



## **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>	Non Disaster (ND) Grants System		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Grant Programs Directorate (GPD)
<b>Xacta FISMA Name (if applicable):</b>	Non Disaster Grants	<b>Xacta FISMA Number (if applicable):</b>	FEM – 03647 MAJ - 03647
<b>Type of Project or Program:</b>	IT System	<b>Project or program status:</b>	Operational
<b>Date first developed:</b>	August 8, 2008	<b>Pilot launch date:</b>	April 4, 2011
<b>Date of last PTA update</b>	May 17, 2012	<b>Pilot end date:</b>	April 4, 2011
<b>ATO Status (if applicable)</b>	Complete	<b>ATO expiration date (if applicable):</b>	July 09, 2015

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Charles Seong		
<b>Office:</b>	Systems and Business Support Branch / Program Support Division / Grant Programs Directorate	<b>Title:</b>	Program Manager
<b>Phone:</b>	202-786-9539	<b>Email:</b>	charles.seong@fema.dhs.com

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

<b>Name:</b>	David H. Thurman		
<b>Phone:</b>	202-786-9606	<b>Email:</b>	david.thurman@associates.dhs.fema.gov



## SPECIFIC PTA QUESTIONS

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

The Non-Disaster Grant Management System (ND Grants) is a web-based system intended to provide the Federal Emergency Management Agency (FEMA) and its stakeholders with a system that supports the grants management lifecycle.

ND Grants includes:

- Administrative Organization Modules
- Application Submission
- Grants.gov Interface
- Award Package Creation and Review

External Organization Management and Task Assignment Services

ND Grants has interfaces to both FEMA and non-FEMA systems. The interfaces include the FEMA Service Oriented Architecture Generic Support System (SOA GSS) which provides business process (BPM) and business rule management (BRM) as a service to the ND Grants application, the FEMA Generic Financial Interface (GFI) which provides an intermediary to the Integrated Financial Management Information System (IFMIS) FEMAs core accounting system, FEMAs Integrated Security Authentication and Access Control system (ISAAC) which provides user authentication and role management as a service to the ND Grants Application, and The Department of Health and Human Services (HHS)'s Grants.gov web application which provides Funding Opportunity advertisement and application services. PII information flows from Grants.gov to ND Grants, and the remaining required data elements are updated by grantees in ND Grants.

This iteration of ND Grants, ND Grants 3.0, utilizes two middleware products: Business Process Manager (BPM) and Operational Decision Manager (ODM), which replace the need for custom code within the application for workflow and business rules, respectively. Both BPM and ODM are hosted on FEMA's Service Oriented Architecture (SOA).

### 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 portal<sup>1</sup> (e.g., SharePoint)
- Contact Lists
- None of these

<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.



<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> <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 is collected from States, Local Government agencies, Port Authorities, Transit Authorities, Non-profit organizations and private companies to determine activity eligibility for funding under FEMA grant programs. This information includes basic public information about the agency or organization, including the name of the point of contact for the application, work address, work phone and fax numbers, cell phone number and work email address. Information for grant processing also includes the organizations' financial information such as bank account numbers and routing numbers as well as information about the activity or activities proposed to be completed under the requested grant.</p> <ul style="list-style-type: none"> <li>• <b>Name of Organization's Designated Point of Contact (POC);</b></li> <li>• <b>POC Title;</b></li> <li>• <b>POC's office mailing address;</b></li> <li>• <b>POC's office phone number;</b></li> <li>• <b>POC's office cellphone number;</b></li> <li>• <b>POC's office fax number;</b></li> <li>• <b>POC's work e-mail address;</b></li> <li>• <b>Organization Name;</b></li> </ul>	
<p><b>4(a) Does the project, program, or system retrieve information by personal identifier?</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p>
<p><b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.</p>
<p><b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b></p>	<p>NA</p>

<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.



## Privacy Threshold Analysis

Version number: 01-2014

Page 5 of 8

<b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	NA
<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>	
NA	

<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: <a href="#">Click here to enter text.</a>
<b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: HHS's Grants.gov
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	Yes, MOU with HHS is through DHS.
<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</b>	<input checked="" type="checkbox"/> No. What steps will be taken to develop and

<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>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>maintain the accounting:</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input type="checkbox"/> Unknown.</p> <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:</p> <p><input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Integrity:</p> <p><input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Availability:</p> <p><input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High <input type="checkbox"/> Undefined</p>

### PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	Lane Raffray
<b>Date submitted to Component Privacy Office:</b>	February 25, 2015
<b>Date submitted to DHS Privacy Office:</b>	March 11, 2015
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: DHS/FEMA/PIA-013 Grant Management Programs	
SORN: DHS/FEMA-004 Non-Disaster Grant Management Information Files (March 13, 2015; 80 FR 13404).	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<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.



<b>DHS Privacy Office Reviewer:</b>	Eric M. Leckey
<b>PCTS Workflow Number:</b>	1070736
<b>Date approved by DHS Privacy Office:</b>	March 18, 2015
<b>PTA Expiration Date</b>	March 18, 2018

### DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If “no” PTA adjudication is complete.
<b>Category of System:</b>	IT System 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>	System Covered by an Existing PIA If covered by existing PIA, please list: DHS/FEMA/PIA-013 Grant Management Programs
<b>SORN:</b>	System Covered by an Existing SORN If covered by existing SORN, please list: DHS/FEMA-004 Non-Disaster Grant Management Information Files (March 13, 2015; 80 FR 13404).
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>FEMA’s Non-Disaster Grant Management System (ND Grants) is a web-based system that provides the agency and its stakeholders with a system that supports the grants management lifecycle. ND Grants is a privacy sensitive system because it collects PII from members of the public in the form of contact type information collected from points of contacts for non-disaster grants.</p> <p>ND Grants is covered by the DHS/FEMA/PIA-013 Grant Management Programs PIA and is listed in its Appendix A as a covered system. The recently re-published DHS/FEMA-004 Non-Disaster Grant</p>	



**Homeland  
Security**

Privacy Office  
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**Privacy Threshold Analysis**

**Version number: 01-2014**

*Page 8 of 8*

Management Information Files (March 13, 2015; 80 FR 13404) covers the records maintained in ND Grants. No further action is required for this system at this time.