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: 12/29/2010

Name of Project: Exemption of State-Owned Properties Under Self-Insurance

System Name in TAFISMA: n/a

Name of Component: FEMA

Name of Project Manager: Mary Ann Chang

Email for Project Manager: mary.chang@dhs.go

Phone Number for Project Manager: (202) 212-4712

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.>**

SPECIFIC QUESTIONS

[†] 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.

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

The Flood Disaster Protection Act of 1973, Section 102 (c) enables the Federal Insurance Administrator to grant a State having an adequate plan of self-insurance for its State-owned buildings an exemption from the insurance purchase requirements of the 1973 Act. 44 CFR Part 75 establishes standards with respect to the Administrator's determinations that a State's plan of self-insurance is adequate and satisfactory for the purposes of the Act, from the requirement of purchasing flood insurance coverage, for State-owned structures and their contents in areas identified by the Administrator as A, AO, AH, A1-A30, AE, A99, M, V, VO, V1-V30, VE, and E zones, in which the sale of insurance has been made available, and to establish the procedures by which a State may request exemption.

Application for exemption is made to the Federal Insurance Administrator by the Governor or other duly authorized official of the State accompanied by sufficient supporting documentation, which certifies that the plan of self-insurance upon which the application for exemption is based meets or exceed the standards set forth in 44 CFR sections 75.11.

2.   **Status of Project:**

☐ This is a new development effort.

☒ This is an existing project.

   Date first developed:

   Date last updated:

   <Please provide a general description of the update.>

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

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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?**

No information about individuals is collected. The type of information—submitted by the State in conjunction with it request to be approved as a self-insurer for flood—would include evidence of a formal policy or plan of self-insurance created by statute or regulation, details of this plan, an inventory with estimated replacement costs of all State-owned property located in Special Flood Hazard Areas (SFHAs), and flood loss experience for State-owned structures.

Currently we have no information in file from the States. The only files that were maintained were paper-based files. These files were lost when being transferred to a new office location. There were no recent submissions. The latest submissions in the (lost) files are estimated to be 25 or more years old.

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.

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[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.

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Please list:

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

    ☐ 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

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office:

Name of the DHS Privacy Office Reviewer: <Please enter name of reviewer.>

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.

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☐ 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