



## **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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	<b>Controlled Equipment Request-Information Collection</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Grant Programs Directorate
<b>Xacta FISMA Name (if applicable):</b>	N/A	<b>Xacta FISMA Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Development</b>
<b>Date first developed:</b>	November 23, 2015	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update: N/A</b>	N/A	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable):N/A</b>	N/A	<b>ATO expiration date (if applicable): N/A</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Abigail Bordeaux		
<b>Office:</b>	GPD-Office of the Assistant Administrator	<b>Title:</b>	Management & Program Analyst
<b>Phone:</b>	202-733-0140	<b>Email:</b>	Abigail.bordeaux@fema.dhs.gov

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

<b>Name:</b>	N/A		
<b>Phone:</b>	N/A	<b>Email:</b>	N/A



## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: New PTA

FEMA form 087-0-0-1 “Controlled Equipment Request” was developed to collect required information as part of the implementation of [Executive Order \(EO\) 13688: Federal Support for Local Law Enforcement Equipment Acquisition](#), issued January 16, 2015, which established a *Prohibited Equipment List* and a *Controlled Equipment List Report* for the purpose of identifying actions that can improve federal support for the appropriate use, acquisition, and transfer of controlled equipment by state, local, tribal, territorial, and private grant recipients. One of the requirements of the report is to collect information on the grant recipient, their policies, training, record keeping, etc.

FEMA form 087-0-0-1 includes only fields required to comply with the recommendations (which were accepted by the President). The fillable nature of the form reduces the amount of time and effort required for grant recipients to complete it. The information will be collected from grant recipients (either state administrative agencies or other direct grant recipients).

FEMA GPD receives grant applicant information via the Non-Disaster Grants (ND-Grants) system, which is a GPD system for managing applications and awards ([this does not apply to Assistance to Firefighters Grants](#)). For forms that are submitted outside of the defined application period or for Assistance to Firefighters Grants, the grant recipient will send the form to the respective program analyst via email. Regardless of the timing of the submissions or which way the information was received, 100% of submissions will be made electronically. Care has been taken to reduce the required information to the absolute minimum.

As part of implementing the recommendations report, FEMA Grants Program Directorate (GPD) will conduct compliance reviews, consistent with each grant program’s statutory or other authorities. The focus of these reviews will be conducted as part of routine advanced monitoring as appropriate by the GPD. GPD may provide part or all of the information collected to the Federal Interagency Law Enforcement Equipment Working Group (LEEWG) for those purposes. The LEEWG consist of many agencies across the federal government, as well as other state and local agencies/organizations. For further information on the LEEWG, the following link has been provided: <https://www.whitehouse.gov/the-press-office/2015/01/16/executive-order-federal-support-local-law-enforcement-equipment-acquisit>.

The LEEWG is required to track controlled equipment inventory and sanctions. On occasion, grant applicants will apply for funding to purchase the same equipment from multiple federal agencies. The working group database, once implemented, will allow federal agencies to check for redundant applications or existing sanctions prior to awarding funds for controlled equipment. GPD does not and will not maintain a database. Until a system is in place for the working group to accept the information, the information on the form will be kept in electronic



format in the ND-Grants system with the official grant file; and information is only retrieved by organization/state/grant file name.

Grant files are maintained/stored in the ND-Grants system, and are retained there for 6 years after cut off. After then, as electronic temporary records they will be destroyed via deletion.

<p><b>2. Does this system employ any of the following technologies:</b></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 portal<sup>1</sup> (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input checked="" type="checkbox"/> None of these</p>
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<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b></p> <p><i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program does not collect any personally identifiable information<sup>2</sup></p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> DHS employees/contractors (list components):</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p> <p><input type="checkbox"/> Employees of other federal agencies</p>
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>
<p>Information about individuals (applicants/recipients/sub-recipients) to be collected:</p>  <p>First/Last name,</p>

<sup>1</sup> 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.

<sup>2</sup> 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.



Business address, Position Title, Organization Name, Business phone number; and Business Email Address.	
<b>4(a) Does the project, program, or system retrieve information by personal identifier?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b>	N/A
<b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	N/A
<b>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b>  <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
<b>4(f) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	
N/A	
<b>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list:  Law Enforcement Equipment Working Group (see section 1)

<sup>3</sup> 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.

<sup>4</sup> 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.



<p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>Law Enforcement Equipment Working Group (see section 1)</p>
<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b></p>	<p>N/A</p> <p>Please describe applicable information sharing governance in place: N/A</p>
<p><b>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?</b></p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p>
<p><b>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?</b></p>	<p><input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p><input checked="" type="checkbox"/> Yes. In what format is the accounting maintained:</p> <p>This system does not collect or maintain SPII or PII to the extent of PII collected is only individuals' names. The additional information referenced is related to the business or organization receiving grants for their programs.</p>
<p><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input type="checkbox"/> Unknown.</p> <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:  <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Integrity:  <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p>

<sup>4</sup> 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.



	Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
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### PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	<b>LaKia Samuel</b>
<b>Date submitted to Component Privacy Office:</b>	<b>December 18, 2015</b>
<b>Date submitted to DHS Privacy Office:</b>	January 11, 2016
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
FEMA form 087-0-0-1 “Controlled Equipment Request” collects minimal contact information for grant recipients to request controlled equipment, and has coverage under the following PIA:  DHS/FEMA/PIA-013 - Grant Management Programs <a href="#">Grant Management Programs, February 19, 2015 (PDF, 20 pages)</a> .  No SORN coverage is required, as no information is retrieved by personal identifier.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Tammi Hines</b>
<b>PCTS Workflow Number:</b>	<b>1117073</b>
<b>Date approved by DHS Privacy Office:</b>	January 13, 2016
<b>PTA Expiration Date</b>	January 13, 2019

### DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If “no” PTA adjudication is complete.
<b>Category of System:</b>	Form/Information Collection If “other” is selected, please describe: <a href="#">Click here to enter text</a> .
<b>Determination:</b>	<input 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 checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input checked="" 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.	
<b>PIA:</b>	<b>System covered by existing PIA</b> If covered by existing PIA, please list: <b>DHS/FEMA/PIA-013 - Grant Management Programs</b>
<b>SORN:</b>	If covered by existing SORN, please list: <b>N/A</b>
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
DHS Privacy agrees with the above recommendation, that FEMA form 087-0-0-1 "Controlled Equipment Request" collects minimal contact information for grant recipients to request controlled equipment, and has the following coverage:  DHS/FEMA/PIA-013 - Grant Management Programs <a href="#">Grant Management Programs, February 19, 2015 (PDF, 20 pages)</a> .  No SORN coverage is required, as information is not retrieved by personal identifier.	