



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:	Special Flood Hazard Determination Form		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Federal Insurance 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:	Modification
Date first developed:	1994	Pilot launch date:	
Date of last PTA update	October 25, 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:	Susan Bernstein		
Office:	FIMA RID	Title:	Program Specialist
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.



SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal PTA	
<p>FEMA completes this PTA as part of the Paperwork Reduction Act (PRA) information collection renewal and update process. FEMA Form (FF) 086-0-32 “Special Hazard Determination Form” is included in the Office of Management and Budget (OMB) Information Collection Resource (ICR) No. 1660-0040. The form is being updated with clearer language to help the user better understand how to fill out the form. There are no changes to the type or amount of information being collected since the previous PTA for this form was approved by DHS on October 25, 2011.</p> <p>The FEMA FIMA developed FF 086-0-32 in compliance with the National Flood Insurance Reform Act (NFIRA) requirement that a Standard Flood Hazard Determination form be used by regulated lending institutions, federal agency lenders, the Federal National Mortgage Association, the Federal Home Loan Mortgage Corporation, and the Government National Mortgage Association. Federally regulated lending institutions and organizations must use FF 086-0-32 for the purpose of determining whether flood insurance is required and available when making, increasing, extending, renewing or purchasing each loan for property. FF 086-0-32 is required for all such loans in the United States and includes the property address for the loan collateral.</p> <p>FEMA does not collect the copies of the completed form or information submitted on the form as part of its normal business process. FEMA is responsible for developing and updating the form used by lenders. Lenders are not regulated by FEMA.</p>	

<p>2. Does this system employ any of the following technologies:</p> <p><i>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.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Web portal¹ (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input checked="" type="checkbox"/> None of these</p>
<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</p> <p><i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> This program does not collect any personally identifiable information²</p> <p><input type="checkbox"/> Members of the public</p>

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



	<input type="checkbox"/> DHS employees/contractors (list components): <input type="checkbox"/> Contractors working on behalf of DHS <input type="checkbox"/> Employees of other federal agencies
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<p>4. What specific information about individuals is collected, generated or retained? The form is required for all federally backed loans in the United States and lists a property address for the loan collateral so that address can be reviewed for flood risk. The lender/user has this information as part of the loan and enters it on the form. FEMA does not collect the information; but, we are responsible for developing and updating the form.</p>	
<p>The following information is requested on FF 086-0-32: Name/lender identification number; Addresses (physical or mailing) or physical description of an address; and Telephone Number</p> <p>This information is maintained and owned by the lending institution. FEMA/FIMA does not collect or maintain the information for its normal administration of the NFIP.</p>	
<p>4(a) Does the project, program, or system retrieve information by personal identifier?</p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<p>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<p>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</p>	<p>Click here to enter text.</p>
<p>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>Click here to enter text.</p>
<p>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <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>4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	

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



Click here to enter text.

<p>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</p>	<p>Choose an item. Please describe applicable information sharing governance in place:</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: FEMA is only responsible for form development and updates and do not collect information or account for completed forms. Lenders use the form. <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input checked="" type="checkbox"/> Unknown. <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality:</p>

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.



Privacy Threshold Analysis
Version number: 01-2014

	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
	Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
	Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J. Sykes
Date submitted to Component Privacy Office:	October 1, 2014
Date submitted to DHS Privacy Office:	November 25, 2014
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
The FEMA Privacy Office recommends that this collect not be considered and privacy sensitive system as the form is not used by FEMA but is a tool created by FEMA to standardize lending institution and other stakeholders' collection of information as part of the NFIP.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
PCTS Workflow Number:	1054649
Date approved by DHS Privacy Office:	November 25, 2014
PTA Expiration Date	November 25, 2017

DESIGNATION

Privacy Sensitive System:	No
Category of System:	Form/Information Collection
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. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. <input type="checkbox"/> 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:	Choose an item. If covered by existing SORN, please list: Click here to enter text.
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
It is agreed that this is not s privacy sensitive system. FEMA does not collect, use, or maintain either completed forms or any information provided to lenders and other stakeholders when completing the form.	