Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@dhs.gov
www.dhs.gov/privacy

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:	**Hazard Mitigation Grant Program (HMGP)**		
Component:	Federal Emergency Management Agency (FEMA)	**Office or Program:**	Federal Insurance and Mitigation Administration (FIMA)
Xacta FISMA Name (if applicable):	Hazard Mitigation Grant Program (HMGP)	**Xacta FISMA Number (if applicable):**	FEM-06020-MAJ-06020
Type of Project or Program:	IT System	**Project or program status:**	Operational
Date first developed:	August 30, 1998	**Pilot launch date:**	N/A
Date of last PTA update	December 9, 2011	**Pilot end date:**	N/A
ATO Status (if applicable)	Complete	**ATO expiration date (if applicable):**	July 9, 2015

PROJECT OR PROGRAM MANAGER

Name:	Sam Winningham		
Office:	FIMA	**Title:**	HMGP System Owner
Phone:	202-646-3678	**Email:**	Sam.Winningham@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Sador Gebre		
Phone:	202-646-3057	**Email:**	Sador.Gebre@associates.fema.dhs.gov

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal PTA
The Federal Emergency Management Agency's (FEMA) Federal Insurance and Mitigation Administration (FIMA) administers grant programs for states and localities that seek to implement activities and projects in order to reduce or eliminate risk of future damage to life or property. The Hazard Mitigation Grant Program (HMGP) is one such program. The key purpose of HMGP is to ensure that the opportunity to take critical mitigation measures to reduce the risk of loss of life and property from future disasters is not lost during the reconstruction process following a disaster. This PTA is being conducted pursuant to the triennial review requirement. There have been no changes or updates to the system that impact FEMA's collection, use, maintenance, or sharing of personally identifiable information (PII) since the last PTA was approved by the DHS Privacy Office on December 9, 2011. HMGP information is collected and maintained in the HMGP IT system. The IT system collects and stores grant applications for applicants and sub-applicants associated with a Presidential major disaster declaration. Applicants are the states involved in the disaster. Sub-applicants can include state agencies, Indian Tribal governments, local governments or communities, and private non-profit organizations. As part of the application process, applicants/co-applicants provide property and property owner's information as supporting documentation. Applicants/co-applicants submit property owner information, which includes PII, with the consent of the property owner. The application information includes notations and reports of decisions from insurance, disaster, or similar financial aid and/or income from other Federal and State agencies; insurance companies; employer; bank; financial or credit data service; and public or private entities as they relate to payments and/or financial assistance received by individual property owners for property included in the grant application. HMGP shares this information with the FEMA Enterprise Data Warehouse (EDW) for storage and report creation purposes. The FEMA EDW is covered under the DHS/FEMA/PIA-026 – Operational Data Store and Enterprise Data Warehouse Privacy Impact Assessment (PIA).

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[1] (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 information[2]

[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.

disseminate information? *Please check all that apply.*	☒ Members of the public ☒ DHS employees/contractors (list components): ☒ Contractors working on behalf of DHS ☐ Employees of other federal agencies

4. What specific information about individuals is collected, generated or retained?

The PII that may be collected or retained includes:

Applicant/co-applicant (public):

- property owner/co-owner name(s)
- title holder
- damaged property address
- telephone numbers—home, office, cell
- mailing address
- status regarding flood insurance
- National Flood Insurance Program (NFIP) policy number
- insurance policy provider for the property proposed to be mitigated with FEMA funds
- signature
- Governor's authorized representative name and signature
- grant applicant organization point of contact (POC)— name, organization, office phone number, office mailing address, and email address

FEMA employees or contractors: Full name

4(a) Does the project, program, or system retrieve information by personal identifier?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of	N/A

[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, 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:	N/A
4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? *For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?*	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.
4(f) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	
N/A	

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems[4]?	☐ No. ☒ Yes. If yes, please list: FEMA's Enterprise Date Warehouse (EDW)
6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?	☒ No. ☐ Yes. If yes, please list:
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: N/A
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?	☒ No. ☐ 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.

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?	☒ No. What steps will be taken to develop and maintain the accounting: Request for information goes through the FOIA/PA process managed by the FEMA Disclosure Office. ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☐ Unknown. ☐ No. ☒ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☒ Moderate ☐ High ☐ Undefined Integrity: ☐ Low ☒ Moderate ☐ High ☐ Undefined Availability: ☐ Low ☒ Moderate ☐ High ☐ Undefined

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	**LeVar J. Sykes**
Date submitted to Component Privacy Office:	Click here to enter a date.
Date submitted to DHS Privacy Office:	December 10, 2014

Component Privacy Office Recommendation:
Please include recommendation below, including what new privacy compliance documentation is needed.

The FEMA Privacy Office recommends approval of this PTA for the HMGP System as a Privacy Sensitive System requiring a PIA and SORN. Recommended PIA and SORN coverage are as follows: DHS/FEMA/PIA-025 – Hazard Mitigation Grant Program (HMGP) System PIA and the DHS/FEMA-009 - Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs SORN.

[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.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	**Eric M. Leckey**
PCTS Workflow Number:	**1056876**
Date approved by DHS Privacy Office:	December 11, 2014
PTA Expiration Date	December 11, 2017

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	IT System
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☐ Privacy Act Statement required. ☒ Privacy Impact Assessment (PIA) required. ☒ System of Records Notice (SORN) required. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. ☐ A Records Schedule may be required. Contact your component Records Officer.
PIA:	System covered by existing PIA DHS/FEMA/PIA-025 – Hazard Mitigation Grant Program (HMGP) System PIA
SORN:	System covered by existing SORN DHS/FEMA-009 - Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs SORN.

DHS Privacy Office Comments:
Please describe rationale for privacy compliance determination above.

The purpose of this PTA is to review and document the review of the HMGP System in accordance with the triennial review requirement. This system has not undergone any changes since it was last adjudicated on December 11, 2011. The HMGP System is a Privacy Sensitive System. The system collects business-related PII of State and Local representatives and the PII of property owners. Personal information of property owners; specifically, property information, flood insurance coverage and history is provided to FEMA as part of the HMGP grant application process and is provided to FEMA by grant

applicant(s) following the consent of the property owner. The HMGP system requires a PIA and is covered under the existing DHS/FEMA/PIA-025 – Hazard Mitigation Grant Program (HMGP) System.

Additionally, the HMGP is currently covered by the DHS/FEMA/PIA-025 – Hazard Mitigation Grant Program (HMGP) System.