The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
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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
Senior Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

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: 202-343-1717.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Urban Area Security Initiative (UASI) Non Profit Security Grant Program (NSGP)		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Protection and National Preparedness (PNP)
TAFISMA Name:	Click here to enter text.	**TAFISMA Number:**	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	**Project or program status:**	Operational

PROJECT OR PROGRAM MANAGER

Name:	**Angel McLaurine-Qualls**		
Office:	**Grant Programs Directorate (GPD)**	**Title:**	Program Specialist
Phone:	**202-279-0596**	**Email:**	Angel.Mclaurine-Qualls@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	**Email:**	Click here to enter text.

ROUTING INFORMATION

Date submitted to Component Privacy Office:	April 24, 2013
Date submitted to DHS Privacy Office:	August 2, 2013
Date approved by DHS Privacy Office:	August 13, 2013

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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.*
The Grant Programs Directorate (GPD) manages the Urban Areas Security Initiative (UASI) Non Profit Security Grant Program (NSGP). The UASI NSGP provides funding support for target hardening and other physical security enhancements and activities to nonprofit organizations that are at high risk of terrorist attack and located within one of the specific UASI-eligible Urban Areas. While this funding is provided specifically to high-risk nonprofit organizations under The Consolidated Appropriations Act, 2012, Division D (Pub. L. No. 112-74), the program seeks to integrate nonprofit preparedness activities with broader State and local preparedness efforts. It is also designed to promote coordination and collaboration in emergency preparedness activities among public and private community representatives, as well as State and local government agencies, and Citizen Corps Councils. Information related to the UASI NSGP is collected pursuant to Section 2003 of the Homeland Security Act of 2002, 6 U.S.C. § 604, as amended by Section 101, Title I of the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. No. 110-053) and is part of OMB ICR No. 1660-0110. Information related to the UASI NSGP is collected from the members of the public, specifically, nonprofit organizations requesting federal funds and State agencies supporting the applicant's request. All applicants must submit their application to each State within which any part of the high-risk urban area is located for review before submission to FEMA.   During the application process, grant applicant's and state points-of-contact (POC) and or representatives provide their name, title, address, phone number(s), email address, and signatures. States submit UASI NSGP grant information on behalf of the nonprofit applicant using the Department of Health and Human Services (HHS) Grants.gov. Information is then transferred into the FEMA Non-Disaster (ND) Grants Management System which consolidates the entire non-disaster grants management lifecycle into a single system. The FEMA ND Grants system is currently adjudicated by DHS under the FEMA Grant Management Programs PIA and the related DHS/FEMA – 004 Grant Management Information Files SORN, 74 FR 39,705 (Aug. 7, 2009).

2. Project or Program status		Existing	
Date first developed:	**September 29, 2010**	**Pilot launch date:**	Click here to enter a date.
Date last updated:	**September 29, 2010**	**Pilot end date:**	**October 31, 2013**

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

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	☐ This program does not collect any personally identifiable information[1]

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.
The UASI NSGP collects the following information about grant applicant's and state POC or representative: Name;   Title/Position;   Mailing address(es);   Email address(es); and   Phone number(s).

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

5. Does this system employ any of the following technologies: *If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.*	☐ Closed Circuit Television (CCTV) ☐ Sharepoint-as-a-Service ☐ Social Media ☐ Mobile Application (or GPS) ☐ Web portal[2]

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[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.

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	☒ None of the above
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 next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.
If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

6. **Does this project or program connect, receive, or share PII with any other DHS programs or systems⁴?**	☐ No. ☒ Yes. If yes, please list: FEMA ND Grants
7. **Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?**	☐ No. ☒ Yes. If yes, please list: HHS Grants.gov
Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Choose an item. Please describe applicable information sharing governance in place. N/A

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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.

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.

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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J. Sykes
Date submitted to DHS Privacy Office:	Click here to enter a date.
Component Privacy Office Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
FEMA recommends privacy compliance coverage by the FEMA Grant Management Programs PIA and the related DHS/FEMA – 004 Grant Management Information Files SORN.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	**Jameson Morgan**
Date approved by DHS Privacy Office:	August 13, 2013
PCTS Workflow Number:	**986425**

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	IT System If "other" is selected, please describe: Click here to enter text.
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☐ Privacy Act Statement required. ☒ Privacy Impact Assessment (PIA) required. ☒ System of Records Notice (SORN) required.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/FEMA/PIA – 013 Grant Management Programs
SORN:	System covered by existing SORN

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If covered by existing SORN, please list: DHS/FEMA-004 Grant Management Information Files

DHS Privacy Office Comments:
Please describe rationale for privacy compliance determination above.

The DHS Privacy Office concurs with the FEMA Privacy Office's assessment. This system will receive coverage under the DHS/FEMA/PIA – 013 Grant Management Programs PIA and the DHS/FEMA – 004 Grant Management Information Files SORN.

This program helps provide funding support for target hardening and other physical security enhancements and activities to nonprofit organizations that are at high risk of terrorist attack. The system also integrates nonprofit preparedness activities with broader State and local preparedness efforts. In order to fulfill this mission, the system must collect a minor amount of PII from grant applicants and state points-of-contact (POC) and or representatives such as: name, address, phone number(s), and email address.

The DHS/FEMA/PIA – 013 Grant Management Programs PIA provides sufficient coverage for the information collection described in this PTA as the purpose of the PIA is to allow for information to be collected in order to determine awards for disaster and non-disaster grants, and for the issuance of awarded funds.

The DHS/FEMA – 004 Grant Management Information Files SORN provides coverage to systems of records related to determining awards for disaster and non-disaster grants, and for the issuance of awarded funds. The collection of information in this system is consistent with the purpose, categories of records, and categories of individuals, and routine uses of this SORN.