



## **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>Community Disaster Loan Program</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Office of Response and Recovery Public Assistance
<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>Existing</b>
<b>Date first developed:</b>	<b>January 1, 1974</b>	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update</b>	Click here to enter a date.	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	<b>Martha Polanco</b>		
<b>Office:</b>	<b>Public Assistance Division</b>	<b>Title:</b>	Assistant Program Manager
<b>Phone:</b>	<b>202.701.4023</b>	<b>Email:</b>	<a href="mailto:Martha.polanco.2@fema.dhs.gov">Martha.polanco.2@fema.dhs.gov</a>

### 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

<b>1. Reason for submitting the PTA: Choose an item.</b>
The Office of Response and Recovery, Public Assistance Division’s Community Disaster Loan (CDL) Program provides operational funding to help local governments that have incurred a significant loss in revenue, due to a major disaster, that has or will adversely affect their ability to provide essential municipal services. Three years post-disaster, applicants can apply for loan cancellation through submission of the Loan Cancellation Application Package if they can prove they have not fully recovered financially. This PTA will extend the use of the Loan Cancellation Application Package (1660-0082).

<b>2. Does this system employ any of the following technologies:</b> <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>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Social Media <input type="checkbox"/> Web portal <sup>1</sup> (e.g., SharePoint) <input type="checkbox"/> Contact Lists <input checked="" type="checkbox"/> None of these
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<b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> <i>Please check all that apply.</i>	<input type="checkbox"/> This program does not collect any personally identifiable information <sup>2</sup> <input checked="" type="checkbox"/> Members of the public <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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<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.



<b>4. What specific information about individuals is collected, generated or retained?</b>	
The following information is collected on local government's primary and alternate contacts:	
<ul style="list-style-type: none"> <li>• Individuals' name;</li> <li>• Title;</li> <li>• Local government mailing address;</li> <li>• Local government email address;</li> <li>• Telephone numbers; and</li> <li>• Fax numbers.</li> </ul>	
<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 checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
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<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.



	Click here to enter text.
<b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: N/A
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	Choose an item. Please describe applicable information sharing governance in place:
<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>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
<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>	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained:
<b>9. Is there a FIPS 199 determination?<sup>4</sup></b>	<input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <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

<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.



## PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	<b>Kathryn Fong</b>
<b>Date submitted to Component Privacy Office:</b>	<b>January 7, 2016</b>
<b>Date submitted to DHS Privacy Office:</b>	January 29, 2016
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
FEMA Privacy recommends this information collection for the purpose of loan cancellation to be covered under DHS/FEMA/PIA-013 Grant Management Programs and DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs SORN.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Tammi Hines</b>
<b>PCTS Workflow Number:</b>	<b>1118269</b>
<b>Date approved by DHS Privacy Office:</b>	February 1, 2016
<b>PTA Expiration Date</b>	February 1, 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 checked="" 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.	
<b>PIA:</b>	Choose an item. If covered by existing PIA, please list: DHS/FEMA/PIA-013 Grant Management Programs
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs SORN
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>DHS Privacy Office agrees that this information collection can be covered under the DHS/FEMA-013 Grants Management Program and DHS/FEMA-009 Hazards Mitigation, Disaster Public Assistance, and Disaster Loan Programs SORN. This information collection is part of the Public Assistances grants program and is listed as one of the approved forms in the DHS/FEMA-009 Grants Management Program. This PIA covers the PII collection of government POCs applying for grants, and in this case the loan cancellation. Likewise, the DHS/FEMA-009 Hazards Mitigation, Disaster Public Assistance, and Disaster Loan Programs SORN covers the information collected for the purpose of supporting the CDL program and information associated with the cancellation of the loans.</p> <p>No further action is required at this time. If the information extends the collection of PII, a new PTA will be submitted.</p>	