>		<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
<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		
g. List the <b>specific authority</b> to collect SSN or these other SPII elements.			
Sensitive Personally Identifiable Information (SPII) is not collected on this form.			



<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>Sensitive Personally Identifiable Information (SPII) is not collected on this form.</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. A privacy notice will be provided.</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. USFA Web Farm</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. Fire department respondents enter the data manually. Once the data is in the system, then they can retrieve the submitted information at a later date and provide updates/changes to only specific data elements (i.e., there is no need to resubmit all of the information if there are no changes).</p> <p><input type="checkbox"/> Automatically. Please describe.</p>



	Click here to enter text.
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. Click here to enter text. <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> The forms are retrieved by using the Fire Department Identification Number (FDID) and state location.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	Fire department records are maintained until the fire department notifies USFA that the department no longer exists or has merged with another fire department, per FEMA Records Schedule EDP-2-4.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	The US Fire Administration adheres to the FEMA Disposition schedule, which provides the timeframes for records destruction, and or disposal of relevant documents associated with each Preparedness 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 type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.  <input checked="" 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. The census data are available publicly on USFA’s website with the exception of the contact person’s information ( <i>i.e.</i> , name, telephone number, fax number, and email address fields) and the specialized services provided data.  <input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.

<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.



**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>November 18, 2016</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 information collected will be not be stored in a system of record. Therefore, no Privacy Act Statement is needed. 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/ALL/PIA – 006 Department of Homeland Security General Contact List.</b>	
<b>SORN: Not applicable; the application does not collect or retrieve information using personal identifiers.</b>	



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Kevin Mullinix</b>
PCTS Workflow Number:	<b>1137543</b>
Date approved by DHS Privacy Office:	February 14, 2017
PTA Expiration Date	February 14, 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:	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:	<b>e(3) statement not required.</b> Privacy Notice is required.
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 Department of Homeland Security General Contact List</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>Choose an item.</p> <p>If covered by existing SORN, please list: Click here to enter text.</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p><b>The DHS Privacy Office finds that the National Fire Department Census FORM 070-0-0-1 is a privacy sensitive collection, requiring PIA coverage. FEMA U.S. Fire Administration (USFA) collects contact information that is used to guide programmatic decisions and to provide USFA and the public with information about fire departments. Though the form requires the submission of contact information from the individual submitting the form on behalf of an organization, that information is not used to retrieve information, and does not meet the requirements to be considered part of a system of records. Therefore, SORN coverage is not necessary.</b></p> <p><b>PRIV finds that a Privacy Act e(3) Statement is not required in this instance because, as PRIV understands it, no information is being collected that will be stored in a system of records. PRIV requires a privacy notice, which serves a similar purpose to the Privacy Act Statement, and allows individuals to be informed about the collection and use of their information before providing it to DHS.</b></p> <p><b>PRIV agrees with FEMA’s assertion that PIA coverage is provided by DHS/ALL/PIA – 006 Department of Homeland Security General Contact List, which assess the risks associated with the collection of contact lists that are used to facilitate the dissemination of information regarding the Department’s operations and to facilitate the collaboration of partners who are working with the Department on various projects.</b></p>	