



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:	Individual Assistance Declaration Factors (1660-0009) Rulemaking		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Office of Response & Recovery
TAFISMA Name:	Click here to enter text.	TAFISMA Number:	Click here to enter text.
Type of Project or Program:	Notice of Proposed Rulemaking/Final Rule	Project or program status:	Choose an item.

PROJECT OR PROGRAM MANAGER

Name:	Lisa Dilliplane		
Office:	Click here to enter text.	Title:	Click here to enter text.
Phone:	202.646.3598	Email:	Lisa.Dilliplane@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:	November 20, 2013
Date submitted to DHS Privacy Office:	November 21, 2013
Date approved by DHS Privacy Office:	December 5, 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.

If a State is impacted by an event of a severity and magnitude that is beyond its response capabilities, the State Governor may seek a declaration by the President that a major disaster or emergency exists under sections 401 and 501 of the Stafford Act (42 U.S.C. §§ 5170 and 5190). The request is now submitted through a FEMA form. FEMA evaluates the request and recommends to the President what response action to take. If the request is granted, the State may be eligible to receive assistance under 42 U.S.C. §§ 5170a, 5170b, 5170c; 5172, 5173, and 5174.

FEMA uses FEMA Form 010-0-13 to collect information from the requesting State. The form prompts a State to describe the impact of disaster or emergency when seeking a Presidential declaration. With this, DHS/FEMA is able to effectively process, analyze, and evaluate declaration requests. DHS/FEMA analyzes the State's information submitted in the form to determine what recommendations to make to the President. Based on this information, the President may either grant the request or not. The form contains the Governor's name, state point of contact, incident date, type of incident, description of damages, description of nature and amount of local resources used by state, type of assistance sought, and designated counties and/or tribes within the state to receive assistance. FEMA's Declarations Unit maintains the State's information from the form on an employee's drive. The form is shared with a limited number of employees. Any subsequent use of the information is evaluated in additional, separate Privacy Threshold Analyses. The data is neither retrieved nor retrievable by personally identifiable information.

Section 1109 of The Sandy Recovery Improvement Act of 2013 (SRIA) (Public Law 113-2) requires FEMA, in cooperation with State, local, and Tribal emergency management agencies, to review, update, and revise through rulemaking the factors that FEMA analyzes when reviewing Request for Declaration forms. Congress directed FEMA to review, update, and revise these factors to provide more objective criteria for evaluating the need for assistance to individuals, to clarify the threshold eligibility, and to speed a declaration of a major disaster or emergency under the Stafford Act.

In accordance with this mandate, this rulemaking is proposing to revise the Individual Assistance factors that are currently used by FEMA to make a major disaster recommendation to the President. Specifically, FEMA is proposing to consider the fiscal capacity of a State, a State's resource availability, US Census provided disaster impacted population data points, any impacts to community infrastructure, any uninsured home and personal property losses, information on the number of missing, injured, or deceased individuals due to a disaster, and the disaster related unemployment numbers.

This information will be collected in existing FEMA Form 010-0-13 and will still only include the Governor's point of contact and general office phone number as well as other State specific and disaster specific information of a non-identifiable nature. The information is neither retrieved nor retrievable by PII. Any retrieval would be done by State specific or disaster specific information of a non-identifiable nature.

This rulemaking does not impact FEMA's collection of PII in the disaster declarations process and form.



2. Project or Program status		Choose an item.	
Date first developed:	April 1, 1979	Pilot launch date:	Click here to enter a date.
Date last updated:	April 30, 2012	Pilot end date:	Click here to enter a date.

3. From whom does the Project or Program collect, maintain, use or disseminate information? <i>Please check all that apply.</i>	<input type="checkbox"/> DHS Employees
	<input type="checkbox"/> Contractors working on behalf of DHS
	<input checked="" type="checkbox"/> Members of the public
	<input type="checkbox"/> This program does not collect any personally identifiable information ¹

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>	
Governor's point of contact and general office phone number.	
Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	NA
If yes, please describe the uses of the SSNs within the Project or Program:	NA

5. Does this system employ any of the	<input type="checkbox"/> Closed Circuit Television (CCTV)
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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.



<p>following technologies:</p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<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
<p>If this project is a technology/system, does it relate solely to infrastructure?</p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<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.
<p>If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>Click here to enter text.</p>	

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

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.”

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.



**Homeland
Security**

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@dhs.gov
www.dhs.gov/privacy

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	Click here to enter text.
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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Lane Raffray
Date submitted to DHS Privacy Office:	Click here to enter a date.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Consistent with the adjudication of the April 30, 2012 PTA for the 1660-0009 ICR, FEMA recommends that the PTA be sufficient and that no PIA and no SORN be required at this time.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
Date approved by DHS Privacy Office:	December 5, 2013
PCTS Workflow Number:	1001020

DESIGNATION

Privacy Sensitive System:	No If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	<input checked="" 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 type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required.
PIA:	Choose an item. If covered by existing PIA, please list: Click here to enter text.
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text.



DHS Privacy Office Comments:

Please describe rationale for privacy compliance determination above.

The DHS Privacy Office agrees with the FEMA Privacy Office that this is a not privacy sensitive system. No coverage under a PIA or SORN is required.

This PTA has been submitted because it includes information about a new proposed rulemaking. Specifically, FEMA is proposing to consider the fiscal capacity of a State, a State's resource availability, US Census provided disaster impacted population data points, any impacts to community infrastructure, any uninsured home and personal property losses, information on the number of missing, injured, or deceased individuals due to a disaster, and the disaster related unemployment numbers. The changes to the new proposed rulemaking do not involve any changes to or new collection of PII. There have been no other changes since the last PTA was approved in April 2012.

The form collects the name of a state governor's point of contact and the general office phone number of that individual. The data is neither retrieved nor retrievable by personally identifiable information. This PTA is sufficient because the only information collected is the name of an individual working in their official capacity. As a result, no PIA or SORN is required. If FEMA begins to collect any other PII in this form a new PTA is required.