U.S. Department of the Interior
PRIVACY THRESHOLD ANALYSIS

The DI-4012 Privacy Threshold Analysis (PTA) form helps Department of the Interior (DOI) Privacy Officials determine whether a new or revised Privacy Impact Assessment (PIA) is required in accordance with the E-Government Act, OMB policy, and the DOI PIA Guide, and identify other related compliance requirements for the collection, maintenance, storage, use, processing, sharing or disposal of personally identifiable information (PII) and any activities that may have privacy implications or otherwise impact individual privacy. See the DOI PTA Guide for guidance on completing the PTA. PTAs must be completed and submitted to the appropriate Bureau/Office Associate Privacy Officer for review and compliance determination. Bureau/Office Associate Privacy Officers are responsible for overseeing and managing PTAs for their organizations.

Section 1. General Information

Question	Response
A. Project, Program or System Name: *Provide the name for the project, program or system for the PTA, which may be an IT system, a project title, program area, information collection, or other technology.*	Native Youth Community Adaptation and Leadership Congress (NYCALC)
B. Bureau or Office: *Enter the bureau or office for the project, program or system.*	FWS
C. Program or Office: *Provide the name of the program or office within the bureau/office.*	NCTC
D. Project/Program Manager or System Owner: *Enter the name, title, phone number, and email address of the Program Manager or System Owner.*	Name: Jennifer Hill Title: Congress Coordinator Phone: 304-876-7441 E-mail: Jennifer_Hill@fws.gov
E. Routing Information: *Indicate whether this is a new or updated PTA and enter the date the PTA was completed and submitted to the APO for privacy determination.*	_X__ New PTA ___ Updated PTA Date of Submission: 10/3/2019

Section 2. Project, Program or System Summary

Question	Response
A. General description of the project, program or system. *Please provide a description of the project or program, including any background information to help understand the project, program or system. If this is an updated PTA, please describe the changes that triggered the update to this PTA. Please also indicate if the PTA is being updated as part of its annual review.*	The New Mexico Wildlife Federation (NMWF) holds an annual youth conservation training conference at NCTC via a cooperative agreement with FWS.
B. What is the technology or format used for the Project, Program or System? *Select all types of technology or sources that apply for the PII that will be collected from or maintained on individuals, including methods such as a paper or electronic form or survey, website collection, social media, or interviews over the phone or in person.*	___ IT System ___ New Project or Program ___ Website ___ Web Form, Survey or Information Collection ___ Third-Party Website ___ Social Media Application ___ SharePoint ___ Mobile Application ___ Closed Circuit Television (CCTV) ___ Paper-based Collection _X_ Other: Federal and non-governmental collaborative program
C. Does this project, program or system involve a form, survey or information collection? *If this project, program or system uses a form, survey, or other information collection, select "Yes" and describe the specific method or format used. Include titles and numbers or other identifying information.*	_X_ Yes: NMWF collects applicant data via their website, email and Google forms. ___ No
D. Is Office of Management and Budget (OMB) approval required for the collection? *OMB approval is required for certain collections of information from ten or more members of the public under the Paperwork Reduction Act.*	_X_ Yes: FWS PERMA is working with the program to obtain OMB approval. ___ No

Section 3. Personally Identifiable Information

Question	Response
A. What categories of individuals does the Project, Program or System collect, maintain, store, use, process, disseminate or dispose of PII? Please select all that apply. *Indicate whether the project, program or system collects, contains, uses or disseminates PII information about members of the general public, Federal employees, contractors, or volunteers; or if the system does not contain any information that is identifiable to individuals (e.g., statistical, geographic, financial).*	___ Federal employees ___ Contractors _X_ Members of the public ___ Other: *Describe.* ___ This project, program or system does not collect, maintain or process PII
B. What specific information about individuals will be created, collected, used, processed, maintained or disseminated? *Describe all the types of information about individuals that will be created, collected, used, processed, maintained, or disseminated. Include any new information that may be created, such as an analysis or report. Describe the purpose of that collection or use of information.*	Applicant/attendees who are rising high school seniors aged 16-18: name, DOB, community/Tribal affiliation, address, phone number, mentor's name, school name & address, grade, email address, emergency contact information, parental/guardian consent, medical & health information in the case of an emergency.
C. Is information retrieved by a unique identifier assigned to the individual? *Describe how information is retrieved for the project, program or system.*	___ Yes: *Please describe.* ___ No: Not applicable. Records are maintained, categorized and retrieved by NMWF - not FWS.
D. Is the information covered by a System of Records Notice (SORN)? *The Privacy Act requires that agencies publish a SORN in the Federal Register upon the establishment of a new, or modification of an existing, system of records. For new SORNS being developed, select "Yes" and provide a detailed explanation. For existing systems of records, identify the applicable government-wide, DOI, or bureau SORN(s) that covers the system of records with the SORN identifier and Federal Register citation.*	___ Yes: *Please provide the title, date, and Federal Register citation.* _X_ No: Records are maintained, categorized and retrieved by NMWF and not FWS.

Question	Response
E. Does the Project, Program or System collect or use Social Security Numbers (SSNs)? *List the statutory and regulatory authority and Executive Orders that authorizes the collection or use of SSNs to meet an official program mission or goal.*	___ Yes: *Please provide the legal authority for the collection of SSNs and describe the uses of the SSNs within the Project, Program or System.* _X_ No
F. Does this Project, Program or System receive or share PII with any other internal DOI programs or systems? *Indicate whether PII will be shared with or from internal organizations within DOI.*	___ Yes: *Please describe the PII shared and purpose of the sharing.* _X_ No
G. Does this Project, Program or System receive or share PII with any external (non-DOI) partners or systems? *Indicate whether PII will be shared with agencies or organizations external to DOI. This could be other federal, state and local government agencies, private sector entities, contractors or other external third parties. For Privacy Act systems, identify the applicable SORN and describe how an accounting of the disclosure is maintained.*	_X_ Yes: All applicant and attendee records are maintained, categorized and retrieved by NMWF. ___ No
H. Is this external sharing pursuant to new or existing information sharing agreement (Memorandum of Understanding, Memorandum of Agreement, Letters of Intent, etc.)? *Information sharing agreements are generally documented in Memorandums of Understanding, Memorandums of Agreement, Letters of Intent, or other documents, and outline the purpose, roles of the parties, data ownership, authorized uses, policy, scope, standards, procedures, practices, limitations on re-dissemination, and safeguard requirements for the transfer, maintenance and disposal of PII to ensure all parties understand and adhere to the mutually established terms of the agreement.*	_X_ Yes: Cooperative Agreement. ___ No

Section 4. PTA Review and Recommendation

Question	Response
Privacy Compliance Determination: *This determination is to be completed by the Associate Privacy Officer (APO). See DOI PTA Guide, DOI PIA Guide, related Federal laws and policies, and Departmental guidance on privacy requirements.*	_X_ PTA is sufficient at this time ___ Privacy Impact Assessment (PIA) required ___ Adapted PIA required ___ System of Records Notice (SORN) required ___ Notice of Proposed Rulemaking/Final Rule required ___ Computer Matching Notice required ___ Computer Matching Agreement required ___ Privacy Act Statement required ___ Privacy Notice required ___ Specialized role-based training required ___ Information sharing agreement required ___ Further privacy compliance review is required ___ Refer for Security Compliance Assessment ___ Refer for Information Collection Clearance Review ___ Refer for Records Review _X_ Other: FWS Privacy is working with NCTC Contracting Officer to ensure responsibilities for information security and privacy protections are addressed adequately in the cooperative agreement.
Bureau Associate Privacy Officer Comments: *Provide comments or additional guidance on privacy compliance requirements.*	The NYCALC is not a Government information technology system or system of records. The conference is coordinated and held by NMWF with assistance from FWS NCTC staff and access to FWS facilities. FWS is not responsible for the personal information of NYCALC attendees or applicants collected by the NMWF.
Associate Privacy Officer Name:	Jennifer L. Schmidt
Bureau/Office:	
Date:	

DOI Privacy Office Comments