



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:

Form Title:	National Household Survey on Disaster Preparedness		
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Component:	Federal Emergency Management Agency (FEMA)	Office:	Office of Resilience, National Preparedness Directorate, Individual
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IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	National Household Survey on Disaster Preparedness		
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OMB Control Number:	1660-0105	OMB Expiration Date:	January 31, 2021
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Collection status:	Revision	Date of last PTA (if applicable):	June 13, 2017
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PROJECT OR PROGRAM MANAGER

Name:	Joseph Faulk		
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Office:	Individual and Community Preparedness Division	Title:	Preparedness Data Lead
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Phone:	202-716-0478	Email:	joseph.faulk@fema.dhs.gov
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kevin Crosby		
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Office:	Information Management Division	Title:	Government Information Specialist
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Phone: 202-550-6482 Email: Kevin.crosby@fema.dhs.gov

SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

This PTA is being submitted for the renewal of FEMA’s use of its National Household Survey on Disaster Preparedness, previously referred to as the Community Preparedness and Participation Survey (FEMA Form 008-0-15) per the three-year expiration. Since the last PTA, approved by DHS on June 13, 2017, FEMA added a webform to the collection to increase efficiencies and a question bank from which to draw questions for each iteration. There are no additional changes to this collection.

The Individual and Community Preparedness Division (ICPD) works to strengthen the Nation’s resilience by preparing individuals, organizations, and communities for any disaster or emergency. To execute its mission, ICPD conducts research to better understand effective preparedness actions and ways to motivate the public to take those actions. ICPD also develops and shares preparedness resources based upon its research.

ICPD analyzes and uses data collected in FEMA Form 008-0-15, National Household Survey on National Preparedness, to identify progress and gaps in individual and community preparedness and participation and to better understand the motivators and barriers to preparedness in general and about specific hazards (e.g., hurricanes, floods, wildfires). The survey measures the public’s knowledge, attitudes, and behaviors relative to preparing for a range of hazards.

The National Household Survey on Disaster Preparedness does not collect personally identifiable information (PII) from the public. ICPD hires contractors to conduct the surveys online and over the phone using electronic forms.

For phone interview, the contractor will fill in the answers to the survey. For web-based interviews, the respondents will complete the survey on their own. The contractor identifies the pool of respondents based on FEMA’s needs to obtain a viable representation of disaster preparedness throughout the U.S. including tribes and territories that will be used to conduct the anonymous survey. In addition to responses for the subject matter (preparedness), the survey collects data from various demographics. The surveys are specifically designed to be anonymous and NO information is collected which may convert the data to PII (names, SSN, DOB, etc.). FEMA only receives and/or retains the survey responses (consolidated dataset) and any data analysis for the purposes stated above.

The datasets are used for analysis. FEMA will publish the survey results and the dataset on OpenFEMA. The analysis, survey results, and data sets are not deleted.

- a. 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.*



The Stafford Act, Title VI, Emergency Preparedness (42 U.S.C. 5195-5195(a)) identifies the purpose of emergency preparedness “for the protection of life and property in the United States from hazards.” It directs that the Federal Government “provide necessary direction, coordination, and guidance” as authorized for a comprehensive emergency preparedness system for all hazards. Emergency preparedness is defined as all “activities and measures designed or undertaken to prepare or minimize the effects of a hazard upon the civilian population...” The “conduct of research” is among the measures to be undertaken in preparation for hazards.

Presidential Policy Directive-8 (PPD-8) directs the Secretary of Homeland Security to “coordinate a comprehensive campaign to build and sustain national preparedness, including public outreach and community-based and private sector programs to enhance national resilience, the provision of Federal financial assistance, preparedness efforts by the Federal Government, and national research and development efforts.”

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? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons. <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 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. If a business entity, is the only information collected business contact information?

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.



	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject.</p> <p><i>This is a survey given to a representative sample of the U.S. public. It may be given over the phone (data recorded by contractor) or through an online collection tool (data directly submitted by respondents), both methods using the same methodology and questions.</i></p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. Contractor uses Computer Assisted Telephone Interviewing (CATI) for telephone surveys. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link: It is proprietary software and may vary during the life of the PRA depending on the contractor collecting the data (subcontractors may change). As such, no link is provided.</i></p>
<p>e. What information will DHS collect on the form?</p>	
<p>It will be a combination of phone survey responses or via an online web form that respondents will access and complete. The questions will vary each time the survey is administered based on recent disasters or disasters deemed most likely to occur in particular areas. All questions will be taken from the question bank that is provided with this PTA, and each administration of the survey will be designed to take no longer than 11 minutes on average. In addition to responses for the subject matter (preparedness), the survey collects data from various demographics. The surveys are specifically designed to be anonymous and NO information is collected which may convert the data to PII (names, SSN, DOB, etc.). FEMA only receives and/or retains the survey responses (consolidated dataset) and any data analysis for the purposes stated above.</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. None apply.</i>	
<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 <i>specific authority</i> to collect SSN or these other SPII elements.	
No information is collected containing any SSN or other SPII elements.	
h. How will this information be used? What is the purpose of the collection? Describe <i>why</i> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.	
No SPII is collected or used	
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>)?	<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Each administration of the survey starts with a note to the respondent that the third party will be collecting information in behalf of FEMA and that no privacy information will be collected. The note also includes a burden statement that the time estimated to complete the survey. Telephone interviews will have a read statement and the online surveys will include a printed notice. <input type="checkbox"/> No.



3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<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.</p> <p>The data from all the forms is output directly into a dataset (Excel) which is stored on FEMA network drives. (Shared drive or Cloud computing storage supported by FEMA IT)</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p>
b. If electronic, how does DHS input the responses into the IT system?	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. If surveys are done via telephone calls, the data will be manually entered into proprietary software. The data from the forms will be output as an Excel dataset and stored in FEMA IT storage systems.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. If surveys are responded to via online forms, data will be automatically collected and output as an Excel dataset and be stored in FEMA IT storage systems.</p>
c. How would a user search the information submitted on the forms, i.e., how is the	<p><input type="checkbox"/> By a unique identifier.² Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. Please describe.</p>

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.



information retrieved?	All searches would be done by types of disasters or demographic information like county, state, or zip code of respondents.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	ICPD records are destroyed immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use per EDP 2-2 from the FEMA Retention Schedule.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	ICPD staff uses the collected data for studies and development of trend analysis. Records are continuously used and monitored. When they are no longer deemed useful for analysis the records will be destroyed.
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. Click here to enter text.	
<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.	
<p>Final summary information and datasets will be published on OpenFEMA for external use.</p>	
<input 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:	Hasan Mansori
Date submitted to component Privacy Office:	February 8, 2021
Date submitted to DHS Privacy Office:	March 3, 2021
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. Click here to enter text.
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>	
FEMA Privacy continues to recommend this collection as non-privacy sensitive. However, FEMA recommends a separate PTA to discuss the dataset that will be shared on OpenFEMA.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Joseph Thomas (Riley Dean)
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	March 11, 2021
PTA Expiration Date	March 11, 2024

DESIGNATION

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:	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:	Choose an item. Click here to enter text.
PTA:	Choose an item. Click here to enter text.
PIA:	Choose an item. If covered by existing PIA, please list: Click here to enter text.



	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>FEMA has submitted this PTA to discuss the renewal of FEMA’s use of the National Household Survey on Disaster Preparedness. The anonymous survey is conducted via online form or telephone, and a contractor uses its existing phone directory system to create a pool of phone numbers that will be used to conduct the survey.</p> <p>FEMA does not receive the phone numbers used in the survey, but does receive the survey responses, which are then used to identify progress and gaps in individual and community preparedness and participation and to better understand the motivators and barriers to preparedness in general and about specific hazards.</p> <p>The survey collects demographic and contextual information on disaster preparedness from members of the public including age, gender, income level, and geography. No PII is collected, and the information that is collected is not enough to determine an individual’s identity. The DHS Privacy Office concurs with FEMA that the survey is a non-privacy sensitive system.</p> <p>Therefore, this PTA is sufficient and no PIA is necessary. SORN coverage is also not required, as no PII is collected and no information is retrieved by unique identifier.</p>	