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
Page 1 of 6

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:

LeVar J. Sykes
Senior Privacy Analyst
The Privacy Office
Federal Emergency Management Agency
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-212-2201

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: 202-212-2201.

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Privacy Threshold Analysis
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Page 2 of 6

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: May 17, 2012

Name of Project: Grant Reporting Tool

System Name in TAFISMA: Grants Reporting Tool (GRT)

Name of Component: Federal Emergency Managment Agency

Name of Project Manager: Kathy Fletcher

Email for Project Manager: Kathy.Fletcher@fema.dhs.gov

Phone Number for Project Manager: 202.786.9628

Type of Project:
☒ **Information Technology and/or System.***

☐ **A Notice of Proposed Rule Making or a Final Rule.**

☐ **Form or other Information Collection.**

☐ **Other:**

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* 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.

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Page 3 of 6

SPECIFIC QUESTIONS

1. **Describe the project and its purpose:**

   The Grants Reporting Tool (GRT) improves the accuracy and efficiency of Homeland Security's annual award and biannual grant reporting by providing a user-friendly web-based reporting system. It is designed to help State Administrative Agencies (SAAs) meet all grant-related reporting requirements identified in the Homeland Security Grant Program (HSGP), Urban Areas Security Initiative (UASI), and the Transit Security Grant Program (TSGP) grant application kits. The GRT will be used to capture all grant data (i.e. HSGP, UASI, TSGP, Buffer Zone Protection Program (BZPP), Intercity Passenger Rail Security Grant Program (IPRSGP)) from planned obligations in the Initial Strategy Implementation Plan (ISIP) process, twice yearly expenditure updates through the Biannual Strategy Implementation Report (BSIR) process, and final funding in the close-out reporting period.

2. **Status of Project:**

   ☐ This is a new development effort.

   ☒ This is an existing project.

   > Date first developed: November 18, 2004

   > Date last updated: March 15, 2012

   > This release is to address 6 Change Requests and 5 Defect Requests for GRT.

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.

   ☐ 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:

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Privacy Threshold Analysis
Version date: June 10, 2010
Page 4 of 6

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

Users are required to provide personal information to receive access to the system. GRT collects:

• Name Prefix

• First name

• Last Name

• Street Address

• City

• State

• Zip Code

• Office Phone number

• Fax number

• Email address

• Organizational Affiliation

• Urban Area Affiliation (if applicable)

• Security Question which is one of the following:

       1. What is your first pet's name?

       2. What is your father's middle name?

       3. What is your high school mascot?

       4. Who is your childhood best friend?

• Unique username
• Password
• Role Assignment and User Permissions

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.

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Privacy Threshold Analysis
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Page 5 of 6

☐ Yes. What type of data is recorded in the log? (Please choose all that apply.)

☐ Header.

☐ Payload Please describe the data that is logged.

7. **Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems[1]?**

☒ No.

☐ Yes.

Please list:

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: May 18, 2012

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

DESIGNATION

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[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.

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Privacy Threshold Analysis
Version date: June 10, 2010
Page 6 of 6

☐ **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.

            ☒ System covered by existing PIA: DHS/FEMA/PIA-013 Grant Management Programs

            ☐ New PIA is required.

            ☐ PIA update is required.

        ☐ SORN not required at this time.

        ☒ SORN is required.

            ☒ System covered by existing SORN: DHS/FEMA-004 Grant Management Information Files

            ☐ New SORN is required.

DHS PRIVACY OFFICE COMMENTS