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.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: December 16, 2011

Name of Project: National Flood Insurance Program Call Center and Agent Referral

System Name in TAFISMA:

Name of Component: Federal Emergency Management Agency; Federal Insurance and Mitigation Administration

Name of Project Manager: Carolyn Goss

Email for Project Manager: carolyn.goss@dhs.gov

Phone Number for Project Manager: 202-212-4728

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.>**

[ ] 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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SPECIFIC QUESTIONS

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

   The Flood Disaster Protection Act of 1973, Congress Findings and Declaration of Purpose, Section 2(a)(6) finds that it is in the public interest for persons already living in flood prone areas to have an opportunity to purchase flood insurance and access to more adequate limits of coverage in order to be indemnified for their losses in the event of future flood disasters. Accordingly, FEMA executes FloodSmart, a multimedia direct response television (DRTV), direct mail, online advertising, print and public relations/outreach) marketing and advertising campaign designed to generate consumer interest in flood insurance.

   As part of this effort, FEMA operates the Call Center, which operates in conjunction with the FloodSmart Web site (www.FloodSmart.gov). The combination of these alternative methods of marketing outreach provide the mechanism for current and potential policyholders to learn more about floods and flood insurance, contact an agent, or assess their risk.

2. **Status of Project:**

   ☒ This is a new development effort.

   ☐ This is an existing project.

   > Date first developed: April 1, 2005

   > 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.

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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?**

Consumer Information:

Callers are asked specific questions as stated in the telephone scripts that clearly demonstrate that the information provided will be used to serve the caller's own request for information, agent referral, or in the case of insurance agents, enrollment in the referral service. Information obtained includes the callers' name, address, and telephone number.

Names and telephone numbers collected through the Call Center or FloodSmart Web site will be used exclusively for providing information on flood insurance and/or facilitate its purchasing through the agent referral service

Individual names or phone numbers are not utilized for tracking purposes. External sources such as Call Center or FloodSmart Web data are matched back and tracked at the address only level. The NFIP's goal is to insure as many properties as possible. For this reason, the management focuses on address information. The data is strictly for internal use, shared by managers and contractors directly involved in marketing activities of the NFIP to monitor sales increase and retention of flood insurance policies.

Agent Information:

Agents who choose to be a part of the National Flood Insurance Program are required to fill out FEMA form 81-95, which requests specific information regarding their insurance practice and contact information. Although the form is web-based, agents can complete it via a customer service representative at the call center. This

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information is retained for disseminating to interested consumers who would like to talk to an agent about purchasing a flood insurance policy as part of the agent referral program. This information is retained in a secured database, used exclusively by NFIP staff and contractors involved in the marketing effort.

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:

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

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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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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.

  ☒ 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: DHS/FEMA-007 National Flood Insurance Program Marketing Files

    ☐ New SORN is required.

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DHS PRIVACY OFFICE COMMENTS