



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 DHSConnect 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:	Mortgage Portfolio Protection Program (MPPP) (1660-0086)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Federal Insurance and Mitigation Administration
TAFISMA Name:	Click here to enter text.	TAFISMA Number:	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational

PROJECT OR PROGRAM MANAGER

Name:	Susan Bernstein		
Office:	FIMA Risk insurance	Title:	FIMA Risk insurance
Phone:	202-212-2113	Email:	Susan.Bernstein@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

ROUTING INFORMATION

Date submitted to Component Privacy Office:	September 18, 2013
Date submitted to DHS Privacy Office:	September 18, 2013
Date approved by DHS Privacy Office:	November 4, 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) Risk Insurance Division manages the National Flood Insurance Program (NFIP) Mortgage Portfolio Protection Program (MPPP). Purchasing flood insurance is mandatory when the property is located in a high flood risk area in communities that are participating in the NFIP and if there is a federally related loan for a home or business. The MPPP is an option that participating companies can use to ensure that mortgage loan portfolios are in compliance with flood insurance purchase requirements if the property owner refuses to buy flood insurance or if a property has gone through foreclosure and is in the custody of a mortgage lender. Insurance companies applying for or renewing their participation in the NFIP Write Your Own (WYO) program (which allows them to sell NFIP flood insurance to property owners) must indicate that they will adhere to the requirements of the MPPP if they are electing to voluntarily participate in the MPPP.

A WYO company will review the Financial Assistance/Subsidy Arrangement, and complete the Notice of Acceptance acknowledgement either agreeing to participate in the MPPP or electing to continue under WYO guidelines. This allows FEMA to maintain a list of companies that are participating in the MPPP and can assure that insurance policies written under the MPPP are done so by appropriate WYO companies. Without the MPPP, many loans will not meet federal requirements and not be maintainable. The MPPP Agreement, Financial Assistance/Subsidy Arrangement, and Notice of Acceptance collects point of contact information from members of the public, specifically, representatives of insurance companies and mortgage lender. WYO company's participation in the MPPP is updated into the NFIP Information Technology System (ITS). The NFIP ITS is currently covered under the DHS/FEMA/PIA – 011 – NFIP ITS Privacy Impact Assessment (PIA). Paper records are stored in accordance with the NFIP Program Files System of Records System of Records Notice (SORN), 73 Fed. Reg. 77,747 (Dec. 19, 2008). The collection associated with this process is covered by OMB-ICR No. 1660-0086.

WYO companies participating in the MPPP must provide a detailed implementation package, known as the MPPP Agreement, to the lending companies who are requesting insurance coverage and the lender must acknowledge receipt.

2. Project or Program status		Update	
Date first developed:	January 1, 1991	Pilot launch date:	Click here to enter a date.
Date last updated:	September 30, 2010	Pilot end date:	Click here to enter a date.

3. From whom does the Project or Program collect, maintain, use or disseminate information? <i>Please check all that apply.</i>	<input type="checkbox"/> DHS Employees
	<input type="checkbox"/> Contractors working on behalf of DHS
	<input checked="" type="checkbox"/> Members of the public
	<input type="checkbox"/> This program does not collect any personally



	identifiable information ¹
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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>	
FEMA collects the following information from WYO companies and Lender/Mortgager representatives: Name, Title, Company Name, and Signature.	
Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	Click here to enter text.
If yes, please describe the uses of the SSNs within the Project or Program:	Click here to enter text.

5. Does this system employ any of the following technologies: <i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Sharepoint-as-a-Service <input type="checkbox"/> Social Media <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?	<input checked="" type="checkbox"/> No. Please continue to next question.

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 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.

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.”



<i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: NFIP ITS
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: Click here to enter text.
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. Click here to enter text.

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:	Click here to enter text.
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>	
FEMA Privacy recommends the following coverage: PIA: DHS/FEMA/PIA-011 - National Flood Insurance Program (NFIP) Information Technology Systems (ITS) SORN: DHS/FEMA-003 - National Flood Insurance Program Files December 19, 2008 73 FR 77747	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
Date approved by DHS Privacy Office:	November 4, 2013
PCTS Workflow Number:	995578

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	IT System If "other" is selected, please describe: Click here to enter text.
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: DHS/FEMA/PIA - 011 National Flood Insurance



	Program Information Technology System October 12, 2012
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-003 - National Flood Insurance Program Files
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with the FEMA Privacy Office’s recommendation that MPPP is a privacy sensitive system with coverage under the DHS/FEMA/PIA – 011 NFIP ITS PIA and the DHS/FEMA – 003 NFIP Files SORN.</p> <p>MPPP collects limited, general, contact information from members of the public, specifically, representatives of insurance companies, mortgage lenders, and WYO companies in order to ensure that mortgage loan portfolios are in compliance with flood insurance purchase requirements.</p> <p>The DHS/FEMA/PIA – 011 NFIP ITS PIA processes flood insurance policies and claims, specifically, policies and claims from the FEMA Direct Servicing Agent (DSA) contractor on behalf of the NFIP and by Write Your Own Companies (WYO) that sell and service flood insurance policies. The information collected in MPPP is sent to NFIP ITS which is covered by the DHS/FEMA/PIA- 011 NFIP ITS PIA.</p> <p>The DHS/FEMA – 003 NFIP Files SORN allows for information collection from members of the public in order to manage the NFIP and to provide information on the NFIP to those who inquire. The DHS/FEMA – 003 SORN is required because information is collected by MPPP for this purpose. All information collection by MPPP is consistent with the categories of individuals, categories of records, and routine uses stated in the SORN.</p>	