



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
Senior 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 your 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

Project or Program Name:	Public Benefit Conveyance		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	SSFMD
TAFISMA Name:	n/a	TAFISMA Number:	n/a
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational

PROJECT OR PROGRAM MANAGER

Name:	Adrian Austin		
Office:	Real Property	Title:	Building Management Specialist
Phone:	202-212-2099	Email:	Adrian.austin@dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:	n/a		
Phone:	n/a	Email:	n/a

ROUTING INFORMATION

Date submitted to Component Privacy Office:	February 6, 2013
Date submitted to DHS Privacy Office:	May 31, 2013
Date approved by DHS Privacy Office:	June 17, 2013



SPECIFIC PTA QUESTIONS

1. Please describe the purpose of the project or program:

Please provide a general description of the project and its purpose in a way a non-technical person could understand.

FEMA Form 119-0-1 is used to collect information from members of the public to process applications for Public Benefit Conveyance (PBC) and Base Realignment and Closure (BRAC) programs whereby state, local, or tribal governments may acquire Federal surplus property for emergency management purposes at no cost. This activity is authorized by 40 U.S.C. §§ 541 and 553, and 41 C.F.R. parts 102-75.750 through 102-75.815.

2. Project or Program status

Existing

Date first developed: August 1, 2010

Pilot launch date: [Click here to enter a date.](#)

Date last updated: August 1, 2010

Pilot end date: [Click here to enter a date.](#)

3. From whom does the Project or Program collect, maintain, use or disseminate information?

Please check all that apply.

- DHS Employees
- Contractors working on behalf of DHS
- Members of the public
- This program does not collect any personally identifiable information¹

4. What specific information about individuals could be collected, generated or retained?

Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.

- Applicant's name;
- Job title;
- Address;
- Email address; and
- Phone number.

¹ DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	n/a
If yes, please describe the uses of the SSNs within the Project or Program:	n/a

<p>5. Does this system employ any of the following technologies:</p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Sharepoint-as-a-Service <input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal ² <input checked="" type="checkbox"/> None of the above
<p>If this project is a technology/system, does it relate solely to infrastructure?</p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
<p>If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
n/a	

<p>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<input checked="" type="checkbox"/> No.
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² Informational and collaboration-based portals in operation at DHS and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or who seek to gain access to the portal “potential members.”

³ When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.



	<input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Please describe applicable information sharing governance in place. n/a

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LaKia Samuel
Date submitted to DHS Privacy Office:	May 31, 2013
Component Privacy Office Recommendation:	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Not a privacy sensitive collection. Recommend previous adjudication of no PIA or SORN coverage needed. FEMA only tracks the type of inventory given out, and does not collect any PII from the public.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Dayo Simms
Date approved by DHS Privacy Office:	June 13, 2013
PCTS Workflow Number:	982893

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Other

⁴ 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.



	If "other" is selected, please describe: Form/ Information Collection
Determination:	<input type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/ALL/PIA-006 Department of Homeland Security General Contact Lists
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/ALL-002 - Department of Homeland Security (DHS) Mailing and Other Lists System November 25, 2008, 73 FR 71659
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
PRIV disagrees with the FEMA Privacy recommendation that the PBC collection is not privacy sensitive. This collection of PII from members of the public requires a PIA and SORN. PRIV will adjudicate this PTA under the Contacts List PIA and Mailing List SORN. However, this may be more appropriately covered in the Grants Management Programs PIA and SORN or another PIA and SORN, more closely linked to the program. PRIV requests that FEMA evaluate the PBC and determine whether there is an Existing PIA or SORN that would provide more specific coverage for this program.	