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:	**Property Acquisition and Relocation for Open Space (OMB Control No. 1660-0103)**		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Federal Insurance and Mitigation Administration (FIMA)
Xacta FISMA Name (if applicable):	**N/A**	**Xacta FISMA Number (if applicable):**	**N/A**
Type of Project or Program:	**Form or other Information Collection**	**Project or program status:**	**Update**
Date first developed:	**February 7, 2008**	**Pilot launch date:**	Click here to enter a date.
Date of last PTA update	**July 5, 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:	**Cecelia Rosenberg**		
Office:	**Risk Reduction/Grants Policy**	**Title:**	Grants Policy Supervisor
Phone:	**202-646-3321**	**Email:**	cece.rosenberg@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 Property Acquisition and Relocation for Open Space program. Pursuant to Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121 through 5207; and the National Flood Insurance Act of 1968, as amended, 42 U.S.C. § 4001 FIMA uses FEMA Form (FF) 086-0-31 *Statement of Voluntary Participation for Acquisition of Property for Purpose of Open Space* as an agreement for the acquisition and use of property by a Sub-grantee of a FEMA Hazard Mitigation Assistance (HMA) Grant Program. FIMA completed this Privacy Threshold Analysis (PTA) as part of the OMB ICR No. 1660-0103 review and renewal process. There have been no changes to the program since the last PTA was approved on July 5, 2011.

HMA Grant Program's sub-grantees are local government agencies that participate in hazard mitigation with their State government agency. HMA Grant Program's Grantees are State government agencies. Property owners can voluntarily sell their property to a sub-grantee, who in turn can request HMG Grant Program for funding for the property. FEMA HMA Grant Programs require all properties acquired with FEMA funds to be deed restricted and maintained as open space in perpetuity. This ensures that no future risks from hazards occur to life or structures on that property, and no future disaster assistance or insurance payments are made as a result of damages to that property. FIMA provides model language for the deed restriction and uses FF 81-112 to document this transaction. FIMA collects name, property address, and signature from property owners and name, title, and signature from a sub-grantee POC to verify voluntary homeowner participation for a specific property. This information is not part of an IT system. It is filed in paper form with the State and FEMA project files.

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.

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

4.	**What specific information about individuals is collected, generated or retained?**

FEMA collects some or all of the following information from HMA Grant Program Subgrantee's POC or Property Owners:
      Name,
      title,
      property address, or
      signature.

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.

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[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.

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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: On an excel spreadsheet.
9.	**Is there a FIPS 199 determination?[4]**	☐ Unknown.

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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.

[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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	☒ 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 Sykes
Date submitted to Component Privacy Office:	Click here to enter a date.
Date submitted to DHS Privacy Office:	August 20, 2014
Component Privacy Office Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
PIA: N/A (Records are not maintained is a IT System) SORN: DHS/FEMA-009 - Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs (March 24, 2014 79 FR 16015)	

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(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	**Jameson A. Morgan**
PCTS Workflow Number:	**1037495**
Date approved by DHS Privacy Office:	August 22, 2014
PTA Expiration Date	August 22, 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:	Choose an item.
	If covered by existing PIA, please list: Click here to enter text.
SORN:	System covered by existing SORN
	If covered by existing SORN, please list: DHS/FEMA-009 - Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs
DHS Privacy Office Comments:
Please describe rationale for privacy compliance determination above.
The DHS Privacy Office agrees with the FEMA Privacy Office that Property Acquisition and Relocation of Open Space is a privacy sensitive system with coverage required under the DHS/FEMA – 009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs SORN. This PTA was submitted as a renewal PTA. There haven't been any changes since the last PTA was

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approved in 2011. This program collects a minimal amount contact PII to facilitate an agreement for the acquisition and use of property by a Sub-grantee of a FEMA Hazard Mitigation Assistance (HMA) Grant Program.

The DHS/ALL – 009 SORN allows FEMA to administer the PA grants program, HMA grants programs, and other disaster grants and disaster loan programs to mitigate and recover from emergencies and disasters and to assess the customer satisfaction of FEMA public assistance applicants while allowing FEMA to prevent the duplication of benefits and recoup improper payment.

A PIA is not required at this time per the E-Government Act of 2002 or DHS policies and guidance.