



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:	Application Forms for Conditional and Final Letters of Map Amendment (LOMA) and Letters of Map Revision (LOMR) Based on Fill; Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps (OMB ICR No. 1660-0015)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Federal Insurance and Mitigation Administration (FIMA)
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational
Date first developed:	Click here to enter a date.	Pilot launch date:	Click here to enter a date.
Date of last PTA update	October 21, 2010	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:	Luis Rodriguez		
Office:	FEMA/FIMA/RAD	Title:	Branch Chief
Phone:	202.646.4064	Email:	Luis.rodriquez3@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
<p>This FEMA PTA is part of the Office of Management and Budget (OMB) Information Collection Resource (ICR) renewal process for OMB ICR No 1660-0015, Application Forms for Conditional and Final Letters of Map Amendment and Letters of Map Revision Based on Fill; Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program Maps. There have been no changes to the collection since the last PTA was approved by DHS on October 21, 2010.</p> <p>The Department of Homeland Security’s Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. Pursuant to 44 C.F.R. §§ 65 and 70, if an owner or lessee of property believes their property has been inadvertently mapped in a Special Flood Hazard Area (SFHA), they may submit a request to FEMA for a Letter of Map Amendment (LOMA). The request must include scientific or technical data demonstrating that the property is reasonably safe from flooding and not in a SFHA. This request/ collection of information is part of the OMB ICR No. 1660-0015. The forms related to this collection supplement the general information requirements in the above referenced NFIP regulations and establish an organized and systematic approach to collect data needed to request removal from a SFHA.</p> <p>The FEMA Mapping Information Platform (MIP) is the Information Technology (IT) system of record that maintains LOMA information. The MIP is covered under the DHS/FEMA/PIA-028 - Mapping Information Platform (MIP) Privacy Impact Assessment (PIA).</p>

<p>2. Does this system employ any of the following technologies:</p> <p><i>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.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Web portal¹ (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input checked="" type="checkbox"/> None of these</p>
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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</p>	<p><input type="checkbox"/> This program does not collect any personally identifiable information²</p>
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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, 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 4 of 9

<i>Please check all that apply.</i>	<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
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4. What specific information about individuals is collected, generated or retained?

From “Certifiers” (e.g. a Registered Professional Engineer or Licensed Land Surveyor; or a local government official with authority over a community’s floodplain management activities), FEMA collects:

- Full name (First, Middle, Last)
- Position or title
- Company or community name
- Six-digit NFIP Community Number
- Mailing address
- Telephone number
- Fax number
- Professional license number
- Professional license expiration date
- Signature
- Signature date
- Fill placement and date
- Type of construction
- Elevation data
- Base Flood Elevation (BFE) data

From individuals (e.g. homeowners, investors, and property developers), FEMA collects:

- Full name (First, Middle, Last)
- Mailing address
- Email address



<ul style="list-style-type: none"> • Day-time telephone number • Fax number • Property Address • Fill placement and date • Type of construction • Legal Property Description • Signature or digital signature • Signature date • Credit card information: <ul style="list-style-type: none"> • Credit Card Type • Credit Card Number • Expiration Date • Billing Address • Check information: <ul style="list-style-type: none"> • Bank Account Type • Bank Routing Number • Bank Account number 	
4(a) Does the project, program, or system retrieve information by personal identifier?	<input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Name and Address
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 SSNs:	Click here to enter text.
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?	<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.
<i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	



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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: FEMA MIP
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:
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/agencies who have requested access to their PII?	<input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input checked="" type="checkbox"/> Yes. In what format is the accounting maintained: Request for PII through the MIP system uses system audit logs to track disclosures of PII in addition to the FEMA Disclosure office tracking FOIA/PA requests and responses.

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.



Privacy Threshold Analysis

Version number: 01-2014

Page 7 of 9

<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>
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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	LeVar J. Sykes
Date submitted to Component Privacy Office:	December 12, 2014
Date submitted to DHS Privacy Office:	December 29, 2014
Component Privacy Office Recommendation:	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
<p>FEMA Privacy considers this collection a Privacy Sensitive System with coverage under the DHS/FEMA/PIA-028 - Mapping Information Platform (MIP) PIA and the DHS/FEMA/NFIP/LOMA-1 - National Flood Insurance Program (NFIP); Letter of Map Amendment (LOMA) SORN.</p> <p>While there have been no changes to this specific collection since the last PTA adjudication, FEMA has drafted the FEMA Flood Map Products and Services Records SORN which will update the subject SORN. The purpose of the SORN update is to reflect changes to NFIP's Flood Insurance Rate Maps and to reflect FEMA's collection of credit card information and its sharing of payment information with Treasury.</p>	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
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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.



PCTS Workflow Number:	1058571
Date approved by DHS Privacy Office:	December 30, 2014
PTA Expiration Date	December 30, 2017

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Form/Information Collection 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. <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:	System covered by existing PIA DHS/FEMA/PIA-028 - Mapping Information Platform (MIP) PIA
SORN:	SORN update is required. DHS/FEMA/NFIP/LOMA-1 - National Flood Insurance Program (NFIP); Letter of Map Amendment (LOMA)
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
FEMA's purpose for collecting LOMA related information is to reassess and determine whether a property is within a SFHA. FEMA's determination can impact an individual's need for or cost of federally back flood insurance. This information collection is a privacy sensitive system that collects PII from the public to facilitate correspondence, to identify the property and property owner that will be impacted by the LOMA, and to offset the cost associated with the services needed to evaluate and process a LOMA. It is agreed that FEMA's collection, use, and sharing is covered under the existing DHS/FEMA/PIA-028 - Mapping Information Platform (MIP) PIA.	



**Homeland
Security**

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Privacy Threshold Analysis

Version number: 01-2014

Page 9 of 9

Additionally, this collection will be covered under the FEMA Flood Map Products and Services SORN that will update the DHS/FEMA/NFIP/LOMA-1 - National Flood Insurance Program (NFIP); Letter of Map Amendment (LOMA) SORN.