



## **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>Regional Catastrophic Preparedness Grant Program (RCPGP)</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>	Update

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Nicholas Sleptzoff		
<b>Office:</b>	FEMA-NPD-NIC	<b>Title:</b>	Program Specialist
<b>Phone:</b>	202-212-3794	<b>Email:</b>	Nicholas.sleptzoff@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>	November 20, 2013
<b>Date submitted to DHS Privacy Office:</b>	November 25, 2013
<b>Date approved by DHS Privacy Office:</b>	December 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 PNP National Preparedness Directorate (NPD) manages the Regional Catastrophic Preparedness Grant Program (RCPGP). The RCPGP provides grant funding to ten, specified, highest risk urban areas and their surrounding regions for catastrophic preparedness planning. It builds upon state and urban area efforts to plan for catastrophic incidents, addresses Post-Katrina Emergency Management Reform Act mandates, and reinforces initiatives under way with the implementation of Presidential Policy Directive 8. Each of the 10 regions has a Regional Catastrophic Preparedness Team (RCPT) that consists of Federal, State, and local emergency management professionals and first responders. FEMA administers and manages federal funding to support catastrophic preparedness planning within FEMA's 10 regions. A State can apply for grant funding to support the RCPT(s).

The RCPT uses SharePoint services hosted at the Department of Energy's Argonne National Laboratory and sponsored by FEMA. This allows the teams to collaborate on documents and lessons learned with each other in a secure environment.

FEMA collects information from State, and RCPTs seeking RCPGP funding. Information collected by FEMA from States and RCPTs includes personally identifiable information such as name, address, and phone numbers of grant applicant's point of contact and RCPT members. The PII collected is only for the purpose of FEMA contacting grant applicants, grantees, and RCPTs regarding RCPGP grant funding, reporting, and planning related matters. Grant applicants submit RCPGP grant information using the Department of Health and Human Services (HHS) Grants.gov website.

### 2. Project or Program status

Existing

<b>Date first developed:</b>	<b>September 1, 2008</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date last updated:</b>	<b>July 1, 2011</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,



<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 RCPGP collects the following information about grant applicant's POC or representative: Name; Title/Position; Mailing address(es); Email address(es); and Phone number(s).</p> <p>RCPGP may collect the following additional information from RCPT members as part of an applicant's supporting documentation: Name; Title/Position; Physical Address(es); Email address(es); and Phone number(s)</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></p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input checked="" type="checkbox"/> Sharepoint-as-a-Service</p> <p><input type="checkbox"/> Social Media</p>
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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.



	<input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal <sup>2</sup> <input 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 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 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.  N/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.



## 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>	December 23, 2013
<b>PCTS Workflow Number:</b>	1000872

## 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: <a href="#">Click here to enter text.</a>
<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 the FEMA Privacy Office that RCPGP is a privacy sensitive system with coverage required under the DHS/FEMA/PIA – 013 Grant Management Programs PIA and the DHS/FEMA – 004 Grant Management Information Files SORN.</p> <p>RCPGP provides grant funding to ten urban areas and their surrounding regions for catastrophic preparedness planning. Each of the 10 regions has a team (RCPT) consisting of federal, state, and local emergency management professionals and first responders. FEMA administers and manages federal funding to support planning within FEMA’s 10 regions. The PTA has been submitted because FEMA collects information from states and RCPTs seeking RCPGP funding including PII such as name, address, and phone numbers of grant applicant’s point of contact and RCPT members. The PII collected is only for the purpose of FEMA contacting grant applicants, grantees, and RCPTs regarding RCPGP grant funding, reporting, and planning related matters. The RCPTs use SharePoint services hosted at DOE and sponsored by FEMA for collaboration. FEMA does not own or operate the SharePoint site.</p> <p>The DHS/FEMA/PIA Grant Management Programs PIA is required because FEMA is collecting PII from states and RCPTs that is used in order to contact grant applicants, grantees, and the members of the RCPT regarding the RCPGP grant funding, reporting, and planning. The DHS/FEMA – 013 Grant Management PIA allows FEMA to collect PII in order to determine awards for disaster and non-disaster grants for the issuance of awarded funds. This PIA covers RCPGP because the program is collecting PII in support of providing grant funding to applicants, grantees, and RCPTs from each of the 10 regions of the RCPGP and RCPGP is using the information in the same manner as described in the PIA. This program uses SharePoint as a service. However, the DHS/ALL – 037 SharePoint and Collaboration Sites PIA is not required because the existing PIA covers this activity and the activity is consistent as rules outlined in the DHS/FEMA/PIA – 013 Grant Management Programs PIA.</p> <p>The DHS/FEMA – 004 Grant Management Information Files SORN allows FEMA to collect and store PII in order to assist in determining awards for disaster and non-disaster grants, for the issuance of funds, and in order to ensure completeness and accuracy of grants and applications. This SORN is required because FEMA is collecting PII for the purpose of administering federal funding to support the 10 RCPGP regions.</p>	