



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
703-235-0780, pia@dhs.gov  
www.dhs.gov/privacy

**Privacy Threshold Analysis**

**Version date: June 10, 2010**

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**PRIVACY THRESHOLD ANALYSIS (PTA)**

**This form is used to determine whether  
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt from the component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, [www.dhs.gov/privacy](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

**Date Submitted for Review:** October 8, 2010

**Name of Project:** OMB Collection 1660-0015, Application Forms and Instructions for (C)LOMAs and (C)LOMR-Fs to National Flood Insurance Program Maps

**System Name in TAFISMA:**

**Name of Component:** Federal Emergency Management Agency

**Name of Project Manager:** Ms. Ava Hammond

**Email for Project Manager:** Ava.Hammond@dhs.gov

**Phone Number for Project Manager:** (202) 646-3276

**Type of Project:**

Information Technology and/or System.\*

A Notice of Proposed Rule Making or a Final Rule.

Form or other Information Collection.

Other: <Please describe the type of project including paper based Privacy Act system of records.>

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\* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•“Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•“Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note: for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



## SPECIFIC QUESTIONS

**1. Describe the project and its purpose:**

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. The NFIP regulations Section 44 CFR 65 and 70 outline the data that must be submitted by an owner or lessee of property who believes his/her property has been incorrectly included in a Special Flood Hazard Area (SFHA). In order to remove an area from a SFHA, the owner or lessee of the property must submit scientific or technical data demonstrating that the area is "reasonably safe from flooding" and not in the SFHA.

FEMA Form MT-1 "Application Forms for Conditional Letters of Map Amendment (CLOMAs), Final Letters of Map Amendment (LOMAs), Letters of Map Revision Based on Fill (LOMR-Fs), and Conditional Letters of Map Revision Based on Fill (CLOMR-Fs)" supplements the general information requirements in the NFIP regulations and establishes an organized, systematic approach to collect data needed to request removal from a SFHA.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: December 31, 2007

Previous forms collection expired in September of 2007; therefore new forms had to be submitted to OMB for approval. New forms were approved in December of 2007.

**3. From whom do you collect, process, or retain information on: (Please check all that apply)**

DHS Employees.

Contractors working on behalf of DHS.

The Public.

The System does not contain any such information.

**4. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)**

No.

Yes. Why does the program collect SSNs? Provide the function of the SSN and the



legal authority to do so:

<Please provide the function of the SSN and the legal authority to do so.>

**5. What information about individuals could be collected, generated or retained?**

Since the applicants are applying for a letter/determination from DHS-FEMA, they are required to provide their name, address and telephone number (if available) so that all correspondence can be sent to them. Some requests require a fee, therefore applicants may submit payment by check or credit card. Applicants are also required to sign the MT-1 form.

**6. If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?**

No. Please continue to the next question.

Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

Yes. What type of data is recorded in the log? (Please choose all that apply.)

Header.

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

**7. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems<sup>1</sup>?**

No.

Yes.

Please list:

**8. Is there a Certification & Accreditation record within OCIO's FISMA tracking system?**

Unknown.

No.

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<sup>1</sup> PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in TAFISMA.



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Yes. Please indicate the determinations for each of the following:

Confidentiality:     Low    Moderate    High    Undefined

Integrity:          Low    Moderate    High    Undefined

Availability:       Low    Moderate    High    Undefined



## PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: October 21, 2010

Name of the DHS Privacy Office Reviewer: Rebecca J. Richards

### DESIGNATION

This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System

#### Category of System

- IT System.
- National Security System.
- Legacy System.
- HR System.
- Rule.
- Other:

#### Determination

- PTA sufficient at this time.
- Privacy compliance documentation determination in progress.
- PIA is not required at this time.
- PIA is required.
  - System covered by existing PIA: Mapping Information Platform (MIP)
  - New PIA is required.
  - PIA update is required.
- SORN not required at this time.
- SORN is required.
  - System covered by existing SORN: DHS/FEMA/NFIP/LOMA-1
  - New SORN is required.



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**DHS PRIVACY OFFICE COMMENTS** The MIP PIA is in the process of being revised to incorporate changes to NFIP flood maps. The FEMA LOMA SORN is being revised to include all types of flood map changes and renamed to reflect coverage of all flood map changes.