



**Homeland
Security**

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
703-235-0780, pia@dhs.gov
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 DHSCconnect 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:

Name of Project: National Flood Insurance

System Name in TAFISMA: <Please enter the name.>

Name of Component: Mitigation Directorate, FEMA/DHS

Name of Project Manager: Susan Bernstein

Email for Project Manager: Susan.Bernstein1@dhs.gov

Phone Number for Project Manager: 202-212-2113

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:

The purchase of flood insurance is mandatory when the property is located in a high flood risk areas in communities that are participating in the National Flood Insurance Program (NFIP) and if there is a federally related loan for a home or business. The Mortgage Portfolio Protection program (MPPP) is an option that companies participating in the NFIP can use to ensure that mortgage loan portfolios are in compliance with flood insurance purchase requirements if the property owner refuses to buy flood insurance. Insurance companies applying for or renewing their participation in the NFIP Write Your Own (WYO) program (which allows them to sell NFIP flood insurance) must indicate that they will adhere to the requirements of the MPPP if they are electing to voluntarily participate in the MPPP.

WYO companies participating in the MPPP must provide a detailed implementation package, known as the MPPP Agreement, to the lending companies who are requesting insurance coverage and the lender must acknowledge receipt. A WYO company will review the Financial Assistance/Subsidy Arrangement, and complete the Notice of Acceptance acknowledgement either agreeing to participate in the MPPP or electing to continue under just the WYO guidelines. This allows FEMA to maintain a list of companies that are participating in the MPPP and can assure that insurance policies written under the MPPP are done so by appropriate WYO companies. Without the MPPP many loans would not meet federal requirements and would not be maintainable.

2. Status of Project:

This is a new development effort.

X This is an existing project.

Date first developed: January 1, 1991

Date last updated: 2010

The program has not changed, the number of companies that participate does change periodically.

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

DHS Employees.

Contractors working on behalf of DHS.

The Public.

X The System does not contain any such information.



4. 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:

The MPPP does not collect SSNs.

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

The government does not collect, generate or retain information about individuals through the MPPP.

6. 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.

<Please list the data elements in the log.>

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

No.

Yes.

Please list:

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.



8. 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:

Name of the DHS Privacy Office Reviewer: <Please enter name of reviewer.>

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.

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.



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- 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:
 - New SORN is required.

DHS PRIVACY OFFICE COMMENTS