



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.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	FEMA Transit Security Grant Program (TSGP)		
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:	Steven P. Billings		
Office:	GPD/PGD/TISB	Title:	Investigative Analyst
Phone:	202-786-9516	Email:	Steven.Billings1@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:	August 23, 2013
Date submitted to DHS Privacy Office:	August 23, 2013
Date approved by DHS Privacy Office:	September 11, 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.

The Federal Emergency Management Agency (FEMA) Grant Programs Directorate (GPD) manages the Transit Security Grant Program (TSGP). The TSGP is a FEMA grant program that focuses on transportation infrastructure protection activities. The collection of information for TSGP is mandated by Section 1406, Title XIV of the Implementing Recommendations of the 9/11 Commission Act of 2007, 6 U.S.C. §1135, which directs the Secretary to establish a program for making grants to eligible public transportation agencies for security improvements. Additionally, the above authorities ,authorizes the Secretary to determine the requirements for grant recipients, including application requirements.

TSGP provides funding directly to public transportation (which include intra-city bus, commuter bus, and all forms of passenger rail) entities to facilitate training, infrastructure hardening, exercises, public awareness and operational packages to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies

Information related to the TSGP is collected as part of OMB ICR No. 1660-0112 from the general public, specifically, State, local, and private organizations requesting federal funds. During the application process, grant applicant’s points-of-contact (POC) and or representatives provide their name, title, address, phone number(s), email address, and signatures. Grant applicants enter TSGP grant information, including the above PII of POCs and representatives into the U.S. Health and Human Services (HHS) Grants.gov system. Additional information supporting the grant application is uploaded and entered 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.

2. Project or Program status

Existing

Date first developed:	FY 2005	Pilot launch date:	Click here to enter a date.
Date last updated:	October 31, 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



	<input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> This program does not collect any personally identifiable information ¹
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<p>4. What specific information about individuals could be collected, generated or retained? <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i></p>	
<p>The TSGP collects the following information about grant applicant's POC and or representative: Name; Title; Mailing address(es); Email address(es); Phone number(s); and Signatures.</p>	
<p>Does the Project or Program use Social Security Numbers (SSNs)?</p>	No
<p>If yes, please provide the legal authority for the collection of SSNs:</p>	N/A
<p>If yes, please describe the uses of the SSNs within the Project or Program:</p>	N/A

<p>5. Does this system employ any of the following technologies: <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
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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.



	<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>	
<p>Click here to enter text.</p>	

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

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.



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: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Recommend 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:	September 11, 2013
PCTS Workflow Number:	992625

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:	<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/FEMA/PIA – 013 Grant Management Programs
SORN:	System covered by existing SORN



	If covered by existing SORN, please list: DHS/FEMA-004 Grant Management Information Files
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with FEMA Privacy Office’s assessment that the Transit Security Grant Program (TSGP) requires coverage under the DHS/FEMA/PIA – 013 Grant Management Program PIA and the DHS/FEMA – 004 Grant Management Information Files SORN.</p> <p>This program collects general PII related to funding public transportation entities to facilitate training, infrastructure hardening, exercises, public awareness and operational packages to protect critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies. In order to provide these grants, TGSP must receive general information from members of the public requesting such grants. The DHS/FEMA/PIA – 013 Grant Management Programs PIA provides coverage to TSGP because it allows information to be collected in order to determine awards for both disaster and non-disaster grants and for the issuance of awarded funds. The DHS/FEMA – 004 SORN provides coverage for records collected by TSGP in order to assist in determining awards for both disaster and non-disaster grants, for the issuance of awarded funds, and to allow DHS to contact individuals to ensure completeness and accuracy of grants and applications.</p>	