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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SUMMARY INFORMATION

Project or Program Name:	Tribal Homeland Security Grant Program (OMB No. 1660-0113)		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Office of 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:	LaTanya Watson		
Office:	**Grant Programs Directorate**	**Title:**	Program Specialist
Phone:	**202-786-9540**	**Email:**	Latanya.watson@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:	March 25, 2013
Date submitted to DHS Privacy Office:	May 15, 2013
Date approved by DHS Privacy Office:	May 29, 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 Federal Emergency Management Agency (FEMA) Office of Protection and National Preparedness (PNP) Grant Programs Directorate (GPD) collects Federal grant application information to determine eligibility of tribes to receive federal funding as authorized by OMB ICR 1660-0113. This PTA is being conducted as part of the collection renewal process. FEMA's Tribal Homeland Security Grant Program (THSGP) (formerly the State Homeland Security Program (SHSP) – Tribal) is authorized by Sections 2004 and 2005 of the Homeland Security Act of 2002, as amended by Section 101, Title I of the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. Law No. 110-53, (6 U.S.C. §§ 605 and 606). THSGP provides supplemental funding to eligible tribes to help strengthen the Nation against risks associated with potential terrorist attacks. THSGP supports building and sustaining capabilities through planning, equipment, training, and exercise activities. THSGP applicants apply for the grant using the U.S. Department of Health and Human Services (HHS) grants.gov site and then THSGP grant application information is transferred to the FEMA Non Disaster (ND) Grants system for award processing. FEMA's ND Grants system is currently adjudicated under the DHS/FEMA/PIA-013 - Grant Management Programs Privacy Impact Assessment (PIA). THSGP grantees are tribes within the United States. THSGP applicants self-certify that they are eligible to apply for funding by using an Eligibility Certification Form that is part of the excel-based Investment Justification template. The Investment Justification template is divided into 3 sections, 1) Introduction, 2) Eligibility Certification Form, and 3) Investment Justification. When completing the Eligibility Certification Form, tribes provide the personally identifiable information (PII) of a point of contact (POC) for the investment/grantee. This PII is used for the sole purpose of contacting grantees regarding continued eligibility of federal grant funds and compliance with federal statutes and regulations. All other information collected is non-PII and is for the purpose of determining funding eligibility through the THSGP.

2. Project or Program status		Existing	
Date first developed:	December 1, 2004	**Pilot launch date:**	Click here to enter a date.
Date last updated:	February 16, 2012	**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

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	☒ Members of the public ☐ 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.
Applicants under the Tribal Homeland Security Grant Program complete standard application forms and an Investment Justification template. The forms and template request a point of contact name, phone number and e-mail in case there are any questions during the application processing.

Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	Click here to enter text.
If yes, please describe the uses of the SSNs within the Project or Program:	Click here to enter text.

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 data[3] 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 systems[4]?	☐ No. ☒ Yes. If yes, please list: Non-Disaster (ND) Grants System
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: 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. Click here to enter text.

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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.*	
PIA: DHS/FEMA/PIA-013 - Grant Management Programs SORN: DHS/FEMA-004 Grant Management Information Files (August 7, 2009 74 FR 39705)	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Dayo Simms
Date approved by DHS Privacy Office:	May 29, 2013
PCTS Workflow Number:	**981506**

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Other If "other" is selected, please describe: **Program/ Information Collection**
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: Grant Management Programs, July 14, 2009
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-004 Grant Management Information

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[Files](#) August 7, 2009 74 FR 39705

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

PRIV agrees with the FEMA Privacy Office recommendation that The Tribal Homeland Security Grant Program is privacy sensitive and is covered by the following PIA and SORN:

DHS/FEMA/PIA-013 Grant Management Programs: This covers the collection of limited PII to facilitate the adjudication of FEMA grant applications.

DHS/FEMA-004- Grant Management Information Files: which also covers the collection of limited contact information for grant processing.

We also approve the attached e(3) statement for this information collection.