



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, on DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Emergency Management Performance Grant Program		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Protection and National Preparedness (PNP)
TAFISMA Name:	Click here to enter text.	TAFISMA Number:	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational

PROJECT OR PROGRAM MANAGER

Name:	Samrawit Aragie		
Office:	Grant Programs Directorate (GPD)	Title:	Program Analyst
Phone:	202.786.9846	Email:	Samrawit.aragie@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

Date submitted to Component Privacy Office:	October 21, 2013
Date submitted to DHS Privacy Office:	November 6, 2013
Date approved by DHS Privacy Office:	November 25, 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 PNP Grant Program Directorate (GPD) manages the Emergency Management Performance Grant (EMPG) Program. Pursuant to the National Flood Insurance Act of 1968, 42 U.S.C. § 4001 et seq.; Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121 et seq.; Earthquake Hazards Reduction Act of 1977, 42 U.S.C. § 7701 et seq.; Reorganization Plan No. 3 of 1978, 5 U.S.C. App.; and, Section 662 of the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), as amended, 6 U.S.C. § 762, the EMPG Program provides financial assistance to State and local governments in support of emergency management activities and in support of national preparedness and response efforts. EMPG funding may be used for a variety of emergency management activities to include personnel costs, planning, training and exercises, equipment procurement, and select renovation and construction activities.

Information related to the EMPG Program is collected from the general public, specifically, State and local organizations requesting federal funds. Collection of EMPG Program information is covered under OMB ICR No. 1660-0126. During the application process, grant applicant's submit the following personally identifiable information for the applicant Point of Contact (POC): points-of-contact (POC) name, title, address, phone number(s), email address, and signatures. Grant applicants enter EMPG information, including the above PII of POCs and representatives into the U.S. Health and Human Services (HHS) Grants.gov system. Additional information supporting the grant application is uploaded and entered into the FEMA Non-Disaster (ND) Grants Management System which consolidates the entire non-disaster grants management lifecycle into a single system. 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.

2. Project or Program status

Existing

Date first developed:	September 1, 2003	Pilot launch date:	Click here to enter a date.
Date last updated:	Click here to enter a date.	Pilot end date:	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 information¹

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



4. What specific information about individuals could be collected, generated or retained? <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i>	
The Emergency Management Performance Grant (EMPG) Program collects the following information about grant applicant's POC and or representative: Name; Title; Mailing address(es); Email address(es); Phone number(s); and Signatures.	
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.

5. Does this system employ any of the following technologies: <i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Sharepoint-as-a-Service <input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal ² <input checked="" type="checkbox"/> None of the above
If this project is a technology/system, does it relate solely to infrastructure?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic,

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.

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."



<i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	please answer the following question.
If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

6. Does this project or program connect, receive, or share PII with any other DHS programs or systems⁴?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: FEMA ND Grant System
7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: HHS Grants.gov System
Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Choose an item. Please describe applicable information sharing governance in place. N/A

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.

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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J. Sykes
Date submitted to DHS Privacy Office:	November 5, 2013
Component Privacy Office Recommendation: <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)

DHS Privacy Office Reviewer:	Jameson Morgan
Date approved by DHS Privacy Office:	November 25, 2013
PCTS Workflow Number:	999708

DESIGNATION

Privacy Sensitive System:	Yes If “no” PTA adjudication is complete.
Category of System:	IT System If “other” is selected, please describe: Click here to enter text.
Determination:	<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 checked="" 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.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/FEMA/PIA-013 - Grant Management Programs
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-004 Grant Management Information



	Files
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with the FEMA Privacy Office's recommendation that the EMPG Program is required to receive coverage under the DHS/FEMA/PIA – 013 Grant Management Programs PIA and DHS/FEMA – 004 Grant Management Information Files SORN. A Privacy Act Statement is also required for the program.</p> <p>This PTA is being submitted as a 3-year renewal. Nothing has changed in EMPG since the last PTA adjudication on 1/26/2010. The purpose of this program is to provide financial assistance to state and local governments in support of emergency management activities and national preparedness and response efforts. Funding provided by EMPG includes personnel costs, planning, training and exercises, equipment procurement, and select renovation and construction activities. Members of the public must provide FEMA with a limited amount of PII in order to receive requested funding. PII received goes into the HHS Grants.gov system. Additional information supporting the grant application is uploaded and entered into the FEMA Non-Disaster (ND) Grants Management System. 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.</p> <p>The DHS/FEMA/PIA – 013 Grant Management Programs PIA is required because this system is collecting PII from members of the public in order to provide funding to individuals applying for FEMA grants. The Grant Management Programs PIA allows DHS/FEMA to collect information in order to determine awards for both disaster and non-disaster grants and for the issuance of awarded funds.</p> <p>Coverage under the DHS/FEMA – 004 Grant Management Information Files SORN is required because the information collected by EMPG is held by DHS and uniquely retrievable. The DHS/FEMA – 004 SORN allows DHS/FEMA to collect information 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 information collected by EMPG is consistent with the purpose, categories of individuals, categories of records, and routine uses of the DHS/FEMA – 004 SORN. A Privacy Act Statement is also required because information collected from members of the public is being stored in a system of records.</p>	