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 (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, on DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: December 7, 2010

Name of Project: MT eGrants

System Name in TAFISMA: eGrants (DDM/FMA)

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Jennifer East

Email for Project Manager: Jennifer.East@fema.gov

Phone Number for Project Manager: 202-646-2908

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:

MT eGrants is composed of an internal (government-facing) system and an external facing system. The external system is used by grant applicants and sub-applicants (States, Federally-recognized Indian Tribal governments, territories, and local governments) to create grant applications, and the internal systems is used by FEMA staff to review those applications and award and monitor grants. MT eGrants is used to process applications for the following components of the Hazard Mitigation Assistance (HMA) grant programs: Pre-Disaster Mitigation (PDM), Flood Mitigation Assistance (FMA), Repetitive Flood Claims (RFC) and Severe Repetitive Loss (SRL).

2. Status of Project:

☐ This is a new development effort.

☒ This is an existing project.

Date first developed: August 2003

Date last updated: Sept 30, 2010 - EXT version 5.09 / Oct 7, 2010 – INT version 5.08

Description: General system enhancements and bug fixes to internal and external functional areas of the eGrants system.

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?

The eGrants system is an online grant application and grant management system.

The personally identifiable information that may be included in an application includes an individual's name, home phone number, office phone number, cell phone number, damaged property address, mailing address of the individual property owner(s), the individual's status of flood insurance, National Flood Insurance Program Policy Number, and the Insurance Policy Provider for the property proposed to be mitigated with FEMA funds.

Additionally, with each application information is provided by the State for point of contact purposes that includes name of the point of contact for the application, work address, work phone number, and work email address. This information is manually verified to determine State's and local community's eligibility for funding under FEMA Mitigation grant programs.

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[1]?**

☐ No.

☒ Yes.

Please list: **FEMA's Enterprise Data Warehouse (EDW)**

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

[1] 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.

☐ Unknown.

☐ No.

☒ 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

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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: December 16, 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:
  - ☒ New PIA is required.
  - ☐ PIA update is required.
- ☐ SORN not required at this time.
- ☒ SORN is required.
  - ☐ System covered by existing SORN:
  - ☒ New SORN is required.

DHS PRIVACY OFFICE COMMENTS eGRANTS will be covered by the forthcoming Hazard Mitigation Assistance Grants Program PIA and associated SORN.