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: 703-235-0780

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

PRIVACY THRESHOLD ANALYSIS (PTA)

Summary Information

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| Project or Program Name: | Staffing for Adequate Fire and Emergency Response (SAFER) | | |
| Component: | Federal Emergency Management Agency (FEMA) | Office or Program: | Assistance to Firefighters Grant |
| TAFISMA Name: | AFG-Assistance to Firefighters Grant | TAFISMA Number: | Click here to enter text. |
| Type of Project or Program: | IT System | Project or program status: | Update |

PROJECT OR PROGRAM MANAGER

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Catherine Patterson | | |
| Office: | Assistance to Firefighters Grant | Title: | Branch Chief |
| Phone: | 202-786-9796 | Email: | [Catherine.Patterson@fema.dhs.gov](mailto:Catherine.Patterson@fema.dhs.gov) |

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Click here to enter text. | | |
| Phone: | Click here to enter text. | Email: | Click here to enter text. |

ROUTING INFORMATION

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| Date submitted to Component Privacy Office: | Click here to enter a date. |
| Date submitted to DHS Privacy Office: | Click here to enter a date. |
| Date approved by DHS Privacy Office: | Click here to enter a date. |

Specific PTA Questions

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| 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.* |
| SAFER Grants provide financial assistance directly to fire departments and volunteer firefighter interest organizations in order to help them increase or maintain the number of trained, "front line" firefighters available in their communities. SAFER grant funds are available in two activities: Hiring Firefighters and Recruitment and Retention of Volunteer Firefighters.  The SAFER Grant Program project is a competitive grant opportunity that is administered by the Assistance to Firefighters Program Office. The grant application package was included in the Office of Management and Budget Information Collection Request 1660-0054. The SAFER grant collection has been separated from the AFG collection. This separation was necessary due to the fact that SAFER and AFG are authorized separately, and therefore have separate appropriations and are not contingent upon one another. The purpose of the application is to assess the needs of each individual applicant compared to the other applicants interested in the opportunity. The authority for SAFER is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 et seq.), as amended. This submission is necessary in order for DHS to effectively implement a competitive grant program and meet the fiscal deadlines. The data generated through the grant application process is stored and maintained in the AFG-Assistance to Firefighter Grant IT system, which was de-coupled from the National Emergency Management Information System (NEMIS). This system does not relate to any other grant application system such as Non‐Disaster (ND) Grants. |

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| 1. Project or Program status | | Existing | |
| Date first developed: | November 24, 2003 | Pilot launch date: | Click here to enter a date. |
| Date last updated: | January 5, 2009 | Pilot end date: | Click here to enter a date. |

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| 1. 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[[1]](#footnote-1) |

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| 1. What specific information about individuals could be collected, generated or retained?   *Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.* | |
| The only information collected and retained is the name, title, phone numbers, and email address for the applying organizations Points of Contact (POC). | |
| Does the Project or Program use Social Security Numbers (SSNs)? | No |
| If yes, please provide the legal authority for the collection of SSNs: | Click here to enter text. |
| If yes, please describe the uses of the SSNs within the Project or Program: | Click here to enter text. |

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| 1. Does this system employ any of the following technologies:   *If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.* | Closed Circuit Television (CCTV)  Sharepoint-as-a-Service  Social Media  Mobile Application (or GPS)  Web portal[[2]](#footnote-2)  None of the above |
| 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 next question.  Yes. If a log kept of communication traffic, please answer the following question. |
| If header or payload data[[3]](#footnote-3) is stored in the communication traffic log, please detail the data elements stored. | | |
| Click here to enter text. | | |

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| 1. Does this project or program connect, receive, or share PII with any other DHS programs or systems[[4]](#footnote-4)? | No.  Yes. If yes, please list:  IFMIS |
| 1. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems? | No.  Yes. If yes, please list:  Click here to enter text. |
| Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)? | Updated  Please describe applicable information sharing governance in place.  Click here to enter text. |

PRIVACY THRESHOLD REVIEW

(To be Completed by COMPONENT PRIVACY OFFICE)

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| Component Privacy Office Reviewer: | Click here to enter text. |
| Date submitted to DHS Privacy Office: | Click here to enter a date. |
| Component Privacy Office Recommendation:  *Please include recommendation below, including what new privacy compliance documentation is needed.* | | |
| Click here to enter text. | | |

(To be Completed by the DHS Privacy Office)

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| DHS Privacy Office Reviewer: | Click here to enter text. |
| Date approved by DHS Privacy Office: | Click here to enter a date. |
| PCTS Workflow Number: | Click here to enter text. |

DESIGNATION

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| Privacy Sensitive System: | | Choose an item. If “no” PTA adjudication is complete. |
| Category of System: | | Choose an item.  If “other” is selected, please describe: Click here to enter text. |
| **Determination:**  PTA sufficient at this time.  Privacy compliance documentation determination in progress.  New information sharing arrangement is required.  DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.  Privacy Act Statement required.  Privacy Impact Assessment (PIA) required.  System of Records Notice (SORN) required. | | |
| PIA: | Choose an item.  If covered by existing PIA, please list: Grants Management Programs PIA | |
| SORN: | Choose an item.  If covered by existing SORN, please list: DHS/FEMA 004 Grant Management Information Files | |
| DHS Privacy Office Comments:  *Please describe rationale for privacy compliance determination above.* | | | |
| Click here to enter text. | | | |

1. 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. [↑](#footnote-ref-1)
2. 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.” [↑](#footnote-ref-2)
3. 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. [↑](#footnote-ref-3)
4. 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. [↑](#footnote-ref-4)