



## 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>	N/A		
<b>Form Title:</b>	N/A		
<b>Component:</b>	Transportation Security Administration (TSA)	<b>Office:</b>	<b>Information Technology (IT)</b>

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

<b>Collection Title:</b>	<b>Generic Clearance (GC) for the Collection of Qualitative Feedback on Agency Service Delivery</b>		
<b>OMB Control Number:</b>	1652-0058	<b>OMB Expiration Date:</b>	July 31, 2019
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	N/A

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Christina Walsh		
<b>Office:</b>	IT	<b>Title:</b>	PRA Officer
<b>Phone:</b>	571-227-2062	<b>Email:</b>	Christina.walsh@tsa.dhs.gov

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Glenn Stoll		
<b>Office:</b>	IT	<b>Title:</b>	Records Officer
<b>Phone:</b>	571-227-5175	<b>Email:</b>	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 collection of this information is necessary in order for TSA to garner customer and stakeholder feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy, courtesy, efficiency of service delivery, and resolution of issues with service delivery. TSA will collect, analyze, and interpret this feedback to identify strengths and weaknesses of current services and make improvements in service delivery. This feedback will not include Sensitive PII and will not yield quantitative results that can be used for substantial changes to TSA policy or procedures, in accordance with Executive Order (EO) 12862, as amended.**

**The types of collections that this generic clearance covers include, but are not limited to: Customer comment cards/complaint forms; Small discussion groups; Focus groups of customers, potential customers, delivery partners, or other stakeholders; Cognitive laboratory studies, such as those used to refine questions or assess usability of a website; Qualitative customer satisfaction surveys (e.g., post-transaction surveys or opt-out web surveys); In-person observation testing (e.g., website or software usability tests).**

- 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.*

**[EO 12862](#), as amended, directs federal agencies to provide service to the public that matches or exceeds the best service available in the private sector, and to continuously evaluate their performance in meeting this standard and work to improve it.**

**TSA is responsible for securing all modes of travel pursuant to the Aviation and Transportation Security Act (ATSA), 49 USC § 114, including the screening of aviation passengers and baggage ((49 USC § 114(e)).**



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 checked="" 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. <p style="margin-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="margin-left: 80px;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> Feedback, survey or focus group participant.
d. How do individuals complete the form? Check all that apply.	<input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)

<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"/> Online web form. (available and submitted via the internet) <i>Provide link: TBD</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><b>Sensitive PII will not be collected or retained. Non-sensitive PII (contact information) may be collected by a specific survey to facilitate communication between survey participants and TSA, when necessary. On rare occasions where focus group participants may receive compensation, a separate PTA will be conducted to identify any/all needed PIA/SORN coverage for the collection of financial account information.</b></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 <b>specific authority</b> to collect SSN or these other SPII elements.</p>	
<p>N/A</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>N/A</p>	
<p>i. Are individuals provided notice at the time of collection by DHS (<i>Does the records</i></p>	<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Individuals voluntarily provide feedback by completing survey themselves and submitting directly to TSA.



<i>subject have notice of the collection or is form filled out by third party)?</i>	<input type="checkbox"/> No.
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<b>3. How will DHS store the IC/form responses?</b>	
a. How will DHS store the original, completed IC/forms?	<input checked="" 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. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a>
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. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> <a href="#">Click here to enter text.</a>
d. What is the records retention schedule(s)? <i>Include</i>	5000.21.1-b) Operational: Surveys targeting non-agency employees (e.g., contractors, stakeholders, the public) on such matters as program interests, activity participation, organizational performance, customer

<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.



<i>the records schedule number.</i>	satisfaction, training effectiveness, etc., excluding those that collect [sensitive] personally identifiable information (SPII). Cut off at end of the calendar year in which final report, study, research, or analysis ended. Destroy 7 years after cutoff. N1-560-10-001; Item 2a(2).
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	The program office’s records liaison is responsible for ensuring the regular review of and destruction of eligible records.
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. <a href="#">Click here to enter text.</a>  <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. <a href="#">Click here to enter text.</a>  <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>Jennifer L. Schmidt</b>
Date submitted to component Privacy Office:	<b>July 31, 2018</b>
Date submitted to DHS Privacy Office:	August 3, 2018
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. Records are not retrieved by a personal identifier.
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>TSA Privacy recommends approval of this PTA. To the extent PIA coverage for this General Clearance, Qualitative Feedback on Agency Service Delivery, is required due to the collection of contact information from survey participants, DHS/PIA-006, DHS Contact Lists is applicable as well as the forthcoming DHS Surveys PIA. SORN coverage is not required because records are not retrieved by a personal identifier.</b>	





## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Sean McGuinness</b>
PCTS Workflow Number:	<b>1168341</b>
Date approved by DHS Privacy Office:	<b>August 31, 2018</b>
PTA Expiration Date	<b>August 31, 2021</b>

### 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:	<b>DHS PRIV has approved this ICR/Form.</b>
Date IC/Form Approved by PRIV:	<b>May 11, 2016</b>
IC/Form PCTS Number:	<b>1123780</b>
Privacy Act Statement:	Choose an item. <b>A Privacy Act Statement is not required as records are not retrieved by personal identifier.</b>
PTA:	Choose an item.



	<b>PTA to outline the collection of financial information in rare cases where survey participants receive compensation required.</b>
PIA:	<b>System covered by existing PIA</b> If covered by existing PIA, please list: <b>DHS/ALL/PIA-006 General Contact Lists</b> 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><b>DHS Privacy Office finds that the Generic Clearance (GC) for the Collection of Qualitative Feedback on Agency Service Delivery surveys are privacy sensitive as they collect PII from members of the public to include U.S. citizens, lawful permanent residents and Non-U.S. Persons in certain cases.</b></p> <p><b>TSA uses these surveys to collect information necessary for TSA to garner customer and stakeholder feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Some surveys may collect limited contact information to facilitate communication between survey participants and TSA, when necessary. On rare occasions focus group participants may receive compensation, a separate PTA will be conducted to identify any/all needed PIA/SORN coverage for the collection of financial account information.</b></p> <p><b>PRIV agrees with TSA Privacy that PIA coverage is provided under DHS/ALL/PIA-006 General Contact Lists. DHS/ALL/PIA-006 outlines how DHS collects contact information in order to distribute information and perform various other administrative tasks. The forthcoming Surveys PIA will provide further coverage.</b></p> <p><b>SORN coverage is not required as records are not retrieved by personal identifier. Records could be retrieved by the name of the study or survey, airport code or checkpoint location, by the company that was contracted to conduct the study, etc.</b></p> <p><b>A Privacy Act Statement is not required as records are not retrieved by personal identifier.</b></p>	



**Homeland  
Security**

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Washington, DC 20528  
202-343-1717, [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov)  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)