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
Version date: November 6, 2012
Page 1 of 8

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
Version date: November 6, 2012
Page 2 of 8

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SUMMARY INFORMATION

Project or Program Name:	**Environmental Planning and Historic Preservation (EHP) Clearance/Screening Form (OMB 1660-0115)**		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Grant Programs Directorate Environmental Planning and Historic Preservation Branch
TAFISMA Name:		**TAFISMA Number:**	
Type of Project or Program:	Form or other Information Collection	**Project or program status:**	Operational

PROJECT OR PROGRAM MANAGER

Name:	**Tom Harrington**		
Office:	**GPD-EHP**	**Title:**	Branch Chief
Phone:	**202-786-9791**	**Email:**	Tom.Harrington@dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:			
Phone:		**Email:**	

ROUTING INFORMATION

Date submitted to Component Privacy Office:	February 27, 2013
Date submitted to DHS Privacy Office:	April 29, 2013
Date approved by DHS Privacy Office:	May 6, 2013

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Privacy Threshold Analysis
Version date: November 6, 2012
Page 3 of 8

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 Environmental Planning and Historic Preservation (EHP) screening information authorized by OMB ICR No. 1660-0115. This PTA is being conducted as part of the collection renewal process. The National Environmental Policy Act (NEPA) requires that each Federal agency examine the impact of its actions on the human environment, to look at potential alternatives to that action, to inform both decision-makers and the public of those impacts through a transparent process, and to pursue mitigation if necessary. It does not mandate necessarily that the alternative with the least environmental impacts be selected. A NEPA compliance review process often addresses compliance with other Federal regulations, including the National Historic Preservation Act (NHPA), the Endangered Species Act (ESA), the Clean Water Act (CWA), the Migratory Bird Treaty Act (MBTA), and other authorities to streamline the overall compliance review process.

Environmental Planning and Historic Preservation (EHP) compliance is the process by which the FEMA GPD can ensure that projects that are funded through federal grants are compliant with existing laws and regulations regarding the environment and historic preservation. In order to assure compliance, project information must be provided by the grantee that describes what the action, how it would be accomplished, and where it would take place. To simplify the collection of required information, and to streamline compliance determinations with relevant laws, it was necessary to standardize the format in which information is submitted to FEMA GPD. The GPD Environmental Screening Form (Screening Form) provides a user-friendly format for collecting essential information.

The information collected by FEMA GPD from grant recipients via the Screening Form will be used for EHP reviews that will examine the potential environmental, historic, and cultural impact of the projects for which grant funding is requested before approving the project, as required by NEPA, NHPA, and other Federal environmental and historic preservation laws and regulations. Grantee and subgrantees are state, tribal, and local governments as well as eligible private non-profit organizations. The personally identifiable information (PII) requested under this collection is limited to point of contact (POC) information of Grantees and subgrantees. This PII is used for the sole purpose of contacting grantees and subgrantees regarding continued eligibility of federal grant funds and compliance with federal statutes and regulations.

FEMA GPD owns and uses the Project Information Management System (PIMS), at a headquarters level as a repository for EHP Screening Form information and to assist in processing EHP compliance for grants. PIMS is a Microsoft Access based database and is only accessible by FEMA staff.

2. Project or Program status		Existing	
Date first developed:	~~November 1, 2009~~November 1,	**Pilot launch date:**	Click here to enter a date.

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Privacy Threshold Analysis
Version date: November 6, 2012
Page 4 of 8

	2009		
Date last updated:	**July 1, 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 ☒ 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.
FEMA may collect the following point of contact (POC) information from grantee and subgrantee of awarded DHS Grants: Name (First and last), Title, Mailing address, Email address, and Work phone number.

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:	☐ Closed Circuit Television (CCTV)

[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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Privacy Threshold Analysis
Version date: November 6, 2012
Page 5 of 8

If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.	☐ Sharepoint-as-a-Service ☐ Social Media ☐ Mobile Application (or GPS) ☐ Web portal[2] ☒ 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: Click here to enter text.
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: Click here to enter text.
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.

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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 Analysis
Version date: November 6, 2012
Page 6 of 8

	Click here to enter text.

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Privacy Threshold Analysis
Version date: November 6, 2012
Page 7 of 8

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Le Var 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 6, 2013
PCTS Workflow Number:	**979868**

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: **Form/ 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

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Privacy Threshold Analysis
Version date: November 6, 2012
Page 8 of 8

	If covered by existing SORN, please list: DHS/FEMA-004 Grant Management Information 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 EHP Screening Form is privacy sensitive and contains contact information from FEMA grantees and sub-grantees. This information is covered under the Grant Management Programs PIA, which covers the collection of contact information for grant applying agency contacts. Additionally, the Grant Management Information Files SORN covers this collection of information.	