



Privacy Impact Assessment
for the

National Dialogue for the Quadrennial Homeland Security Review

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Abstract

The National Dialogue on the Quadrennial Homeland Security Review is a conversation between the Department of Homeland Security and Homeland Security stakeholders on an innovative web-based platform. The National Dialogue is an interactive process, building on the public's input over the course of three dialogues. The Department conducted this privacy impact assessment because the participant feedback will be collected with limited personally identifiable information.

Overview

Background

The *Implementing Recommendations of the 9/11 Commission Act of 2007* mandated the Quadrennial Homeland Security Review (QHSR) and included the following consultation requirement:

“The Secretary shall conduct each quadrennial homeland security review under this subsection in consultation with--(A) the heads of other Federal agencies, including the Attorney General, the Secretary of State, the Secretary of Defense, the Secretary of Health and Human Services, the Secretary of the Treasury, the Secretary of Agriculture, and the Director of National Intelligence; (B) key officials of the Department; and (C) other relevant governmental and nongovernmental entities, including State, local, and tribal government officials, members of Congress, private sector representatives, academics, and other policy experts.”

The homeland security community is so vast that physically convening representative and inclusive study groups able to work efficiently and effectively presents a major challenge. To address this challenge and the QHSR consultation requirement, the DHS will make use of a collaborative web-based engagement tool (herein the “National Dialogue portal”) to create a true national dialogue on homeland security. The feedback will help inform of the nation's homeland security goals and objectives, and the tools in which the Department will seek to achieve them, over the next four years. DHS will hold three dialogues involving discussions on six topics under review by DHS. The topics include:

1. Counterterrorism and domestic security management,
2. Securing our borders,
3. Smart and tough enforcement of immigration laws,
4. Preparing for, responding to, and recovering from disasters,
5. Homeland Security national risk assessment, and
6. Homeland Security planning and capabilities.

DHS partnered with the National Academy of Public Administration (NAPA) to host a series homeland security dialogues. Established in 1967 and chartered by Congress, NAPA is a non-profit, non-partisan coalition of top public management and organizational leaders who tackle the nation's most critical and complex challenges. To provide analysis of the feedback gained through these dialogues, NAPA assembled a panel of Fellows. This panel brings subject matter expertise to bear on topics directly relevant to federal homeland security policy, and will provide DHS with a neutral, independent interpretation of the



feedback received. For additional information on the NAPA Fellows, please visit <http://www.napawash.org>.

Establishment of the National Dialogue Portal

NAPA established the National Dialogue portal to seek comments from state, local, and tribal governments, the private sector, non-governmental organizations, and the American people, as key elements of the national homeland security enterprise. The QHSR study groups post their work product to the Portal and solicit feedback from users. When participating in the dialogues, the user is actually taking part in the study groups. Comments will feed directly into the study groups' deliberations as they frame options for homeland security decision-makers. The study groups will not provide responses to all of the comments made as part of the National Dialogue.

The three national homeland security dialogues (August 3 to August 9, August 31 to September 6, and September 28 to October 4) are designed to engage our stakeholders early and often throughout the process. The study groups and the dialogue participants will work throughout the summer to develop and refine the study content. The findings that derive from this interactive process will be presented to DHS Leadership, Federal interagency leaders, and state and local government leaders for their consideration. The Secretary of Homeland Security will provide her conclusions to Congress in a final report by December 31, 2009.

During each of the dialogues, participants will be asked to rate, tag, discuss, and prioritize feedback relating to the materials proposed by the QHSR study groups. Below is an explanation of these features and how they help DHS understand user feedback:

- **Rating**—Users rate individual pieces of feedback, called “ideas,” that generally consist of a title, a description of the feedback, and a description of why the author thinks that feedback is important. The site provides a five-star scale, similar to that used by other popular sites, with five stars indicating the highest rating, and one star indicating the lowest. The use of this functionality means that, over the course of the week-long Dialogue, the QHSR study groups will be able to assess which ideas are the most popular or resonant with dialogue participants. This, in turn, helps to identify novel ideas, important best practices, and relative priorities.
- **Tagging**—Users may apply topic tags to their own submissions and the submissions of others. Tags are usually one- or two-word phrases describing the contents of an idea; for example, an idea about the need for more focus on communications between first responders might be assigned the tags “first responders,” “emergency response,” and “communications.” Users are encouraged to tag their own submissions as well as the submissions of others. Topic tags are useful for two reasons. For Dialogue participants, they make it easy to find interesting and relevant content; clicking on any topic tag will provide a list of other ideas that have had that same tag applied. For the QHSR study groups, topic tags make it possible to discern what broad themes and topics are being raised most frequently during the Dialogue.
- **Submitting an Idea**—Dialogue participants are also able to add their own submissions to the discussion by clicking the “Submit an Idea” button. Participants can submit an idea by adding a long-form explanation (up to 10,000 characters). These ideas can then be rated and tagged by others.

Prior to the first scheduled National Dialogue, NAPA will collect the e-mail addresses of participants and will use the information to send participants news and announcements about the National Dialogue.



NAPA will not provide the e-mail addresses of participants to DHS. After the August 3, 2009 launch date, NAPA will require that participants register with the site. Participants will be required to provide name, zip code, and the type of organization that the individual is affiliated with (i.e., law enforcement). This information is collected in order to provide DHS with aggregate information related to what types of individuals and groups are participating in the National Dialogue. Participant feedback will be collected with an associated username to facilitate transparency. All comments and feedback submitted to the National Dialogue portal during the three dialogues will be publicly available. NAPA will provide analytics (i.e., idea submitted and affiliation) to DHS which will assist DHS with refining questions and developing new questions to present to participants.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

Prior to the first scheduled National Dialogue on Homeland Security on August 3, 2009, NAPA will collect the e-mail addresses of interested participants for the purpose of sending news and announcements about the National Dialogue. NAPA will not provide the email addresses of participants to DHS.

After the August 3, 2009 launch date, NAPA will require that participants register with the National Dialogue portal. Participants will be required to provide name, zip code, and the type of organization that the individual is affiliated with (i.e., law enforcement). This information is collected by NAPA in order to provide DHS with aggregate information related to what types of individuals and groups are participating in the National Dialogue. NAPA will also provide analytics (i.e. idea submitted and affiliation) to DHS which will assist DHS with refining questions and developing new questions to present to participants.

The National Dialogue portal itself will maintain comments voluntarily posted by participants along with their associated user names. Among other things, the association of a user name with a comment allows DHS and NAPA to determine if comments are unique (e.g. prevents multiple submissions of the same comment by the same user).

1.2 What are the sources of the information in the system?

NAPA collects PII directly from the individual. Individual participants are the source of comments.

1.3 Why is the information being collected, used, disseminated, or maintained?

The limited PII collected by NAPA on behalf of DHS from individuals is used for the purpose of contacting the individual and facilitates registration of individuals to the National Dialogue portal. Registration information (name, zip code, and affiliation) are required to facilitate transparency and



accountability and enables NAPA to provide aggregate information to DHS regarding the source of feedback received through the Portal. To facilitate transparency, DHS and the public can view comments and associated user names. This portal enables partners from across the nation to weigh in on QHSR study group proposals relating to homeland security mission goals, objectives, and key strategic outcomes, as well as proposed enhancements to key processes. Participants can also suggest their own alternatives to these proposals, refine them in open discussion, and rate the best ones. The feedback received through these dialogues will directly inform the work of the QHSR study groups, and will help shape the nation's approach to homeland security.

1.4 How is the information collected?

NAPA collects limited contact information via the Internet directly from individuals who wish to provide feedback to DHS on its Quadrennial Homeland Security Review. Registered users then post relevant feedback to the portal.

1.5 How will the information be checked for accuracy?

NAPA collects limited PII directly from individuals for purposes of registering them to the National Dialogue portal and is assumed to be accurate. Information posted by the individual (ratings, tags, feedback), is for informational purposes and will be considered by DHS in its review of the six topics. No assumptions with regard to the accuracy of this information are made. However, the National Dialogue Portal has an official Moderation Policy in place to ensure that comments are appropriate and not harmful to others (see Appendix A).

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

DHS is authorized to collect this information to facilitate the consultation with various homeland security partners in its Quadrennial Homeland Security Review required under 5 U.S.C. § 301, 44 U.S.C. § 3101, and Implementing Recommendations of 9/11 Commission Act of 2007, Public Law No. 110-53, § 2401 (2007).

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Regarding personally identifiable information, there is a risk that the National Dialogue portal will collect more personally identifiable information than is necessary to accomplish the purpose of the portal. To mitigate this risk, in designing the program, NAPA and DHS decided to collect as little PII as necessary. Specifically, NAPA collects email address for the purposes of contacting the individual, and a very limited set of PII (on behalf of DHS) that is relevant and necessary for the purposes of facilitating registration to the Portal. The collection of this information also facilitates accountability to the individual and allows NAPA to provide analysis on feedback received through the portal. To facilitate transparency, DHS and the public will be able to view specific feedback, and an associated user name. Among other things, the association of a user name with a comment allows DHS and NAPA to determine if comments are unique (e.g. prevents multiple submissions of the same comment by the same user). However, beyond this information, NAPA



does not provide DHS with e-mail addresses or information on individual participants, only aggregate information related to what types of individuals and groups are participating in the National Dialogue.

There is also a risk that registered users of the National Dialogue portal will post inappropriate, irrelevant, or duplicative content. To mitigate these risks, the National Dialogue Portal has an official Moderation Policy in place which outlines the circumstances by which comments may be deleted. This policy is enforced by NAPA staff and is available to National Dialogue portal participants. The Moderation Policy ensures that comments are appropriate and not harmful to others.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

NAPA uses individual's limited contact information to contact individuals and facilitate registration to the National Dialogue portal. Once registered, participants may provide feedback to DHS during the three individual dialogues in the form of "rating," "tagging," and "submitting an idea." DHS uses this information to facilitate consultation with homeland security partners and interested individuals regarding the six study areas for the QHSR.

2.2 What types of tools are used to analyze data and what type of data may be produced?

The National Dialogue portal does not use any specialized tools such as data mining to analyze data on the portal. Rather, NAPA provides aggregate information related to what types of individuals and groups are participating in the National Dialogue. NAPA will also provide analytics (i.e., idea submitted and affiliation) to DHS which will assist DHS with refining questions and developing new questions to present to participants. The NAPA Fellows also analyze feedback obtained through the Portal for consideration in the QHSR study areas.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

The National Dialogue portal does not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

NAPA collects personally identifiable information on behalf of DHS to facilitate registration to the National Dialogue portal and only provides aggregate information to DHS concerning ideas submitted and affiliations. DHS will only have access to the user names associated with an individual's post.



Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 What information is retained?

All information is retained for the span of the review. Specifically, the site is collecting and storing: Registration information; Rating responses (1-5 stars, identifiable by user); Idea contents; Tags (aggregated and anonymous); IP addresses (used for stats, not keyed against any other information); Analytics info which is aggregated and anonymous.

3.2 How long is information retained?

All registration information is a temporary record of NAPA, to be retained until December 31, 2009, the date the QHSR is due for submission to Congress. The feedback with associated user names given to DHS will be retained until the next QHSR.

3.3 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

The records are considered temporary records. DHS is in the process of developing its records schedule for the feedback obtained through the National Dialogue, permitting DHS to retain the information until the next QHSR.

3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Data retained for longer than is necessary increases risks for unauthorized use and disclosure. To mitigate this risk, NAPA will only retain the PII until December 31, 2009. With regard to the feedback and associated user names given to DHS, this information will be retained until the next QHSR in the event of congressional inquiries. The information retained by DHS will be covered by the proposed NARA retention schedule, which appropriately balances DHS' need for the information against risks of unauthorized use or disclosure.



Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

The Department does not receive personally identifiable information from NAPA. Accordingly, personally identifiable information is not available for sharing. Only the content and analysis of the feedback will be reported Department-wide.

4.2 How is the information transmitted or disclosed?

As noted above, no personally identifiable information will be shared.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

The Department does not receive personally identifiable information from NAPA. Accordingly, personally identifiable information is not available for sharing. Only the content and analysis of the feedback will be reported Department-wide.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

The Department does not receive personally identifiable information from NAPA. Accordingly, personally identifiable information is not available for external sharing. However, user names and associated comments are available for public viewing.



5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

As noted above, personally identifiable information is not available for external sharing. User names and associated comments are available for public viewing and users are made aware of this upon creating their account.

NAPA is collecting personally identifiable information on behalf of DHS. Accordingly, the collection of this information is covered by the DHS/All-016 Correspondence Records System of Records notice. The notice can be found at <http://edocket.access.gpo.gov/2008/E8-26691.htm>. Generally, NAPA will not disclose your personally identifiable information to any third-parties, including DHS. However, information may be provided to federal, state, or local law enforcement agencies if the information appears to be a violation of law.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

As noted above, personally identifiable information is not available for external sharing. User names and associated comments are available for public viewing and users are made aware of this upon creating their account. However, information may be provided to federal, state, or local law enforcement agencies if the information appears to be a violation of law (e.g. if a user posts a threat or illegal content on the Portal).

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

With any information collection, there is a risk of inappropriate sharing. In the case of the National Dialogue portal, the risk is largely mitigated by the fact that DHS is not receiving PII from NAPA. Rather, NAPA collects the information directly from participants to facilitate registration to the National Dialogue portal. DHS has the ability to view only user names and associated comments.

There is a risk stemming from the nature of the National Dialogue portal as a public website hosted by NAPA. In particular, the risk that inappropriate content may be viewed by the public. To mitigate this risk, the National Dialogue has a Moderation Policy (see Appendix A) enforced by NAPA staff to ensure that comments are appropriate and not harmful to others.



Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Notice was provided to the individual through various forms including the Paperwork Reduction Act notice in the *Federal Register* (74 FR 31286 and 74 FR 26409), the Privacy Act Statement provided on the National Dialogue portal at the time of registration, the DHS/All-016 Correspondence Records System of Records notice, and this PIA.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Providing registration information is strictly voluntary, but if individuals fail to provide this information, they will not be able to participate in the National Dialogue portal.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Once individuals register for the National Dialogue portal and submit their comments, they cannot consent to particular uses of these comments. However, these comments will only be associated with a user name, selected by the individual. The associated PII is not made available to DHS.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

There is a risk that individuals are not made aware of the purpose for the collection of the information. This risk is mitigated by providing various forms of notice including through the *Federal Register* notices, the Privacy Act Statement provided at the time of registration, and this PIA. Thus, individuals have several opportunities to learn about the use of their information.



Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

Users will be able to access their account profile and are able to change or update their registration information.

7.2 What are the procedures for correcting inaccurate or erroneous information?

Users may log-in to the National Dialogue portal to change or update their registration information.

7.3 How are individuals notified of the procedures for correcting their information?

Instructions for updating registration information will be contained on the National Dialogue portal.

7.4 If no formal redress is provided, what alternatives are available to the individual?

Individuals are able to access and correct their registration information.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Risks associated with inaccurate information are fully mitigated by the user's ability to access and update their registration information.



Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

Anyone may register for an account on the National Dialogue portal, however, only certain NAPA staff have access to the registration information. National Dialogue portal was designed to enable users to post and rate submissions along with the associated user names, but not the underlying registration information. This protects the personally identifiable information of users from other users of the Portal.

8.2 Will Department contractors have access to the system?

Yes, DHS partnered with NAPA to administer the portal.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

All federal workers have the required Privacy Awareness Training.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

NAPA uses a process similar to ISO 27001, as typically used on large scale public institution and governmental consultations in the UK.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

NAPA has implemented technical safeguards that ensure only appropriate staff have access to PII. The technical safeguards also ensure that public does not have access to PII, only the user name associated with postings.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

To mitigate risks against unauthorized access to PII, NAPA implemented controls on who may access PII, and minimized its collection of PII. These controls ensure that the users of the National Dialogue portal do not have the ability to see PII of anyone else. The Department of Homeland Security does not



receive any personally identifiable information from NAPA. The public can only view postings and associated user names.

Responsible Officials

Elizabeth Olmo, Director
Office of Strategic Plans
Office of Policy
Department of Homeland Security

Approval Signature

Original signed and on file with the DHS Privacy Office

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security



Appendix A: Moderation Policy

This online dialogue allows you the opportunity to post comments that will remain publicly viewable on this website. The site therefore operates a moderation policy to ensure that comments are appropriate and not harmful to others. Moderation is performed by staff of the National Academy of Public Administration in accordance with the terms set out below.

Comments which include any of the following may be deleted:

- Threats or incitements to violence
- Use of obscenity
- Duplicative or substantially duplicative postings by the same person or entity
- Postings seeking employment or containing advertisements for a commercial product or service
- Information posted in violation of law, including libel, condoning or encouraging illegal activity, revealing classified information, or infringing on a copyright or trademark

While we invite open participation and diverse viewpoints to be shared, the main goal of this dialogue is to inform the Department of Homeland Security's development of homeland security policy through the Quadrennial Homeland Security Review. Accordingly, moderators reserve the right to remove posts which do not address some aspect of that purpose. We deeply value your time and input, and our desire is to remove as few posts as possible while ensuring that a focused, constructive discussion takes place. This moderation policy is subject to change to address additional matters as may be warranted.

If you have a complaint about an item of user-generated content on this site, or feel that your own content was removed in error, please contact us