



PRIVACY THRESHOLD ANALYSIS (PTA)

**This form is used to determine whether
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. 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. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	FEDERAL ASSISTANCE FOR OFFSITE RADIOLOGICAL EMERGENCY PLANNING [OMB # 1660-0024]		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Radiological Emergency Preparedness Program (REP), Professional Services & Integration, Technological Hazards Division (THD), National Preparedness Directorate (NPD)
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	January 1, 2005	Pilot launch date:	Click here to enter a date.
Date of last PTA update	November 1, 2012	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	D.J. Mauldin		
Office:	Radiological Preparedness Branch	Title:	Management Analyst
Phone:	202-212-2127	Email:	deborah.mauldin@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.



Specific PTA Questions

1. Reason for submitting the PTA: Renewal PTA

Pursuant to Executive Order 12657 (53 FR 47513, Nov. 18, 1988) whenever State or local governments, either individually or together, decline or fail to prepare commercial nuclear power plant offsite radiological emergency preparedness plans that are sufficient to satisfy Nuclear Regulatory Commission (NRC) licensing requirements or to participate adequately in the preparation, demonstration, testing, exercise, or use of such plans, a utility owner (“licensee”) which has received a license from the NRC to operate a commercial nuclear power plant may request FEMA assistance.

FEMA regulations at 44 C.F.R. Part 352 establishes the framework for FEMA to provide Federal assistance, or resources, to the NRC licensees. Per 44 C.F.R. 352.2(a):

“This Part applies whenever State or local governments, either individually or together, decline or fail to prepare commercial nuclear power plant offsite radiological emergency preparedness plans that are sufficient to satisfy NRC licensing requirements or to participate adequately in the preparation, demonstration, testing, exercise, or use of such plans. In order to request the assistance provided for in this Part, an affected nuclear power plant applicant or licensee shall certify in writing to FEMA that the above situation exists.”

The licensee must submit their request for resources in a written statement to the host FEMA Regional Office pursuant to 44 C.F.R. § 352.4. The Regional Office will then forward the request to the FEMA Deputy Administrator for the National Preparedness Directorate for an "approve" or "decline" determination. The request becomes part of FEMA's official record, and is stored in a file cabinet within FEMA Headquarters.

FEMA's decision/response to the licensee's request is based on information that includes:

- (1) Whether the licensee has made maximum use of its own resources; and
- (2) The extent to which the licensee has complied with the 44 C.F.R. Part 352 requirements.

It should be noted that no licensee has ever requested the use of FEMA resources since the issuance of Executive Order 12657 or 44 C.F.R. Part 352. Nevertheless, having this Collection approved and in place eliminates the need for urgency should a licensee ever submit a request of this nature.

2. Does this system employ any of the following technologies:

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

- Closed Circuit Television (CCTV)
- Social Media
- Web portal¹ (e.g., SharePoint)
- Contact Lists
- None of these

¹ Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.



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Version number: 01-2014

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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program does not collect any personally identifiable information²</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> DHS employees/contractors (list components):</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p> <p><input type="checkbox"/> Employees of other federal agencies</p>
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<p>4. What specific information about individuals is collected, generated or retained?</p>	
<ul style="list-style-type: none"> Name Position Title Business Phone Number Business Address 	
<p>4(a) Does the project, program, or system retrieve information by personal identifier?</p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p>
<p>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes.</p>
<p>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</p>	<p>Click here to enter text.</p>
<p>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>Click here to enter text.</p>
<p>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.</p>
<p>4(f) If header or payload data³ is stored in the communication traffic log, please detail the data</p>	

² DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that 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. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



elements stored.
Click here to enter text.

<p>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>In accordance with the 44 C.F.R. Part 352, Subpart B, FEMA may call upon any Federal agency to participate in planning for the use of Federal facilities and resources in the licensee offsite emergency response plan. Licensee contact information may be shared with such agencies as needed to assist with the offsite emergency response plan.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>In accordance with the 44 C.F.R. Part 352, Subpart B, FEMA may call upon any Federal agency to participate in planning for the use of Federal facilities and resources in the licensee offsite emergency response plan. Licensee contact information may be shared with such agencies as needed to assist with the offsite emergency response plan.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</p>	<p>Choose an item. Not Applicable.</p> <p>Please describe applicable information sharing governance in place:</p> <p>Since no licensee has ever requested the use of FEMA resources since the issuance of Executive</p>

³ When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

⁴ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.



	Order 12657 or 44 C.F.R. Part 352 there is no information sharing agreements in place.
<p>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>
<p>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?</p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p>

⁴ FIPS 199 is the [Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Tannaz Haddadi
Date submitted to Component Privacy Office:	September 30, 2014
Date submitted to DHS Privacy Office:	October 1, 2014
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
1660-0024 is a privacy sensitive ICR because PII is collected and retained. Since this ICR is an exercise, FEMA Privacy recommends coverage by the DHS/FEMA/PIA-016 - Application and Registration Records for Training and Exercise Programs (ARRTEP) PIA and DHS/FEMA-011 - Training and Exercise Programs SORN.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
PCTS Workflow Number:	1036050
Date approved by DHS Privacy Office:	October 1, 2014
PTA Expiration Date	October 1, 2014

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	Form/Information Collection
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 Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.



<input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.	
PIA:	DHS/FEMA/PIA-016 - Application and Registration Records for Training and Exercise Programs (ARRTEP)
SORN:	DHS/FEMA-011 - Training and Exercise Programs
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
<p>This ICR is privacy sensitive because it collects PII. As described in Executive Order 12657 and 44 C.F.R. Part 352 whenever State or local governments, either individually or together, decline or fail to prepare commercial nuclear power plant offsite radiological emergency preparedness plans that are sufficient to satisfy Nuclear Regulatory Commission (NRC) licensing requirements or to participate adequately in the preparation, demonstration, testing, exercise, or use of such plans, a utility owner (“licensee”) that has received a license from the NRC to operate a commercial nuclear power plant may request FEMA assistance. It should be noted that no licensee has ever requested the use of FEMA resources since the issuance of Executive Order 12657 or 44 C.F.R. Part 352. Nevertheless, having this collection approved and in place eliminates the need for urgency should a licensee ever submit a request of this nature. DHS Privacy agrees with FEMA that this ICR should be covered by the DHS/FEMA/PIA-016 - Application and Registration Records for Training and Exercise Programs (ARRTEP) PIA and DHS/FEMA-011 - Training and Exercise Programs SORN. No further action is required at this time.</p>	