



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



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: May 9, 2012

Name of Project: Application for Community Disaster Loan Program (1660-0083)

System Name in TAFISMA: <Please enter the name.>

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Victor Kurz

Email for Project Manager: victor.kurz@fema.dhs.gov

Phone Number for Project Manager: (202) 646-7947

Type of Project:

- Information Technology and/or System.*
- A Notice of Proposed Rule Making or a Final Rule.
- Form or other Information Collection.
- Other:

* 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 Office of Response and Recovery, Public Assistance Division's Community Disaster Loan (CDL) Program provides operational funding to help local governments that have incurred a significant loss in revenue, due to a major disaster, that has or will adversely affect their ability to provide essential municipal services. This PTA will extend the use of the Loan Package utilized to implement the Community Disaster Loan Program (1660-0083).

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: 1/1/1974

Date last updated: 6/30/2009

Extended the use of the Loan Package.

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 following information is collected on local government's primary and alternate contacts:



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- The individuals name; title; local government mailing address, email address, telephone numbers and fax numbers.

Financial information to include:

- The financial account holder(s) name;
- The local community's name; address; telephone number; the Financial Institution's name; address; telephone number; Direct Deposit Account Number; Bank Routing Number; Claim or Payroll ID Number;
- The name and telephone number of the Financial Institution's Certifying Representative.

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 systems¹?**

No.

Yes.

Please list:

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

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: May 10, 2012

Name of the DHS Privacy Office Reviewer: Brian E. Anderson

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: Information Collection1660-0083

Determination

- PTA sufficient at this time.
- Privacy compliance documentation determination in progress.
- PIA is not required at this time.
- PIA is required.



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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: DHS/FEMA 004 Grant Management Information Files SORN

New SORN is required.

DHS PRIVACY OFFICE COMMENTS THE COMMUNITY DISASTER LOAN PROGRAM IS A PUBLIC ASSISTANCE PROGRAM AND AS SUCH THE DATA COLLECTED IS SIMILAR TO THAT COLLECTED FOR FEMA'S GRANT PROGRAMS.

THE DHS/FEMA 004 SORN, WHICH COVERS PUBLIC ASSISTANCE GRANTS WILL BE UPDATED TO EXPLICITLY INCLUDE THIS TYPE OF LOAN RECORDS.

THE GRANT MANAGEMENT PROGRAMS PIA WILL ALSO BE UPDATED TO REFLECT THE INCLUSION OF THESE TYPES OF RECORDS.