



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:	Assistance to Firefighter Grants Program (AFG) (OMB 1660-0054)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Assistance to Firefighters Grant Programs (AFGP)
Xacta FISMA Name (if applicable):	AFG-Assisted Firefighters Grant	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:	March 29, 2001	Pilot launch date:	March 2, 2002
Date of last PTA update	December 9, 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:	Catherine Patterson		
Office:	Grants Program Directorate	Title:	Branch Chief
Phone:	202-786-9796	Email:	catherine.patterson@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

The Assistance to Firefighters Grant (AFG) Program project is a competitive grant opportunity that is administered by the Assistance to Firefighters Program Office. The grant application package is included in the Office of Management and Budget (OMB) Information Collection Request (ICR) 1660-0054. The purpose of the collection is to assess the needs of each individual applicant compared to the other applicants interested in the opportunity.

The authority for Assistance to Firefighters Grant Program (AFG) is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 et seq.), as amended. This submission is necessary in order for DHS to effectively implement a competitive grant program and meet the fiscal deadlines. The data generated through the grant application process is stored and maintained in the AFG-Assisted Firefighter Grant IT system, which was de-coupled from the National Emergency Management Information System (NEMIS). This system does not relate to any other grant application system such as Non-Disaster (ND) Grants. Applicants are state, county, and municipal organizations/entities in charge of administering firefighting duties.

The type of information gathered in this collection includes basic contact information for a primary and two alternate contacts, organization information, the organization's response area demographics, and a summary of the organization's needs with justification. Additionally, grant applicants submit the following information: First Name, Last Name, Title, Work Phone Number, Home Phone Number, Mobile Phone Number, Email Address, Organization's Employee Identification Number (EIN), Banking Account, and Routing Number.

There have been no changes to the collection since the last version of the PTA. This PTA is being renewed because ICR 1660-0054 has been decoupled from the AFG Systems PTA.

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 portal¹ (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 information²

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,



<p>disseminate information? <i>Please check all that apply.</i></p>	<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
--	---

4. What specific information about individuals is collected, generated or retained?	
<ul style="list-style-type: none"> • First Name • Last Name • Middle Initial • Title • Work Phone • Home Phone • Mobile Number • Fax Number • Email Address • Home Address • Organization Name • Mailing Address • Employee Identification Number (EIN) • Banking Account Number • Routing Number • Data Universal Numbering System (DUNS) Number 	
4(a) Does the project, program, or system retrieve information by personal identifier?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of	Click here to enter text.

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.



SSNs:	
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? <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.
4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:

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.

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.



<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:</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</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> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p>

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Tannaz Haddadi
Date submitted to Component Privacy Office:	September 15, 2014
Date submitted to DHS Privacy Office:	October 2, 2014
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
There have been no changes to the collection since the last version of the PTA. This PTA is being renewed because ICR 1660-0054 has been decoupled from the AFG Systems PTA. FEMA Privacy recommends this ICR continue to be covered under DHS/FEMA/PIA-013 Grants Management Program	

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.



and DHS/FEMA-004 Grants Management Information Files SORN since it contains sensitive personal and financial information.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
PCTS Workflow Number:	1045544
Date approved by DHS Privacy Office:	October 3, 2014
PTA Expiration Date	October 3, 2017

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	Form/Information Collection
Determination:	<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.
PIA:	DHS/FEMA/PIA-013 Grants Management Program
SORN:	DHS/FEMA-004 Grants Management Information Files
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
This ICR collects personal and financial PII from grant applicants under the Assistance to Firefighters Grant program for the purpose of grant evaluation and award.	
This PTA was submitted as a 3 year renewal PTA and because the ICR was de-coupled from the AFG System PTA. As a result, a review of the program has been performed and it was determined that there were no changes since the last PTA was adjudicated.	



**Homeland
Security**

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

Page 8 of 8

This ICR should continue to be covered under DHS/FEMA/PIA-013 Grants Management Program and DHS/FEMA-004 Grants Management Information Files SORN. No further updates are required at this time.