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

Privacy Threshold Analysis
Version number: 01-2014
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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:	**Write-Your-Own (WYO) Program**		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Federal Insurance and Mitigation Administration (FIMA)
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, 1986**	**Pilot launch date:**	Click here to enter a date.
Date of last PTA update	Click here to enter a date.	**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:	**Susan Bernstein**		
Office:	**FIMA**	**Title:**	Branch Chief
Phone:	**202-212-2113**	**Email:**	Susan.Bernstein@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: New PTA
This is a new PTA for the National Flood Insurance Program (NFIP) Write Your Own (WYO) Program. The Federal Emergency Management Agency (FEMA) completes this PTA as part of the Office of Management and Budget's (OMB) Information Collection Request (ICR) renewal process, which is part of OMB ICR No. 1660-0020.
FEMA and the NFIP work with individual private sector insurance companies that are licensed to engage in the business of property insurance to sell flood insurance to the public using their customary business practices. To ensure that policyholders' monies are accounted for and appropriately expended, FIMA implemented a Financial Control Plan (FCP) under FEMA's regulation at 44 C.F.R. § 62.23(f) and Appendix B to Part 62. This plan requires that each WYO Company submit financial data on a monthly basis into the NFIP Bureau and Statistical Agent (BSA) and to the FEMA Office of the Chief Financial Officer monthly. The monthly submission includes financial statement exhibits containing all of their financial activities for each month.
The NFIP provides the WYO Companies with an Excel software application to complete and return with their financial data. The WYO representative who completes the Excel-based form provides FEMA their name and contact telephone number along with aggregate financial information such as the total dollar amount of claims paid out to NFIP policyholders. Information that is provided as part of this collection may be included in the FEMA National Flood Insurance Program (NFIP) Information Technology Systems (ITS) which has privacy compliance coverage under the DHS/FEMA/PIA – 11 NFIPS ITS Privacy Impact Assessment (PIA) and the DHS/FEMA – 003 NFIP Files System of Records Notice (SORN).

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 the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial

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

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

WYO company's representatives provide FEMA their name and phone number for correspondence purposes.

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.
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.	

harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

[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.

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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: FEMA Office of the Chief Financial Officer (OCFO).
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/agencies 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: FEMA's Disclosure Office tracks all disclosures of information submitted through the DHS/FEMA FOIA and PA request process.
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

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[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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	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:	February 23, 2015

Component Privacy Office Recommendation:
Please include recommendation below, including what new privacy compliance documentation is needed.
The FEMA Privacy Office recommends the following coverage: PIA: DHS/FEMA/PIA – 011 National Flood Insurance Program (NFIP) Information Technology Systems (ITS) SORN: N/A.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
PCTS Workflow Number:	**1068683**
Date approved by DHS Privacy Office:	February 24, 2015
PTA Expiration Date	February 24, 2018

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.

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☐ 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 – 11 National Flood Insurance Program (NFIP) Information Technology Systems (ITS)
SORN:	Choose an item.
	If covered by existing SORN, please list:

DHS Privacy Office Comments:
Please describe rationale for privacy compliance determination above.

The WYO Program (OMB ICR 1660-0020) is a privacy sensitive system that collects minimal PII from insurance companies and insurance brokers' representatives that participate in the WYO program. In accordance with the E-Government Act this project requires a PIA and is covered under the DHS/FEMA/PIA – 011 National Flood Insurance Program Information Technology Systems (NFIP ITS) PIA. This project retrieves records by insurance company or insurance broker information and does not retrieve information by PII. In accordance with the Privacy Act, this project is not a system of records and does not require a SORN.