



**Homeland
Security**

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
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www.dhs.gov/privacy

Privacy Threshold Analysis
Version date: June 10, 2010
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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
Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt from the 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: 703-235-0780.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: February 14, 2012

Name of Project: Hazard Mitigation Grant Program (HMGP)

System Name in TAFISMA: Hazard Mitigation Grant Program (HMGP)

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Shabbar Saifee

Email for Project Manager: Shabbar.saifee@fema.dhs.gov

Phone Number for Project Manager: 202-646-3142

Type of Project:

Information Technology and/or System.*

A Notice of Proposed Rule Making or a Final Rule.

Form or other Information Collection.

Other: <Please describe the type of project including paper based Privacy Act system of records.>

* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•“Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•“Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note: for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



SPECIFIC QUESTIONS

1. Describe the project and its purpose:

Authorized by Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (the Stafford Act), the Federal Emergency Management Agency's (FEMA) Federal Insurance and Mitigation Administration (FIMA) administers grant programs for states and localities that seek to implement activities and projects in order to reduce or eliminate risk of future damage to life or property. The Hazard Mitigation Grant Program (HMGP) is one such program. The key purpose of HMGP is to ensure that the opportunity to take critical mitigation measures to reduce the risk of loss of life and property from future disasters is not lost during the reconstruction process following a disaster. HMGP may fund mitigation activities for properties that are not insured by the National Flood Insurance Program (NFIP).

HMGP information is collected and maintained in the Hazard Mitigation Grants Program IT system. The IT system collects and stores grant applications for applicants and sub-applicants associated with a Presidential major disaster declaration. The application information includes notations and reports of decisions from insurance, disaster, or similar financial aid and/or income from other Federal and State agencies, insurance companies, employer, bank, financial or credit data service, and public or private entities as they relate to payments and/or financial assistance received by individual property owner for property included in the grant application.

Applicants are the states involved in the disaster and sub-applicants can include state agencies, Indian Tribal governments, local governments or communities, and private non-profit organizations.

Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: August 30, 1998

Date last updated: August 15, 2011

Description: General system enhancements and bug fixes to internal and external functional areas of the HMGP system.

2. From whom do you collect, process, or retain information on: (Please check all that apply)

DHS Employees.

Contractors working on behalf of DHS.



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- The Public.
- The System does not contain any such information.

3. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)

- No.
- Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

4. What information about individuals could be collected, generated or retained?

The personally identifiable information that **may** be collected or retained includes:

Applicant/co-applicant (public): the individual property owners' names, co-owner, title holder, individual owner's damaged property address, individual property owner's home phone number, individual property owner's office phone number, individual property owner's cell phone number, individual property owner's mailing address, individual property owner's status regarding flood insurance, individual property owner's National Flood Insurance Program (NFIP) policy number, individual property owner's insurance policy provider for the property proposed to be mitigated with FEMA funds, individual property owner's signature, Governor's authorized representative name, Governor's authorized representative signature, grant applicant organization point of contact (POC) name, grant applicant POC organization, grant application POC office phone number, grant applicant POC office mailing address, and grant applicant POC email address.

FEMA employees or contractors: name and title.

5. 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 the next question.
- Yes. Is there a log kept of communication traffic?
 - No. Please continue to the next question.
 - Yes. What type of data is recorded in the log? (Please choose all that apply.)
 - Header.
 - Payload Please describe the data that is logged.



6. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems¹?

No.

Yes.

Please list: **FEMA's Enterprise Data Warehouse (EDW)**

7. Is there a Certification & Accreditation record within OCIO's FISMA tracking system?

Unknown

No.

Yes. Please indicate the determinations for each of the following:

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: February 15, 2012

Name of the DHS Privacy Office Reviewer: Brian E. Anderson

DESIGNATION

This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System
Category of System

IT System.

National Security System.

¹ 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.



- Legacy System.
- HR System.
- Rule.
- Other:

Determination

- PTA sufficient at this time.
- Privacy compliance documentation determination in progress.
- PIA is not required at this time.
- PIA is required.
 - System covered by existing PIA:
 - New PIA is required.
 - PIA update is required.
- SORN not required at this time.
- SORN is required.
 - System covered by existing SORN: DHS/FEMA 009 Hazard Mitigation Assistance Grant Programs
 - New SORN is required.

DHS PRIVACY OFFICE COMMENTS: THE HMGP IT SYSTEM HAS BEEN RECENTLY DECOUPLED FROM NEMIS. NEMIS HMGP REQUIRES A NEW PIA. ALL OTHER HAZARD MITIGATION ASSISTANCE GRANT PROGRAMS ARE MAINTAINED WITHIN THE MITIGATION E-GRANTS IT SYSTEM.

THE DHS/FEMA 009 SORN IS BEING UPDATED.