



## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**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, 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 DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.  
Upon receipt, the DHS Privacy Office will review this form  
and may request additional information.

### SUMMARY INFORMATION

**DATE submitted for review: February 6, 2012**

**NAME of Project: Post Construction Elevation Certificate and Floodproofing Certificate**

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

**Name of Project Manager: Mary Ann Chang**

**Email for Project Manager: mary.chang@dhs.gov**

**Phone number for Project Manger: (703) 605-0421**

**TYPE of Project:**

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

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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
- "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 National Flood Insurance Program (NFIP) has developed the Elevation Certificate and Floodproofing Certificate. The two certificates are used in conjunction with the flood insurance application in order to properly rate Post-FIRM structures in Special Flood Hazard Areas (44 CFR 61.7, 61.8) for flood insurance. Post-FIRM structures are those buildings constructed after publication of the Flood Insurance Rate Map (FIRM) for the community. Flood insurance may be purchased either directly from FEMA (NFIP Direct) through a licensed insurance agent/broker or from a private sector insurance company participating the FEMA Write-Your-Own Program. Upon completion of the Elevation Certificate by a licensed surveyor or the completion of the Floodproofing Certificate by an architect or engineer, the certificates are provided to the NFIP Direct Servicing Agent (NFIP Direct) by the property owner's insurance agent (or insurance broker) along with an application for flood insurance. The certificates are maintained by the NFIP Direct. These form may also be used by insurance companies (such as Nationwide) that participate in the Write-Your-Own Program; however, the insurance company collects and maintains the forms for their records and they are not sent to or collected by FEMA. FEMA collection of the Elevation Certificate and Floodproofing Certificate through it's NFIP Direct process is strictly paper based and is part of information collection OMB No. 1660-0008.

### 2. Status of Project:

This is a new development effort.

This an existing project.

Date first developed: January 1, 1981

Date last updated: April 1, 2009

Changes made were to clarify the instructions for completeing the form and to ask for the required information in a clearer manner.

### 3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?

Yes.

No. Please describe the information source and collection method.

<Please describe the information source and collection method.>



**4. Does the individual have the option to decline submitting the information collected?**

Yes.

No.

**5. Is the information collected limited to non-sensitive personally identifiable information? *An example of sensitive personally identifiable information is the social security number or date of birth.***

Yes.

No.

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

Property Owner or Owner's Representative:

Name

Property Address

Signature

Telephone Number

Surveyor, Engineer, or Architect:

Name

License Number (Surveyor, Engineer, or Architect certification)

Title

Affiliate Organization

Organization Address

Signature

Telephone Number

Community Official (Mayor or County Executive):

Name

Title

Signature

Telephone Number



7. **Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

8. **With whom could the information be shared?**

The NFIP Direct Serving Agent (contracted by FEMA to issue NFIP policies) does not share this information with outside sources.

Property owners may choose to submit the certificates to local or tribal government offices for purposes not related to obtaining flood insurance. However, any information transferred by the property owner is not collected by FEMA. Likewise, property owners may choose to submit the certificates along with an application for flood insurance when obtaining flood insurance from a private sector insurance company participating in the NFIP Write-Your-Own Program. FEMA does not collect or maintain these certificates; they are maintained in the private companies' files.

9. **Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

10. **Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**

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: February 15, 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 Collection

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
- System covered by existing PIA: DHS/ALL-PIA 006 General Contact Lists
  - A new PIA is required.
  - A PIA Update is required.
- A SORN is required
- System covered by existing SORN: DHS/FEMA-003 - National Flood Insurance Program Files and DHS/FEMA/NFIP/LOMA-1 - National Flood Insurance Program (NFIP) Letter of Map Amendment (LOMA) DHS/ALL-002 Mailing and Other Lists
  - A new SORN is required.



**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<sup>th</sup>, 2009**

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#### **DHS PRIVACY OFFICE COMMENTS**

DHS/FEMA-003 and DHS/FEMA/NFIP/LOMA-1 SORNS provide explicit coverage of these individuals. The use of PII is consistent with DHS/ALL-PIA 006 General Contact Lists.