



S. Department of the Interior VACY 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: <i>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.</i>	Program Announcement G19AS00004
B. Bureau or Office: <i>Enter the bureau or office for the project, program or system.</i>	U.S. Geological Survey
C. Program or Office: <i>Provide the name of the program or office within the bureau/office.</i>	Cooperative Research Units (CRU)
D. Project/Program Manager or System Owner: <i>Enter the name, title, phone number, and email address of the Program Manager or System Owner.</i>	Name: John Thompson Title: Deputy Chief, CRU Phone: 703-648-4262 E-mail: jthompson@usgs.gov
E. Routing Information: <i>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.</i>	☒ New PTA ☐ Updated PTA Date of Submission: October 29, 2018

Section 2. Project, Program or System Summary

Question	Response
A. General description of the project, program or system. <i>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.</i>	The Cooperative Research Units (CRU) Program is a unique collaborative relationship between States, Universities, the Federal government and a non-profit organization. The program is comprised of 40 Cooperative Fish and Wildlife Research Units on university campuses in 38 states. Created in 1935, the program was formally sanctioned in 1960 with the enactment of the Cooperative Units Act (PL 86-686). The act specifies the participants in the program as well as its mission. Each unit is established through a formal cooperative agreement. All signatory parties to an individual Unit cooperative agreement have joint ownership of the Unit and its direction. They all also contribute substantially to the partnership and by design, receive leveraged benefits from participating, allowing each to achieve more as part of a collective than would be achievable individually. The units in the program are jointly supported by the US Geological Survey, Host Universities, State Natural Resource Agencies, and in most cases, the Wildlife Management Institute, and the US Fish and Wildlife Service. Cooperative Research Units were established with a trifold mission, a mission that is codified in the program's authorizing legislation and that has remained unchanged through time: • Education - Provide advance training in fish, wildlife, and natural resource sciences, assuring a continuing supply of quality natural resource professionals for state and federal agencies. • Research – Provide federal and state agencies access to the expertise, and facilities at leading universities around the country, to address the natural resource information needs expressed by Unit cooperators and partners. • Technical Assistance - Provide technical assistance in the understanding and use of science and research findings, to State and Federal personnel and other natural resource managers. This tri-fold mission is consistent with the Secretary of the Interior priorities of 1) Create a conservation stewardship legacy second only to Teddy Roosevelt, and

2) Strike a regulatory balance. This mission also facilitates the linkage of the research and information needs of federal, state and other natural resource managers and professionals with the expertise and facilities of leading research universities, and graduate student training. Federal Unit scientists, affiliated university faculty, and advanced students work in a variety of fields of cutting edge science to address issues of importance to the science and management of fish, wildlife and natural resources. Sponsoring agencies are provided assistance in the interpretation and application of the research findings as well as a talent pool of trained biologists graduating from the program.

For a more detailed look at the CRU Program visit:
<http://www.coopunits.org>

Statutory Authority of Program

Cooperative Research Units Act (16 U.S.C. 753a-753b), Public Law 86-686, Sec. 1, Sept. 2, 1960, 74 Stat. 733, as amended by the Fish and Wildlife Improvement Act of 1978, Public Law 95-616, Sec. 2, Nov. 8, 1978, 92 Stat. 3110.

Research Work Orders

Research Work Orders (RWO) are the mechanism by which Federal financial assistance is provided to a Unit. All proposed RWOs must be coordinated with the Recipient's Cooperative Research Unit prior to submission and will be required to be submitted electronically through grants.gov.

Timetables

The announcement shall open each year for new RWOs (Research Work Orders) and modifications to be submitted from October 1 through the due date stipulated by the USGS.

Eligibility – Who May Submit a Proposal

Only CRU Cooperating Universities are eligible to apply to the RWO component of the Cooperative Research Unit Program pursuant to the Cooperative Research Unit Act (Public Law 86-686).

B. What is the technology or format used for the Project, Program or System? <i>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.</i>	☐ 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 ☒ Other: <i>Describe. https://www.grants.gov</i>
C. Does this project, program or system involve a form, survey or information collection? <i>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.</i>	☒ Yes: <i>Please describe.</i> 1) Project proposal budgets in Word or Excel format. Shows breakdown of RWO costs and include names, salary & fringe benefits (USGS Contracting requirement). 2) We have the option to conduct a Public Survey/Poll but this is extremely rare and requires OMB clearance. ☐ No
D. Is Office of Management and Budget (OMB) approval required for the collection? <i>OMB approval is required for certain collections of information from ten or more members of the public under the Paperwork Reduction Act.</i>	☐ Yes: <i>Please provide the status of any information collection clearance request related to this project, program or system, and include all OMB Control Numbers and Expiration Dates that are applicable.</i> ☒ 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. <i>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).</i>	☐ Federal employees ☐ Contractors ☐ Members of the public ☐ Other: <i>Describe.</i> ☒ This project, program or system does not collect, maintain or process PII NOTE: USGS Contracting requires our project proposal budgets contain breakdown of costs which include salary & fringe benefits. Federal employee names are listed. Sometimes names of grad students, post docs & student techs are listed. CRU does not keep these records for use or disseminate PII.
B. What specific information about individuals will be created, collected, used, processed, maintained or disseminated? <i>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.</i>	1) Budgets in Word or Excel format. Shows breakdown of RWO costs and include names, salary & fringe benefits (USGS Contracting requirement). 2) We have the option to conduct a Public Survey/Poll but this is extremely rare and requires OMB clearance.
C. Is information retrieved by a unique identifier assigned to the individual? <i>Describe how information is retrieved for the project, program or system.</i>	☐ Yes: <i>Please describe.</i> NAME ☒ X No .
D. Is the information covered by a System of Records Notice (SORN)? <i>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</i>	☐ Yes: <i>Please provide the title, date, and Federal Register citation.</i> Skip per James Piyavansuthi ☐ No

Question	Response
<i>covers the system of records with the SORN identifier and Federal Register citation.</i>	
E. Does the Project, Program or System collect or use Social Security Numbers (SSNs)? <i>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.</i>	☐ Yes: Please provide the legal authority for the collection of SSNs and describe the uses of the SSNs within the Project, Program or System. ☒ No
Does this Project, Program or System receive or share PII with any other internal DOI programs or systems? <i>Indicate whether PII will be shared with or from internal organizations within DOI.</i>	☐ Yes: Please describe the PII shared and purpose of the sharing. ☒ No
G. Does this Project, Program or System receive or share PII with any external (non-DOI) partners or systems? <i>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.</i>	☐ Yes: Please describe the PII shared and purpose of the sharing. ☒ No
H. Is this external sharing pursuant to new or existing information sharing agreement (Memorandum of Understanding, Memorandum of Agreement, Letters of Intent, etc.)? <i>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.</i>	☐ Yes: Please describe applicable information sharing agreement(s) in place. ☒ No

Section 4. PTA Review and Recommendation

Question	Response
Privacy Compliance Determination: <i>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.</i>	☐ 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 ☐ Other: <i>Describe.</i>
Bureau Associate Privacy Officer Comments: <i>Provide comments or additional guidance on privacy compliance requirements.</i>	
Associate Privacy Officer Name:	
Bureau/Office:	
Date:	

DOI Privacy Office Comments

