



## 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
<b>A. Project, Program or System Name:</b> <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>	Federal Subsistence Management System
<b>B. Bureau or Office:</b> <i>Enter the bureau or office for the project, program or system.</i>	Office of the Secretary
<b>C. Program or Office:</b> <i>Provide the name of the program or office within the bureau/office.</i>	Office of Subsistence Management
<b>D. Project/Program Manager or System Owner:</b> <i>Enter the name, title, phone number, and email address of the Program Manager or System Owner.</i>	Name: Derek Hildreth  Title: Program Analyst/Subsistence Data Coordinator  Phone: 907-786-3877  E-mail: dhildreth@ios.doi.gov
<b>E. Routing Information:</b> <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>	<input type="checkbox"/> New PTA  <input checked="" type="checkbox"/> Updated PTA  Date of Submission: October 25, 2024

## Section 2. Project, Program or System Summary

Question	Response
<p><b>A. General description of the project, program or system. Please provide the utility of the program; how</b></p> <p><i>Please describe 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></p>	<p>The Federal Subsistence Management Program is a multi-agency effort to provide the opportunity for a subsistence way of life by rural Alaskans on Federal public lands and waters while maintaining healthy populations of fish and wildlife. Subsistence fishing and hunting provide a large share of the food consumed in rural Alaska. The information is used to monitor some of the subsistence harvests of moose, caribou, deer, bear, sheep, goat, and fish by rural Alaskans; to collect biological information; and to monitor activities of take, trade, and transport of parts.</p> <p>The Federal Subsistence Board (Board) is an entity jointly established by the Secretaries of the Interior and Agriculture to administer the subsistence taking and uses of fish and wildlife on public lands in Alaska. The OSM provides substantial administrative support to the Board pursuant to its governing regulations at 50 C.F.R. part 100 (Interior) and 36 C.F.R. part 242 (Agriculture). Testimony at Federal Subsistence Board (Board) meetings and public comment meetings is recorded electronically, transcribed, stored for use in regulatory proposals, and publicly available.</p> <p>With the enactment of the Department of the Interior's (Department) 2024 appropriations, Congress approved a transfer of OSM to the Office of the Secretary. Consistent with this guidance and in recognition of the elevation of Tribal sovereignty and additional efficiencies to be gained, the Department has determined to move OSM from FWS to the Office of AS-PMB. This proposal also responded to the concerns and input of Alaska Native communities and people-many of whom rely on subsistence use-and to the need to enhance program operations for all federally qualified subsistence users particularly in the face of a changing climate.</p> <p>This transfer is issued under the authority of title VII of the Alaska National Interest Lands Conservation Act, 16 U.S.C. §§ 3111-3126; regulations at 36 C.F.R. part 242 and 50 C.F.R. part 100; and sections 2 and 5 of Reorganization Plan No. 3 of 1950 (64 Stat 1262), as amended.</p>

	<p>The records are used by biologists in the Bureau of Land Management, National Park Service, Office of Subsistence Management, the U.S. Fish and Wildlife Service, and the U.S. Forest Service.</p> <p>The program is currently undergoing modernization to make the forms and applications available electronically as well as on paper.</p>
<p><b>B. What technology or format is used for the Project, Program, or System?</b> <i>Select all types of technology or sources that apply to 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></p>	<p><input checked="" type="checkbox"/> IT System  <input type="checkbox"/> New Project or Program  <input checked="" type="checkbox"/> Website  <input checked="" type="checkbox"/> Web Form, Survey or Information Collection  <input type="checkbox"/> Third-Party Website  <input type="checkbox"/> Social Media Application  <input type="checkbox"/> SharePoint  <input type="checkbox"/> Mobile Application  <input type="checkbox"/> Closed Circuit Television (CCTV)  <input checked="" type="checkbox"/> Paper-based Collection  <input checked="" type="checkbox"/> Other: Online Permit Applications.</p>
<p><b>C. Does this project, program or system involve a form, survey, or information collection?</b> <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></p>	<p><input checked="" type="checkbox"/> Yes: <i>Please describe.</i></p> <p>The application form (NOMB Control No. 1018-0075 Expires 06/30/2026) for a harvest permit is completed by agency staff or volunteer permit issuers (tribal and community leaders) who assist with the issuing of permits either electronically or manually. In addition, a harvesting individual is required to return a completed harvest report to the issuing field office by mail, email, telephone, fax, or hand-delivery.</p> <p><input type="checkbox"/> No</p>
<p><b>D. Is Office of Management and Budget (OMB) approval required for the collection?</b> <i>OMB approval is required for certain collections of information from ten or more members of the public under the Paperwork Reduction Act.</i></p>	<p><input checked="" type="checkbox"/> 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 applicable Expiration Dates.</i></p> <p>OMB Control No. 1018-0075 Expires 06/30/2026. The FWS forms are currently being modified into DI Forms.</p> <p><input type="checkbox"/> No</p>

### Section 3. Personally Identifiable Information

Question	Response
<p><b>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.</b>  <i>Indicate whether the project, program, or system collects, contains, uses, or disseminates PII information about members of the 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></p>	<p><input checked="" type="checkbox"/> Federal employees  <input checked="" type="checkbox"/> Contractors  <input checked="" type="checkbox"/> Members of the public  <input checked="" type="checkbox"/> Other: <i>Describe:</i> Volunteers.  <input type="checkbox"/> This project, program, or system does not collect, maintain, or process PII.</p>
<p><b>B. What specific information about individuals will be created, collected, used, processed, maintained or disseminated? What is your authority to collect this information; e.g., Endangered Species Act, Migratory Bird Treaty Act, etc.</b>  <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></p>	<p>From permit applicants/holders and harvesters</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Birth Date</li> <li>• Resident Community</li> <li>• Personal Email Address</li> <li>• Home/Work/Cell Telephone Number</li> <li>• Mailing Address</li> <li>• Residence Physical Location.</li> <li>• Proof Of State Residence</li> <li>• Proof Of Physical Location of Residence</li> <li>• Permit Number</li> <li>• The amount of harvest</li> <li>• The species of harvest</li> <li>• The date of harvest</li> <li>• The location of the harvest</li> <li>• Number of days attempting to harvest.</li> <li>• The mode of transportation to the harvest</li> <li>• The actions taken for delinquent harvest report information.</li> <li>• Notes on reminder letters or notices</li> <li>• Restriction of harvest start and end dates.</li> <li>• Notes related to the collection or resolution of the harvest.</li> </ul> <p>From board applicants and nominees (made up of Federal government employees and members of the public):</p> <p>Applicant/nominee full name, home, work, fax numbers, birthdate, mailing and email address; References' full name, home, work, fax numbers, email address,</p>

Question	Response
	<p>organization, organization address, and general information about serving on board.</p> <p>Authority: ANILCA (Alaska National Interest Lands Conservation Act, Title 50 Chapter I Subchapter H Part 100).</p> <p>Harvest statistics are conjoined, with PII redacted from the records, to perform analysis and report development and shared with the Board to assist them with regulatory decision-making.</p>
<p><b>C. Is information retrieved by a unique identifier assigned to the individual?</b> <i>Describe how information is retrieved for the project, program, or system.</i></p>	<p><input checked="" type="checkbox"/> Yes: <i>Please describe.</i></p> <p>Identifiers:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number.</li> <li>• Email</li> <li>• Subsistence Permit Number.</li> <li>• State Hunting/Trapping License number.</li> </ul> <p>Retrieval method</p> <ul style="list-style-type: none"> <li>• Electronically (Database).</li> <li>• From Paper Records.</li> </ul> <p><input type="checkbox"/> No</p>
<p><b>D. Is the information covered by a System of Records Notice (SORN)?</b> <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 covers the system of records with the SORN identifier and Federal Register citation.</i></p>	<p><input type="checkbox"/> Yes: <i>Please provide the title, date, and Federal Register citation.</i></p> <p><input checked="" type="checkbox"/> No:</p>
<p><b>E. Does the Project, Program, or System collect or use Social Security Numbers (SSNs)?</b> <i>List the statutory and regulatory authority and Executive Orders that authorize the collection or use of SSNs to meet an official program mission or goal.</i></p>	<p><input type="checkbox"/> Yes: <i>Please provide the legal authority for the collection of SSNs and describe the uses of the SSNs within the Project, Program, or System.</i></p> <p><input checked="" type="checkbox"/> No</p>
<p><b>F. Does this Project, Program, or System receive or share PII with any other internal DOI programs or systems? i.e., do you share</b></p>	<p><input checked="" type="checkbox"/> Yes:</p>

Question	Response
<p><b>PII with other Bureaus, and if so who, how, and what for?</b> <i>Indicate whether PII will be shared with or from internal organizations within DOI.</i></p>	<p>In addition to OSM, data is collected by three other Department of Interior branches. This data is compiled and housed in agency servers in Denver Colorado and is available to these agencies electronically through this system:</p> <ul style="list-style-type: none"> <li>• Bureau of Land Management</li> <li>• National Park Service</li> <li>• US Fish and Wildlife Service</li> </ul> <p>___ No</p>
<p><b>G. Does this Project, Program or System receive or share PII with any external (non-DOI) partners or systems? i.e., Tribal, state, or local gov, public or private partners, NGOs, grantees, other Federal agencies, etc. and if so, who, how and what for?</b> <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></p>	<p><input checked="" type="checkbox"/> Yes: <i>Please describe the PII shared and the purpose of the sharing.</i></p> <p>PII is composed of name, address, phone, permit number, state licenses, harvest identification, and statistics.</p> <p>The system receives or shares PII with a branch of the Department of Agriculture:</p> <p>U.S. Forest Service.</p> <p>Volunteer permit issuers (tribal and community leaders) have access to the permitting PII because they assist with the issuing of permits, filling out applications, and distributing permits and harvest report postcards.</p> <p>___ No</p>
<p><b>H. Is this external sharing under new or existing information-sharing agreements (Memorandum of Understanding, Memorandum of Agreement, Letters of Intent, etc.)?</b> <i>Information-sharing agreements are generally documented in Memorandums of Understanding, Memorandums of Agreement, Letters of Intent, or other documents, and outline them to ensure all parties understand and adhere to the mutually established terms of the agreement.</i></p>	<p>___ Yes: <i>Please describe applicable information sharing agreement(s) in place.</i></p> <p><input checked="" type="checkbox"/> No</p>

## Section 4. PTA Review and Recommendation

Question	Response
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<b>Privacy Compliance Determination:</b> <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>	<input type="checkbox"/> PTA is sufficient currently. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> Adapted PIA required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Notice of Proposed Rulemaking/Final Rule required. <input type="checkbox"/> Computer Matching Notice required. <input type="checkbox"/> Computer Matching Agreement required. <input checked="" type="checkbox"/> Privacy Act Statement required. <input type="checkbox"/> Privacy Notice required. <input type="checkbox"/> Specialized role-based training required. <input checked="" type="checkbox"/> Information sharing agreement required. <input type="checkbox"/> Further privacy compliance review is required. <input type="checkbox"/> Refer for Security Compliance Assessment. <input type="checkbox"/> Refer for Information Collection Clearance Review. <input type="checkbox"/> Refer for Records Review. <input checked="" type="checkbox"/> Other: <i>Describe.</i> 508 Compliance required.
<b>Bureau Associate Privacy Officer Comments:</b> <i>Provide comments or additional guidance on privacy compliance requirements.</i>	IT System needs a PIA because it collects and maintains PII from members of the public. SORN also needed because records about individuals are retrieved by a unique personal identifier assigned to the individual. FWS SORN Permits-21 is not sufficient as system owner and Privacy Act system manager is OS/PMB. Privacy Act statements referencing the correct SORN are needed on the DI Forms. Information sharing agreement needed, because PII is shared with external non-DOI entity.
<b>Associate Privacy Officer Name:</b>	
<b>Bureau/Office:</b>	OACIO
<b>Date:</b>	October 29, 2024

<b>DOI Privacy Office Comments</b>	