



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: <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>	Paleontological Resources Protection – an inter-bureau project between FWS, BOR, BLM, and NPS.
B. Bureau or Office: <i>Enter the bureau or office for the project, program or system.</i>	National Park Service
C. Program or Office: <i>Provide the name of the program or office within the bureau/office.</i>	Natural Resource Stewardship and Science Directorate (NRSS)
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: Vincent L. Santucci Title: Senior Paleontologist / Paleontology Program Coordinator Phone: 202-513-7186 E-mail: Vincent_Stantucci@nps.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: 3/3/2022

Section 2. Project, Program or System Summary

Question	Response
A. General description of the project, program or system. Please provide the utility of the program; how <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>	This program will protect and preserve paleontological resources as required in the Paleontological Resources Preservation Act of 2009 (and its implementing regulations). The program will consist of general policy and guidance for preserving these resources on NPS lands and a permitting system for collection of the materials by qualified researchers for reviewed research projects.
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 (National Park Service Research Permit and Reporting System) ☐ New Project or Program ☒ Website https://irma.nps.gov/RPRS/Home ☐ 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.</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> An application form and a permit form. ☐ 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> OMB has reviewed and approved the information collection requirements associated with the NPS' application and reports for paleontological permits (OMB Control Number 1024-0236; Current Expiration Date: 09/30/2023) ☐ 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 – PII for Government Users (NPS employees and other NPS badged contractors and volunteers) is required for authentication, account management and logging purposes. NPS users use their government issued Personal Identity Verification (PIV) card authenticated through the Enterprise Active Directory (AD).” ☒ Contractors ☒ Members of the public ☐ Other: <i>Describe.</i> ☐ 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? <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>	This system contains paleontological resources use permit applications; documents associated with the bureau or office decision on a permit; documents associated with the management of the permits, including records of appeals of bureau or office decisions; and other records necessary to manage the permitting process and permit-related bureau or office administrative records. The system also contains information on permit numbers, locations of the paleontological site, locality numbers, types, and purposes of the proposed activity, reports of results of permitted activities, and locations and transfers of collections made under a permit. These records may contain the following information: Names of applicants and support personnel such as other persons who conduct or oversee work under the permit; researchers; applicant institutional affiliation; applicant contact information including work mailing address, work telephone number(s), work fax number, and/or professional email address; field contact information; applicant and support personnel resumes, educational institutions attended and dates of attendance or graduation, applicant institutional affiliation, employment information, machinery or vehicle identifying information as appropriate; proof of insurance as appropriate, and other information necessary to ensure that the applicant can perform the work proposed under the permit. The system may also contain records related to the assessment of civil penalties including written notices of objection to a proposed assessment of civil penalty, written requests for a hearing on a final assessment of civil penalty, final determinations, and any correspondence or

Question	Response
	record related to the implementation of provisions related to civil penalties under the PRPA.
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>	<u> X </u> Yes: <i>Please describe.</i> Records are retrieved by the individual's name (permittees or researchers), permit number. <u> </u> 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 covers the system of records with the SORN identifier and Federal Register citation.</i>	<u> X </u> Yes: <i>Please provide the title, date, and Federal Register citation.</i> INTERIOR/DOI-20, Paleontological Resources Preservation System - 84 FR 52530 (October 2, 2019) <u> </u> No
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>	<u> </u> 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> <u> X </u> No
F. 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>	<u> X </u> Yes: <i>Please describe the PII shared and purpose of the sharing.</i> May be shared with other Bureaus as part of joint research. <u> </u> No

Question	Response
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? <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>	<u>X</u> Yes: <i>Please describe the PII shared and purpose of the sharing.</i> “In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, all or a portion of the records or information maintained in this system may be disclosed to authorized entities outside DOI for purposes determined to be relevant and necessary as a routine use pursuant to 5 U.S.C. 52a(b)(3) as indicated in the INTERIOR/DOI-20, Paleontological Resources Preservation System - 84 FR 52530 (October 2, 2019) SORN. The System Owners/Managers maintain an accounting of disclosures of information made to third parties. The System Owners/Managers use the DI-3710 Disclosure Accounting form and ensure the accounting of disclosures is maintained for the life of the record in accordance with the records retention policy.” <u> </u> 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>	<u> </u> Yes: <i>Please describe applicable information sharing agreement(s) in place.</i> <u>X</u> 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>	<u>X</u> PTA is sufficient at this time <u> </u> Privacy Impact Assessment (PIA) required <u> </u> Adapted PIA required <u> </u> 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>	RPRS is a single data system which is served through a central internet website and hosted within the NPS Integrated Resource Management Application (IRMA), which provides resource information to parks, partners, and the public. IRMA has a PIA that includes RPRS as a subsystem in it. The PIA was completed on January 20, 2021. https://www.doi.gov/privacy/pia#NPS
Associate Privacy Officer Name:	FELIX URIBE
Bureau/Office:	NATIONAL PARK SERVICE
Date:	3/4/2022

DOI Privacy Office Comments
N/A.