



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:

Rebecca J. Richards
Senior Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@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 DHSCconnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Residential Basement Floodproofing Certification (FEMA Form 086-0-24) – OMB No. 1660-0033		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Federal Insurance and Mitigation Administration (FIMA)
TAFISMA Name:		TAFISMA Number:	
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational

PROJECT OR PROGRAM MANAGER

Name:	Mary Chang		
Office:	Risk Insurance Division	Title:	Insurance Examiner
Phone:	202-212-4712	Email:	Mary.chang@dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:			
Phone:		Email:	

ROUTING INFORMATION

Date submitted to Component Privacy Office:	Click here to enter a date.
Date submitted to DHS Privacy Office:	June 18, 2013
Date approved by DHS Privacy Office:	July 2, 2013



SPECIFIC PTA QUESTIONS

1. Please describe the purpose of the project or program:

Please provide a general description of the project and its purpose in a way a non-technical person could understand.

The Federal Insurance and Mitigation Administration (FIMA) National Flood Insurance Program (NFIP) offers flood insurance to property owners located in communities participating in the NFIP. Title 44 C.F.R. § 60.3(c)(2), requires that all new construction and substantial improvements of residential structures within certain high risk flood areas, have the lowest floor, including the basement, elevated to or above the Base Flood Elevation (BFE) unless an exception is granted. Title 44 C.F.R. § 60.6(a)(7) and 44 C.F.R. § 60.6(b)(1), allow communities to apply for an exception when circumstances present a hardship that would prevent adherence to the BFE elevation requirement. This exception must meet the conditions set forth in 44 C.F.R. § 60.6(c).

FEMA Form 086-0-24 is used to certify that the basement design and methods of construction for residential structures in communities that have been granted an exception by FEMA are in accordance with floodplain management ordinances. A registered professional engineer or architect completes FEMA Form 086-0-24 to certify that the floodproofing conforms to minimum specifications. If the certification shows that the building's floodproofed design elevation is at least 1 foot above the BFE, the residential structure is eligible for lower flood insurance rates.

Information collected and maintained includes the personally identifiable information (PII) of the general public, specifically professional certifiers and property owners. Completed copies of the FF 086-0-24 are maintained by FEMA's NFIP Direct Servicing Agent (DSA) and Write-Your-Own (WYO) companies. WYOs are private insurance companies that sell and service FEMA's Standard Flood Insurance Policy (SFIP) under their own names. Status of the completed FF 086-0-24 is identified in a flood insurance policyholder's record within FEMA's NFIP Information Technology Systems (ITS).

2. Project or Program status

Existing

Date first developed:	October 1, 1968	Pilot launch date:	Click here to enter a date.
Date last updated:	October 12, 2012	Pilot end date:	Click here to enter a date.

3. From whom does the Project or Program collect, maintain, use or disseminate information?

Please check all that apply.

- DHS Employees
- Contractors working on behalf of DHS
- Members of the public
- This program does not collect any personally identifiable information¹

¹ 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



<p>4. What specific information about individuals could be collected, generated or retained? <i>Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.</i></p>	
<p>The following information is associated with OMB No. 1660-0033 and FF 086-0-24:</p> <p><u>Property Owner and Professional Certifiers:</u> Individual's Full Name; Address; Professional Title; Professional License; Telephone Number(s); Company Name; Company Number; Flood-Policy Number; Geographical Locations; Flood Zone Data; Legal Description of Property;</p>	
<p>Does the Project or Program use Social Security Numbers (SSNs)?</p>	<p>No</p>
<p>If yes, please provide the legal authority for the collection of SSNs:</p>	<p>Click here to enter text.</p>
<p>If yes, please describe the uses of the SSNs within the Project or Program:</p>	<p>Click here to enter text.</p>

<p>5. Does this system employ any of the following technologies:</p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Sharepoint-as-a-Service</p> <p><input type="checkbox"/> Social Media</p>
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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"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal ² <input checked="" type="checkbox"/> None of the above
If this project is a 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.
If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

6. Does this project or program 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:
7. Does this project or program 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:
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.

² Informational and collaboration-based portals in operation at DHS and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or who seek to gain access to the portal “potential members.”

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 TAFISMA.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J. Sykes
Date submitted to DHS Privacy Office:	Click here to enter a date.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: DHS/FEMA/PIA-011 - National Flood Insurance Program (NFIP) Information Technology System (ITS), October 12, 2012	
SORN: DHS/FEMA-003 - National Flood Insurance Program Files (Dec. 19, 2008 73 Fed. Reg. 77747) – This SORN is currently being consolidated with other FEMA SORNS and updated with additional categories of records, categories of individuals, and routine uses.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Dayo Simms
Date approved by DHS Privacy Office:	July 2, 2013
PCTS Workflow Number:	984080

DESIGNATION

Privacy Sensitive System:	Yes If “no” PTA adjudication is complete.
Category of System:	Other If “other” is selected, please describe: Form
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.
PIA:	System covered by existing PIA



	If covered by existing PIA, please list: National Flood Insurance Program Information Technology System October 12, 2012 (PDF, 23 pages-211.26 KB)
SORN:	SORN update is required. If covered by existing SORN, please list: DHS/FEMA-003 - National Flood Insurance Program Files December 19, 2008 73 FR 77747
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
PRIV agrees that the Residential Basement Flood Proofing Certification Form is privacy sensitive, as it collects information from members of the public who seek reduced flood insurance rates through FEMA's NFIP program. The NFIP IT System PIA covers this collection of information, and the DHS/FEMA-003 SORN covers the collection of some of this information. In the revision of this SORN, FEMA should more clearly break out the data elements collected and the categories of individuals to ensure that the SORN explicitly calls out the individuals collected in its forms. For example, this PTA/Form mentions professional certifiers, but currently the SORN refers to certified flood adjusters, insurance companies, agents, and property owners. The SORN should include certifiers in its category of individuals and also include professional qualifications in the categories of records section.	