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 9, 2011

Name of Project: Assistance to Firefighter Grants Program

System Name in TAFISMA: AFG-Assisted Firefighters Grant

Name of Component: Federal Emergency Managment Agency

Name of Project Manager: Catherine Patterson

Email for Project Manager: catherine.patterson@dhs.gov

Phone Number for Project Manager: 202.786.9796

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.

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SPECIFIC QUESTIONS

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

   The Assistance to Firefighters Grant Program project is a competitive grant opportunity that is administered by the Assistance to Firefighters Program Office. The grant application package is included in the Office of Management and Budget Information Collection Request 1660-0054. The purpose of the application is to assess the needs of each individual applicant compared to the other applicants interested in the opportunity. The authority for Assistance to Firefighters Grant Program (AFG) is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 et seq.), as amended. This submission is necessary in order for DHS to effectively implement a competitive grant program and meet the fiscal deadlines. The data generated through the grant application process is stored and maintained in the AFG-Assisted Firefighter Grant IT system, which was de-coupled from the National Emergency Management Information System (NEMIS). This system does not relate to any other grant application system such as Non-Disaster (ND) Grants.   Applicants are state, county, and municipal organizations/entities in charge of administering fire fighting duties.

2. **Status of Project:**

   ☐ This is a new development effort.

   ☒ This is an existing project.

   > Date first developed: March 02, 2002

   > Date last updated: July 15, 2011

   > Application undergoes minor edits/adjustments each year. For example, in 2010, we asked each applicant the following questions: Are all of your active firefighters trained to NFPA 1001 or equivalent? If not, will you be asking for training funds for this purpose with this application or will you obtain the appropriated training through other resources? In 2010, these questions will be changed to: What percent of your active firefighters are trained to the level of Firefighter II? If you answered less than 100% to either question above, are you requesting training funds to bring 100% of your firefighters into compliance with NFPA 1001, Firefighter I and NFPA 1001, Firefighter II?

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.

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☐ 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 only information collected and retained is the name, title, phone numbers, and email
    address for the applying organizations Points of Contact (POC).

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: December 9, 2011

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: Grant Program

Determination

   ☐ PTA sufficient at this time.

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☐ Privacy compliance documentation determination in progress.

☐ PIA is not required at this time.

☒ PIA is required.

    ☒ System covered by existing PIA: Grants Management Programs 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

    ☐ New SORN is required.

DHS PRIVACY OFFICE COMMENTS: THIS PTA WAS COMPLETED AS PART OF THE LEGACY NEMIS PROJECT. THE PTA DOCUMENTS BOTH THE IT SYSTEM THAT WAS DE-COUPLED FROM NEMIS (AFG-ASSISTED FIREFIGHTER GRANT), AS WELL AS THE AFG PROGRAM AND ITS ASSOCIATED INFORMATION COLLECTION REQUEST (1660-0054), WHICH IS WHY THE 'IT SYSTEM AND 'OTHER' DESIGNATIONS ARE BOTH CHECKED ABOVE.