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

Privacy Threshold Analysis
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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:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.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@hq.dhs.gov, phone: 202-343-1717.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	**Application for Participation in the National Flood Insurance Program – 1660-0004**		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Federal Insurance and Mitigation Administration
Xacta FISMA Name (if applicable):	Click here to enter text.	**Xacta FISMA Number (if applicable):**	Click here to enter text.
Type of Project or Program:	**Form or other Information Collection**	**Project or program status:**	**Existing**
Date first developed:	**October 1, 1968**	**Pilot launch date:**	Click here to enter a date.
Date of last PTA update	**December 13, 2011**	**Pilot end date:**	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	**ATO expiration date (if applicable):**	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	**Patricia Suber**		
Office:	**MT-RR-FM**	**Title:**	Program Specialist
Phone:	**202-646-4149**	**Email:**	Patricia.Suber@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	**Email:**	Click here to enter text.

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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal PTA
The FEMA Federal Insurance and Mitigation Administration (FIMA) administers the National Flood Insurance Program (NFIP) and developed FEMA Form (FF) 086-0-30 *Application for Participation In The National Flood Insurance Program* to collect information from customers. FIMA completed this Privacy Threshold Analysis (PTA) as part of the OMB ICR No. 1660-0004 review and renewal process. Communities complete FF 086-0-30 to enroll into the NFIP. Section 201 of the Flood Disaster Protection Act of 1973 requires all communities that have been identified as flood prone to apply for NFIP one year after flood prone designation. If they do not apply, their community cannot obtain certain types of Federal and Federally-related floodplain financial assistance. In accordance with 44 C.F.R. § 59.2, FEMA and FEMA Write-Your-Own (WYO) Program, participating insurance companies and brokers make available flood insurance protection to property owners located in flood-prone areas. Communities seeking flood insurance for its residents complete FF 086-0-30. Federal regulations under 44 C.F.R. § 59.22 give FEMA the authority to collect information via FF 086-0-30. FEMA and WYO companies collect contact information from local officials applying for rate coverage on behalf of their community. Additionally, FEMA and WYO companies collect pertinent demographic characteristics such as the number of structures in the community and the number of structures in the floodplain. FEMA uses this information to enroll the community in the NFIP, allowing residents in the community to obtain flood insurance.

2. Does this system employ any of the following technologies: *If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.*	☐ Closed Circuit Television (CCTV) ☐ Social Media ☐ Web portal[1] (e.g., SharePoint) ☐ Contact Lists ☒ None of these

3. From whom does the Project or Program collect, maintain, use, or	☐ This program does not collect any personally identifiable information[2]

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[1] Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

[2] 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

![Homeland Security Logo] Homeland Security

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disseminate information? *Please check all that apply.*	☒ Members of the public ☒ DHS employees/contractors (list components): FEMA ☐ Contractors working on behalf of DHS ☐ Employees of other federal agencies

4. What specific information about individuals is collected, generated or retained?
The FF 086-0-30 collects the following information from community officials and representatives: name; address; email address; and phone number. Additionally, the following information is collected from FEMA regional staff members: name; phone number; and regional office.

4(a) Does the project, program, or system retrieve information by personal identifier?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:	Click here to enter text.
4(d) If yes, please describe the uses of the SSNs within the project, program, or system:	Click here to enter text.
4(e) If this project, program, or system is an information 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.

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.

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4(f) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.
Click here to enter text.

5.	**Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems[4]?**	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6.	**Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?**	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6(a)	**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:
7.	**Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?**	☒ No. ☐ Yes. If yes, please list:
8.	**Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?**	☐ No. What steps will be taken to develop and maintain the accounting: ☒ Yes. In what format is the accounting maintained: Audit logs in computer-readable format.

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[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 Xacta.

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9. Is there a FIPS 199 determination?[4]	☐ Unknown. ☒ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High ☐ Undefined Integrity: ☐ Low ☐ Moderate ☐ High ☐ Undefined Availability: ☐ Low ☐ Moderate ☐ High ☐ Undefined

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J Sykes
Date submitted to Component Privacy Office:	Click here to enter a date.
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.*	
FEMA recommends the following coverage: PIA: DHS/FEMA/PIA – 011 National Flood Insurance Program (NFIP) Information Technology Systems (ITS) SORN: Updated DHS/FEMA-003 National Flood Insurance Program Files System of Records	

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[4] FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

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(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	**Jameson A. Morgan**
PCTS Workflow Number:	**1020398**
Date approved by DHS Privacy Office:	June 4, 2014
PTA Expiration Date	June 4, 2017

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Form/Information Collection 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. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. ☐ A Records Schedule may be required. Contact your component Records Officer.
PIA:	**System covered by existing PIA** If covered by existing PIA, please list: DHS/FEMA/PIA – 011 National Flood Insurance Program (NFIP) Information Technology Systems (ITS)
SORN:	System covered by existing SORN If covered by existing SORN, please list: Updated DHS/FEMA-003 National Flood Insurance Program Files System of Records
DHS Privacy Office Comments: *Please describe rationale for privacy compliance determination above.*	

The DHS Privacy Office agrees with the FEMA Privacy Office's recommendation that FIMA App. To Participate in the NIFP is a privacy sensitive system with coverage required under the DHS/FEMA/PIA – 011 NFIP ITS PIA and the DHS/FEMA – 003 NFIP SORN. A Privacy Act Statement is also required per

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the Privacy Act of 1974, Section e(3).

This PTA was submitted as a 3 year renewal PTA. As a result, a review of the program has been performed and it was determined that there were no changes since the last PTA was adjudicated.

This system still receives coverage under the DHS/FEMA/PIA – 011 NFIP ITS PIA which was written as a result of the last PTA, and the DHS/FEMA – 003 NFIP Files SORN which has been republished. No further updates are required at this time.