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 (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, 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 DHSOnline and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.

PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.
Upon receipt, the DHS Privacy Office will review this form
and may request additional information.

SUMMARY INFORMATION

DATE **submitted for review:** August 1, 2009

NAME **of** Project**: FEMA's Homeland Security Grant Program (HSGP)**

Name of Component: Federal Emergency Managment Agency

Name of Project Manager: Paul Belkin

Email for Project Manager: Paul.Belkin@fema.gov

Phone number for Project Manager: 202-786-9771

TYPE **of Project:**

☐ **Information Technology and/or System***

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

☒ **Other: FEMA is seeking OMB clearance for the Homeland Security Grant Program (HSGP).**

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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.

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

One of FEMA's objective is to prepare America for hazards by developing and implementing national programs to enhance the capacity of state and local agencies to respond to incidents through coordinated training, equipment acquisition, technical assistance, and support for Federal, state, and local exercises. FEMA fulfills this mission through a series of grant programs that provide funding to enhance the capacity of state and local jurisdictions to prevent, respond to, and recover from disaster and non-disaster incidents.

The Homeland Security Grant Program (HSGP) is a primary funding mechanism for building and sustaining national preparedness capabilities. HSGP is comprised of four separate grant programs:

- State Homeland Security Program (SHSP)
- Urban Areas Security Initiative (UASI)
- Metropolitan Medical Response System (MMRS)
- Citizen Corps Program (CCP)

Together, these grants fund a range of preparedness activities, including planning, organization, equipment purchase, training, exercises, and management and administration costs.

A combination of the results from risk and effectiveness analyses determine each applicant's allocation. State and local reviewers evaluate applications after risk analyses are applied. FEMA uses the results of both the risk analyses and the peer review to make funding recommendations to the Secretary. Additional details on the HSGP can be found at http://www.fema.gov/government/grant/hsgp/index.shtm.

2. Status of Project:

☐ This is a new development effort.

☒ This is an existing project.

Date first developed: October, 2005

Date last updated: August 1, 2009

FEMA is seeking OMB clearance for the Homeland Security Grant Program (HSGP).

3. Could the project relate in any way to an individual?[1]

☐ No. Please skip ahead to the next question.

☒ Yes. Please provide a general description, below.

The type of information that may be collected and/or retained are the names of organizational Point(s) of Contact, organizational address, organizational email addresses, and additional contact information. Although the collected information contains names of organization employees, the grantee files are NOT retrieved, NOR retrievable by the names of employees BUT by the state agency/grantee name.

4. 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.

[1] Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.

5. 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:

<Please provide the function of the SSN and the legal authority to do so.>

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

HSGP awards are made by organization, not individuals. Only Governor-designated State Administrative Agencies (SAAs) are eligible for the HSGP. HSGP has six standard federal grant forms: Application for Federal Assistance SF-424, Disclosure of Lobbying Activities SF-LLL, Budget Information SF-424A, Assurances SF-424B, Budget Information-Construction Form SF-424C, and Assurances-Construction Programs SF-424D. Consequently, HSGP collects/retains applicant information, including:

- Names of organizational Point(s) of Contact;
- Organizational address;
- Organizational email addresses;
- Organizational telephone and fax number;
- Organizational Investment Justification;
- Employer Identification Number (EIN) and (Dun & Bradstreet) DUNS numbers;
- Type of Submission;
- Type of Application;
- Date Received;
- Applicant Identifier;
- Federal Entity Identifier;
- Federal Award Identifier;
- Date Received by State;
- State Application Identifier;
- Department Name;
- Division Name;

- Name of Federal Agency;
- Catalog of Federal Domestic Assistance (CFDA) Number;
- CFDA Title and;
- Funding Opportunity Number;
- Competition Identification Number; and Areas Affected by Project

7. 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.>

8. Can the system be accessed remotely?

☐ No.

☒ Yes. When remote access is allowed, is the access accomplished by a virtual private network (VPN)?

☒ No. Applicants provide application data upon submitting their proposals to FEMA via grants.gov, which is accessible via Internet.

☐ Yes.

9. Is Personally Identifiable Information[2] physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)

☐ No.

☒ Yes. PII, as it relates to an individual's employment by an eligible grant entity, is transported outside the LAN (via Internet) and transmitted to grants.gov. FEMA accesses grants.gov to download application data, which includes PII, such as an organization's Point of Contact (POC) name, organizational POC's email address, and organizational POC's telephone number .

10. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems[3]?

☒ No

☐ Yes. Please list:

11. Are there regular (ie. periodic, recurring, etc.) data extractions from the system?

☒ No.

☐ Yes. Are these extractions included as part of the Certification and Accreditation[4]?

☐ Yes.

☐ No.

12. 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

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[2] Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

[3] 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.

[4] This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)

Integrity: ☐ Low ☐ Moderate ☐ High ☐ Undefined

Availability: ☐ Low ☐ Moderate ☐ High ☐ Undefined

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PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE **reviewed by the DHS Privacy Office: April 27, 2010**

NAME **of** the DHS Privacy Office Reviewer: **<Please enter name of reviwer.>**

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
- ☒ A PIA is required
  - ☒ System covered by existing PIA: FEMA Grants Management Programs
  - ☐ A new PIA is required.
  - ☐ A PIA Update is required.
- ☒ A SORN is required
  - ☒ System covered by existing SORN: DHS/FEMA-004
  - ☐ A new SORN is required.

DHS PRIVACY OFFICE COMMENTS