Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, 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:

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.

## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

| | | | |
|---|---|---|---|
| **Project or Program Name:** | **ICR 1660-0058 Fire Management Assistance Grant Program** | | |
| **Component:** | Federal Emergency Management Agency (FEMA) | **Office or Program:** | ORR |
| **Xacta FISMA Name (if applicable):** | **NA** | **Xacta FISMA Number (if applicable):** | **NA** |
| **Type of Project or Program:** | **Form or other Information Collection** | **Project or program status:** | **Existing** |
| **Date first developed:** | **October 30, 2001** | **Pilot launch date:** | Click here to enter a date. |
| **Date of last PTA update** | **July 15, 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:** | **Allen Wineland** | | |
| **Office:** | **FEMA Recovery Directorate** | **Title:** | FMAG Program Analyst |
| **Phone:** | **202-646-3661** | **Email:** | Allen.Wineland@fema.dhs.gov |

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

| | | | |
|---|---|---|---|
| **Name:** | **NA** | | |
| **Phone:** | **NA** | **Email:** | NA |

## SPECIFIC PTA QUESTIONS

| **1. Reason for submitting the PTA: Renewal PTA** |
|---|
| *Please provide a general description of the project and its purpose in a way a non-technical person could understand. If this is an updated PTA, please describe what changes and/or upgrades that are triggering the update to this PTA. If this is a renewal please state whether or not there were any changes to the project, program, or system since the last version.*<br><br>The Fire Management Assistance Grant Program (FMAGP) collects data in order to provide Fire Management Assistance. The FMAGP is authorized by section 420 of the Stafford Act (42 U.S.C. 5187). The regulations published in 44 CFR Part 204 govern the FMAGP and detail the program procedures, eligibility, and requirements.<br><br>Fire Management Assistance is available to state, local and tribal governments for the mitigation, management, and control of fires on publicly or privately owned forests or grasslands that threaten such destruction as would constitute a major disaster. The Fire Management Assistance declaration process is initiated when a state official submits a request for assistance to the FEMA Regional Director because a "threat of major disaster" exists. The entire process is accomplished on an expedited basis and a FEMA decision is rendered in a matter of hours.<br><br>To begin the FMAGP application process, the Governor of a State or the Governor's Authorized Representative (GAR) submits a request for a FMAGP declaration. The only information collected is the name, work email address, work phone number, and work mailing address of the state employees or officials who complete the forms. FMAGP staff uses the contact information for questions regarding the applicant's grant assistance submission.<br><br>No changes or updates have been made. |

| | |
|---|---|
| **2. Does this system employ any of the following technologies:**<br>*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)<br>☐ Social Media<br>☐ Web portal[1] (e.g., SharePoint)<br>☐ Contact Lists<br>☒ 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] |

[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.

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

| **4. What specific information about individuals is collected, generated or retained?** | |
|---|---|
| *Please provide a specific description of information that is collected, generated, or retained (such as names, addresses, emails, etc.) for each category of individuals.*<br><br>The only information that is collected are the name, work email address, work phone number, and work mailing address of the state employee(s)/official(s) who complete the forms in case they need to be contacted on questions regarding their grant assistance submission. | |
| **4(a) Does the project, program, or system retrieve information by personal identifier?** | ☒ No. Please continue to next question.<br>☐ Yes. If yes, please list all personal identifiers used: |
| **4(b) Does the project, program, or system use Social Security Numbers (SSN)?** | ☒ No.<br>☐ Yes. |
| **4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:** | NA |
| **4(d) If yes, please describe the uses of the SSNs within the project, program, or system:** | NA |
| **4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?**<br><br>*For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?* | ☒ No. Please continue to next question.<br>☐ Yes. If a log kept of communication traffic, please answer the following question. |

[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 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.

| **4(f) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.** |
|---|
| NA |

| | |
|---|---|
| **5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems[4]?** | ☒ No.<br>☐ Yes. If yes, please list:<br>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.<br>☐ Yes. If yes, please list:<br>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.<br>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.<br>☐ 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: N/A this is not an IT system.<br>☐ Yes. In what format is the accounting maintained: |

[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.

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

## PRIVACY THRESHOLD REVIEW

## (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

| | |
|---|---|
| **Component Privacy Office Reviewer:** | **Kathryn Fong** |
| **Date submitted to Component Privacy Office:** | **June 2, 2014** |
| **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.*

No updates have been made. FEMA Privacy recommends this ICR continue to be covered under DHS/FEMA/PIA-013 Grants Management Program and DHS/FEMA-004 Grants Management Information Files SORN.

[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.

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

| | |
|---|---|
| **DHS Privacy Office Reviewer:** | **Jameson A. Morgan** |
| **PCTS Workflow Number:** | **1023918** |
| **Date approved by DHS Privacy Office:** | July 2, 2014 |
| **PTA Expiration Date** | July 2, 2017 |

**DESIGNATION**

| | |
|---|---|
| **Privacy Sensitive System:** | Yes If "no" PTA adjudication is complete. |
| **Category of System:** | Form/Information Collection<br>If "other" is selected, please describe: Click here to enter text. |
| **Determination:** | ☐ PTA sufficient at this time.<br>☐ Privacy compliance documentation determination in progress.<br>☐ New information sharing arrangement is required.<br>☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.<br>☐ Privacy Act Statement required.<br>☒ Privacy Impact Assessment (PIA) required.<br>☒ System of Records Notice (SORN) required.<br>☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.<br>☐ A Records Schedule may be required. Contact your component Records Officer. |
| **PIA:** | **System covered by existing PIA**<br>If covered by existing PIA, please list: DHS/FEMA/PIA – 013 **DHS/FEMA PIA- Grant Management Programs** |
| **SORN:** | System covered by existing SORN<br>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.*

The DHS Privacy Office agrees with the FEMA Privacy Office that FMAGP is privacy sensitive system with coverage required under the DHS/FEMA/PIA – 013 Grant Management Programs PIA and the DHS/FEMA – 004 Grant Management Information Files SORN.

This PTA was submitted as a renewal PTA. There have not been any changes since the last PTA was adjudicated on 7/17/2012. All privacy documentation will remain in place and continue to cover this system. The 2012 PTA adjudication comments were as follows:

"Fire Management Assistance Grants Program/ proposed rule is covered under an existing PIA DHS/FEMA/PIA-013-Grant Management Programs and SORN DHS/FEMA 004 Grant Management Information Files. The PIA and SORN cover the FEMA's collection of PII in order to administer its grant programs… All of the data elements involved in this collection comply with the existing PIA and SORN."