



## **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>	<b>FEMA Homeland Security Grant Program (HSGP) and Operation Stonegarden (OPSG) Grant Program</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Protection and National Preparedness (PNP)
<b>TAFISMA Name:</b>	Click here to enter text.	<b>TAFISMA Number:</b>	Click here to enter text.
<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>	Julie Verneti		
<b>Office:</b>	GPD	<b>Title:</b>	Program Analyst
<b>Phone:</b>	202-786-9857	<b>Email:</b>	Julie.Verneti1@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>	July 15, 2013
<b>Date submitted to DHS Privacy Office:</b>	August 23, 2013
<b>Date approved by DHS Privacy Office:</b>	September 23, 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 FEMA Grants Program Directorate (GPD) manages FEMA’s Homeland Security Grant Program (HSGP). The HSGP is an important part of the Administration’s larger, coordinated effort— known as the Federal Investment Strategy— to strengthen homeland security preparedness. The HSGP implements objectives addressed in a series of post-9/11 laws, strategy documents, plans, and Homeland Security Presidential Directives (HSPDs). FEMA manages the HSGP pursuant to section 603 of the Homeland Security Act of 2002 as amended (HSA), 6 U.S.C. § 101 et seq.), and from the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. L. No. 110-053.

Additionally, the GPD manages the FEMA Operation Stonegarden (OPSG) Grant Program. The OPSG Grant Program provides funding to designated localities to enhance cooperation and coordination between Federal, State, local, and tribal law enforcement agencies in a joint mission to secure the U.S. borders along routes of ingress from International borders to include travel corridors in States bordering Mexico and Canada, as well as States and territories with International water borders. Funding is used to increase operational capabilities of Federal, State, local and tribal law enforcement, promoting a layered, coordinated approach to law enforcement within U.S. Border States and territories.

The OPSG Grant Program is a component of the FEMA HSGP, and is managed in accordance with Section 2004(a) of the HSA , as amended by Section 101, Title I of the Implementing Recommendations of the 9/11 Commission Act of 2007, Pub. L. No. 110-053.

Information related to the OPSG Grant Program is currently collected as part of OMB ICR No. 1660-0119, however, OPSG Grant Program is being reviewed to be consolidated under the HSGP which is covered by the OMB ICR No. 1660-0125. Information for both grant programs are collected from the general public, specifically, State, local, and tribal governments requesting federal funds. During the application process, grant applicant’s points-of-contact (POC) and or representatives provide their name, title, address, phone number(s), email address, and signatures.

Grant applicants enter HSGP and OPSG grant information into the U.S. Health and Human Services (HHS) Grants.gov system. Grants.gov then transfers information into the FEMA Non-Disaster (ND) Grants Management System which consolidates the entire non-disaster grants management lifecycle into a single system. Grant specific supporting documents and information is uploaded and entered into the FEMA ND Grants system by the grant applicant. The FEMA ND Grants system is currently adjudicated by DHS under the FEMA Grant Management Programs PIA and the related DHS/FEMA – 004 Grant Management Information Files SORN.

<b>2. Project or Program status</b>		Existing	
<b>Date first developed:</b>	<b>October 31, 2010</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date last updated:</b>	<b>October 31, 2010</b>	<b>Pilot end date:</b>	Click here to enter a date.



<p><b>3. From whom does the Project or Program collect, maintain, use or disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> This program does not collect any personally identifiable information<sup>1</sup></p>
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<p><b>4. What specific information about individuals could be collected, generated or retained?</b> <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i></p>	
<p>The HSGP and OPSG Grant Program collects the following information about grant applicant's POC or representative:</p> <p>Name;</p> <p>Title;</p> <p>Mailing address(es);</p> <p>Email address(es);</p> <p>Phone number(s); and</p> <p>Signature.</p>	
<p><b>Does the Project or Program use Social Security Numbers (SSNs)?</b></p>	<p>No</p>
<p><b>If yes, please provide the legal authority for the collection of SSNs:</b></p>	<p>Click here to enter text.</p>
<p><b>If yes, please describe the uses of the SSNs within the Project or Program:</b></p>	<p>Click here to enter text.</p>

<p><b>5. Does this system employ any of the following technologies:</b> <i>If project or program utilizes any of these</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Sharepoint-as-a-Service</p>
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<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.



<i>technologies, please contact Component Privacy Officer for specialized PTA.</i>	<input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal <sup>2</sup> <input checked="" type="checkbox"/> 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>	
<a href="#">Click here to enter text.</a>	

<b>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: FEMA ND Grants
<b>7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: HHS Grants.gov
<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>

<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.

<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.



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, [pia@dhs.gov](mailto:pia@dhs.gov)  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)

**Privacy Threshold Analysis**  
**Version date: November 6, 2012**  
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## PRIVACY THRESHOLD REVIEW

### (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	LeVar J. Sykes
<b>Date submitted to DHS Privacy Office:</b>	Click here to enter a date.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Recommend coverage by the FEMA Grant Management Programs PIA and the related DHS/FEMA – 004 Grant Management Information Files SORN.	

### (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	Jameson Morgan
<b>Date approved by DHS Privacy Office:</b>	September 23, 2013
<b>PCTS Workflow Number:</b>	992624

## DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If “no” PTA adjudication is complete.
<b>Category of System:</b>	IT System If “other” is selected, please describe: Click here to enter text.
<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 applies. <input type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required.
<b>PIA:</b>	System covered by existing PIA If covered by existing PIA, please list: DHS/FEMA/PIA – 013 <a href="#">Grant Management Programs</a>
<b>SORN:</b>	System covered by existing SORN



	If covered by existing SORN, please list: <a href="#">DHS/FEMA-004 Grant Management Information Files</a>
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with FEMA Privacy Office’s assessment that the Homeland Security Grant Program (HSGP) and Operation Stonegarden (OPSG) Grant Program requires coverage under the DHS/FEMA/PIA – 013 Grant Management Program PIA and the DHS/FEMA – 004 Grant Management Information Files SORN. The Appendix to the Grant Management Program PIA will be updated to reflect coverage of HSGP and OPSG.</p> <p>This program collects general PII in order to provide funding via grants to designated localities to enhance cooperation and coordination between Federal, State, local, and tribal law enforcement agencies. In order to provide grants through both systems (HSGP and OPSG), FEMA must receive general information from members of the public requesting such grants. The DHS/FEMA/PIA – 013 Grant Management Programs PIA provides coverage to HSGP and OPSG because it allows information to be collected in order to determine awards for both disaster and non-disaster grants and for the issuance of awarded funds. The DHS/FEMA – 004 SORN provides coverage for records collected by HSGP and OPSG in order to assist in determining awards for both disaster and non-disaster grants, for the issuance of awarded funds, and to allow DHS to contact individuals to ensure completeness and accuracy of grants and applications. The DHS/FEMA/PIA – 013 Grant Management Programs PIA Appendix will be updated to reflect coverage of HSPG and OPSG.</p>	