



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
703-235-0780, pia@dhs.gov  
www.dhs.gov/privacy

**Privacy Threshold Analysis**  
**Version date: June 10<sup>th</sup>, 2009**

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## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**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:

Rebecca J. Richards  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, 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](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.  
Upon receipt, the DHS Privacy Office will review this form  
and may request additional information.

### SUMMARY INFORMATION

**DATE submitted for review: November 13, 2013**

**NAME of Project: FloodSmart Websites**

**Name of Component: Federal Emergency Management Agency**

**Name of Project Manager: Mary Jo Vrem**

**Email for Project Manager: MaryJo.Vrem@fema.dhs.gov**

**Phone number for Project Manger: 202-212-4727**

**TYPE of Project:**

**Information Technology and/or System\***

**A Notice of Proposed Rule Making or a Final Rule.**

**Other: <Please describe the type of project including paper based Privacy Act system of records.>**

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\* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•“Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•“Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



## SPECIFIC QUESTIONS

### 1. Describe the project and its purpose:

FEMA's National Flood Insurance Program (NFIP) (42 USC Chapter 50) operates a marketing and advertising program called FloodSmart to increase awareness of flood risk and to encourage homeowners, renters, condominium owners, and business owners to purchase federally-backed flood insurance. FloodSmart is responsible for two websites that support flood insurance marketing and advertising: The consumer-facing floodsmart.gov and the insurance industry oriented agents.floodsmart.gov. The websites collect personally identifiable information (PII) from both the general public that is interested in flood insurance and by insurance agents that wish to be contacted by the general public regarding the NFIP respectively. The PII collected is limited to basic contact-related information.

The Floodsmart websites play a lead role in connecting the general public with flood insurance agents and providing information regarding the FEMA NFIP and beginning the process of purchasing flood insurance policies.

FloodSmart.gov provides general information about flood risk and flood insurance, including a vast array of resources, educational information, risk assessment tools, and a means through which the consumer can locate an insurance agent in their area that sell flood insurance. Visitors to this site can request additional flood insurance information or have an agent contact them for the purchase of flood insurance through the FEMA NFIP. Additionally, visitors to this site can request a risk assessment of a property by providing FEMA with a property address. Floodsmart uses information from the FEMA Mapping Information Platform (MIP) to provide flood risk mapping information as it relates to the property. FEMA MIP is currently covered by the DHS/FEMA/PIA-028 - Mapping Information Platform (MIP) Privacy Impact Assessment and its associated System of Records Notice.

The general Agents.FloodSmart.gov is designed for the insurance agent to learn about selling flood insurance, gaining access to training, tools and resources, as well as the capability to register for the referral program. Agents can provide user account creation information (first/last name, agency address, agency phone number) to register on Agents.FloodSmart.gov. Once registered, an agent can access their registration profile and update contact information.

The production environment and backend database for both websites is owned by FEMA and will be hosted at a NFIP Virtualized Information Technology Systems (NVITS) server site as of December 15, 2013

Both websites are designed, developed, and maintained by Blue Water Media (BWM). BWM's development environment maintains a copy of the primary FloodSmart database. BWM's FloodSmart Development Environment is hosted at a



secured facility in Greenbelt, MD on a secured, dedicated system for the following web management usage:

- Content and functionality changes to FloodSmart.gov files;
- Content and functionality changes to Agents.FloodSmart.gov files; and
- Database imports for refreshing the development environment.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed: June 2, 2004

Date last updated: November 15, 2012

Expected "Go Live" date at new NFIP ITS hosting site is 12/15/13).

**3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?**

Yes.

No. Please describe the information source and collection method.

<Please describe the information source and collection method.>

**4. Does the individual have the option to decline submitting the information collected?**

Yes.

No.

**5. Is the information collected limited to non-sensitive personally identifiable information? *An example of sensitive personally identifiable information is the social security number or date of birth.***

Yes.

No.

**6. What information about individuals could be collected, generated or retained?**

The following information may be voluntarily collected from or generated on the general public and flood insurance agents to facilitate contact within the FEMA NFIP



and for system registration: Name, Address(es), Phone number, Email address, and Geocode (Latitude and Longitude).

7. **Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

8. **With whom could the information be shared?**

This information is shared with the FloodSmart team and FEMA stakeholders for reporting purposes.

9. **Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

10. **Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**

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 the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: December 12, 2013

NAME of the DHS Privacy Office Reviewer: Jameson Morgan

### DESIGNATION

This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System

#### Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other:

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required

System covered by existing PIA: DHS/ALL/PIA-006 [Department of Homeland Security General Contact Lists](#)

- A new PIA is required.
- A PIA Update is required.

A SORN is required

System covered by existing SORN: [DHS/ALL-002 - Department of Homeland Security \(DHS\) Mailing and Other Lists System](#); [DHS/ALL-004 - General Information Technology Access Account Records System \(GITAARS\)](#)

A new SORN is required.



## DHS PRIVACY OFFICE COMMENTS

The DHS Privacy Office approves this PTA with coverage under the DHS/ALL/PIA – 006 DHS General Contact Lists PIA; the DHS/ALL – 002 HDS Mailing and Other Lists System SORN; and the DHS/ALL – 004 DHS General Information Technology Access Account Records System (GITAARS) SORN.

This system enables member of public to educate themselves about federal flood insurance programs and contact insurance agents who provide coverage for such insurance. This system provides members of the public with the ability to contact insurance providers who voluntarily participate in this system. Information collection from all parties is voluntary. Information is only collected for the purpose of account creation and connecting the two participating parties. FEMA must collect limited PII order to provide this service to members of the public and insurance agents.

The DHS/ALL/PIA – 006 Contact Lists PIA provides coverage to Floodsmart because it allows DHS/FEMA to collect a minimal amount of information in order to distribute information and perform various other administrative tasks, such as those associated with the Floodsmart system.

The DHS/ALL – 002 Mailing and Other Lists SORN provides coverage to the contact information provided by members of the public and agents providing insurance coverage in this system. This system allows DHS to collect and maintain information on maintaining lists of individuals who attend meetings and for other purposes for which mailing or contact lists may be created. This SORN provides coverage because all parties involved are providing contact information in order to be connected with the other interested party.

The DHS/ALL – 004 GITAARS SORN provides coverage to the general information submitted by insurance agents in order to create accounts to access the system and get in contact with interested individuals.