



## **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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	Public Assistance (PA) Program (1660-0017)		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	ORR-Recovery-PA
<b>TAFISMA Name:</b>	N/A	<b>TAFISMA Number:</b>	N/A
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Operational

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Cliff Brown		
<b>Office:</b>	ORR-Recovery-PA	<b>Title:</b>	Program Specialist
<b>Phone:</b>	202.646.4136	<b>Email:</b>	Cliff.Brown@fema.dhs.gov

### INFORMATION SYSTEM SECURITY OFFICER (ISSO)

<b>Name:</b>	Click here to enter text.		
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	Click here to enter text.

### ROUTING INFORMATION

<b>Date submitted to Component Privacy Office:</b>	February 14, 2013
<b>Date submitted to DHS Privacy Office:</b>	February 28, 2013
<b>Date approved by DHS Privacy Office:</b>	February 28, 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 mission of the Federal Emergency Management Agency's (FEMA) Public Assistance (PA) Grant Program is to provide assistance to State, Tribal and local governments, and certain types of Private Non-Profit (PNP) organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. Specifically, the program provides assistance for debris removal, emergency protective measures, and the repair, replacement, or restoration of disaster-damaged, publicly owned facilities and the facilities of certain PNP organizations. The PA Program also encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process.

The program uses standard forms for PA collections as a well as narratives that do not use forms including: appeals; requests and recommendations for arbitrations; State Administrative Plans and amendments; requests for time extensions; and requests for additional funding.

**2. Project or Program status**

Existing

<b>Date first developed:</b>	<b>December 17, 2008</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date last updated:</b>	<b>7/1/09</b>	<b>Pilot end date:</b>	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<sup>1</sup>

<sup>1</sup> 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.



**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.*

Certain Privacy Act forms require names, work address, work and cell phone and email address. The forms include:

- **FF 90-49 Request for Public Assistance** – The *Request* asks for general information from the State (Grantee) that identifies the applicant and starts the grant process.

**Name, title, business phone, fax number, home phone, cell phone, and email address**

- **FF 90-91 Project Worksheet (PW)** – FEMA or the applicant (sub-grantee), assisted by the State as appropriate will prepare a *PW* for each project. Federal funds are obligated to the State based on the approved *PW*. The State will then approve sub grants based on the *PWs* approved for each applicant.

**Name, title, and signature**

- **FF 90-91A Damage Description and Scope of Work Continuation Sheet (PW)** – FEMA or the applicant (sub-grantee) assisted by the State as appropriate will prepare a *PW* for each project. The scope of work is developed on the *PW* describing in detail the work necessary to return the facility to its pre-disaster design. The optional *PW - Damage Description and Scope of Work Continuation Sheet* provides additional space for this purpose.

**Name, title, and signature**

- **FF 90-91B Cost Estimate Continuation Sheet (PW)** FEMA or the applicant (sub-grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Project Cost is developed on the *PW* estimating the cost for repair of the damages described in the Project Description of the *PW*. The optional *PW- Cost Estimate Continuation Sheet* provides additional space to estimate the cost to restore the facility to its pre-disaster condition.

**Name, title, and signature**

- **FF 90-91C Maps and Sketches Sheet (PW)** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The optional *PW – Maps and Sketches Sheet* provides field personnel with specific information that enables the facility to be easily located should a site visit be necessary and damages to be described in terms of the function of the facility and its features, or items requiring repair, before work is accomplished because it can affect eligibility determinations.

N/A

- **FF 90-91D Photo Sheet (PW)**- FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The optional *PW – Photo Sheet* provides field personnel with specific information that enables facility damages to be documented before work is accomplished because it can affect eligibility determinations.

N/A



**FF 90-111 Grantee Quarterly Progress Report** – Grantee and sub-grantee assisted by FEMA as appropriate – This quarterly progress report is used to monitor performance and financial status of grantees.

- **FF 90-120 Special Considerations Questions** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The Special Considerations Questions may be used to record factors that could affect compliance with environmental resources, disaster assistance, and historic preservation legislation and Executive Orders on floodplain, wetlands, and environmental justice.

N/A

- **FF 121 PNP Facility Questionnaire** – The optional PNP Facility Questionnaire, is used by FEMA and State personnel to help determine the eligibility of specific facilities to be approved as a PNP organization.

**Name of Contact Person**

- **FF 90-123 Force Account Labor Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The optional Force Account Labor Summary Record may be used to record applicant personnel costs.

**Name and title**

- **FF 90-124 Materials Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The optional Materials Summary Record may be used to record the supplies and materials an applicant may take out of stock or purchase.

**Name and title**

- **FF 90-125 Rented Equipment Summary Record** - FEMA or the applicant (sub grantee) assisted by the State as appropriate will prepare a *PW* for each project. The optional Rented Equipment Summary Record may be used to record the costs of rented or leased equipment.

**Name and title**

**FF 90-126 Contract Work Summary Record** – FEMA or the applicant (sub grantee) assisted by the State as appropriate, will prepare a *PW* for each project. The optional Contract Work Summary Record may be used to record the costs or work that an applicant has done by contract.

**Name and title**

- **FF 90-127 Force Account Equipment Summary Record** – FEMA or the applicant (subgrantee) assisted by the State as appropriate, will prepare a *PW* for each project. The optional Force Account Equipment Summary Record may be used to record applicant equipment costs.

**Name and title**

- **FF 90-128 Applicant's Benefits Calculation Worksheet** - FEMA or the applicant (subgrantee) assisted by the State as appropriate will prepare a *PW* for each project. The optional Applicant's Benefits Calculation Worksheet may be used to record the costs fringe benefits for force account labor.

**Name and title**



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

<b>5. Does this system employ any of the following technologies:</b>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> SharePoint-as-a-Service (SPaaS) <input type="checkbox"/> Customer Relationship Management-as-a-Service (CRMaas) <input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input checked="" type="checkbox"/> Web portal <sup>2</sup> None of the above
<b>If this project is a technology/system, does it relate solely to infrastructure?</b>  <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
<b>If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	
Click here to enter text.	

<sup>2</sup> 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.”

<sup>3</sup> 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.



<b>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	Choose an item. Please describe applicable information sharing governance in place. <a href="#">Click here to enter text.</a>

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<sup>4</sup> 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)

<b>Component Privacy Office Reviewer:</b>	Lane Raffray
<b>Date submitted to DHS Privacy Office:</b>	February 26, 2013
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Recommend the following coverage:	
For the PA Program:	
PIA: DHS/FEMA/PIA-013 - Grant Management Programs (which covers EMMIE).	
SORN: DHS/FEMA-004 - Grant Management Information Files System of Records, 74 FR 39705 (August 7, 2009).	
For forms also used for HMGP:	
PIA: DHS/FEMA/PIA-025 – Hazard Mitigation Grant Program (HMGP) System.	
SORN: DHS/FEMA-009 - Hazard Mitigation Assistance Grant Programs System of Records, 77 FR 17783 (July 23, 2012).	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	Debra Danisek
<b>Date approved by DHS Privacy Office:</b>	February 28, 2013
<b>PCTS Workflow Number:</b>	Click here to enter text.

## DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If “no” PTA adjudication is complete.
<b>Category of System:</b>	Other If “other” is selected, please describe: <b>Form/Information Collection</b>
<b>Determination:</b>	<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





<p>applies.</p> <p><input checked="" type="checkbox"/> Privacy Act Statement required.</p> <p><input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required.</p> <p><input checked="" type="checkbox"/> System of Records Notice (SORN) required.</p>	
<b>PIA:</b>	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list: DHS/FEMA/PIA-013 <a href="#">Grant Management Programs</a> and DHS/FEMA/PIA-025 - <a href="#">The Hazard Mitigation Grant Program (HMGP) System</a></p>
<b>SORN:</b>	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list: <a href="#">DHS/FEMA-004 Grant Management Information Files</a> August 7, 2009 74 FR 39705 and <a href="#">DHS/FEMA-009- Hazard Mitigation Assistance Grant Programs System of Records July 23, 2012, 77 FR, 17783</a></p>
<p><b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i></p> <p>FEMA submits this PTA and accompanying e(3) statement for review. The e(3) statement is to be used on all forms mentioned above that collect PII. PII collected only pertains to contact information for State, local, and tribal partners seeking grant funding. FEMA grant programs are directed at a broad spectrum of state and local emergency responders, including firefighters, emergency medical services, emergency management agencies, law enforcement, and public officials. Due to the coverage by two different PIAs and SORNs, the e(3) statement has been written to include both SORNs. It may be used for all forms included as part of this PTA.</p> <p>All of the above forms, with the exception of FEMA Form 90-111, are used for the Public Assistance Grant Program. DHS Privacy Office approves these forms as privacy-sensitive, with coverage under the existing DHS/FEMA/PIA-013 - Grant Management Programs and DHS/FEMA-004 Grant Management Information Files SORN.</p> <p>FEMA Form 90-111 is used for both the Public Assistance Grant Program and the Hazard Mitigation Grant Program. Therefore, DHS Privacy Office approves FF 90-111 with coverage under both the existing DHS/FEMA/PIA-013 - Grant Management Programs and DHS/FEMA-004 Grant Management Information Files SORN and the existing DHS/FEMA/PIA-025 – The Hazard Mitigation Grant Program (HMGP) System and corresponding DHS/FEMA-009 - Hazard Mitigation Assistance Grant Programs System of Records.</p>	