



PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination by the DHS Privacy Office to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals as determined by the Chief Privacy Officer, pursuant to Section 222 of the Homeland Security Act, and to assess whether there is a need for additional Privacy Compliance Documentation. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used and managed.

Please complete the attached Privacy Threshold Analysis and submit it to your component Privacy Office. After review by your component Privacy Officer the PTA is sent to the Department's Senior Director for Privacy Compliance for action. 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 and assess whether any privacy compliance documentation is required. If compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement, or Computer Matching Agreement (CMA) – the DHS Privacy Office or component Privacy Office will send you a copy of the relevant compliance template to complete and return.



Privacy Threshold Analysis (PTA)

Specialized Template for Information Collections (IC) and Forms

The Forms-PTA is a specialized template for Information Collections and Forms. This specialized PTA must accompany all Information Collections submitted as part of the Paperwork Reduction Act process (any instrument for collection (form, survey, questionnaire, etc.) from ten or more members of the public). Components may use this PTA to assess internal, component-specific forms as well.

Form Number:	FEMA Form 086-0-31 (Previously FEMA Form 81-112)		
Form Title:	Statement of Voluntary Participation for Acquisition of Property for Purpose of Open Space		
Component:	Federal Emergency Management Agency (FEMA)	Office:	Federal Insurance and Mitigation Administration (FIMA) Hazard Mitigation Assistance (HMA) Grants Policy

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Property Acquisition and Relocation for Open Space		
OMB Control Number:	1660-0103	OMB Expiration Date:	January 31, 2018
Collection status:	Revision	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Jennie Orenstein		
Office:	HMA Policy, Tools, and Training	Title:	Branch Chief
Phone:	202-212-4071	Email:	Jennie.Orenstein@fema.dhs.gov



COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Roselyn Brown-Frei		
Office:	HMA Policy, Tools, and Training	Title:	Supervisory Program Analyst
Phone:	202-549-1849	Email:	Roselyn.Brown-Frei@fema.dhs.gov

SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

- a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*
If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.

FEMA’s FIMA submits this new PTA for FEMA Form 086-0-31 (previously FEMA Form 81-112) ***Statement of Voluntary Participation for Acquisition of Property for Purpose of Open Space*** which is part of the Office of Management and Budgets (OMB) Information Collection Request (ICR) Control No. 1660-0103.

Form 086-0-31, as part of ICR 1660-0103, supports the implementation of 44 CFR Part 80 and related property acquisitions by requiring the collection of information from grant applicants (States, the District of Columbia, U. S. Territories and Federally-recognized tribes applying as applicants) and sub-applicants (local governments, state agencies, state-recognized tribes and Alaskan villages applying as sub-applicants) to ensure that property acquisitions are voluntary, and that the acquired property remains open space in perpetuity. FEMA collects copies of the deed restriction language from Applicants as a pre-award requirement for mitigation grants to ensure that the deed to be recorded meets the minimum legal and program requirements.

FEMA Form (FF) 086-0-31, *Statement of Voluntary Participation for Acquisition of Property For Purpose of Open Space* is signed by both property owners and local community officials to enforce the requirement that all acquisitions using FEMA mitigation grants are voluntary, and that no property is acquired using State, Territorial, local, or Tribal eminent domain authorities or other forcible acquisition procedures per 44 CFR 80.11.



b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

FEMA published a Final Rule on Property Acquisition and Relocation for Open Space (44 CFR Part 80), governing property acquisitions under FEMA’s three Hazard Mitigation Assistance (HMA) grant programs, on September 16, 2009. Of the three HMA programs, Pre-Disaster Mitigation (PDM) and the Hazard Mitigation Grant Program (HMGP), are authorized under Sections 203 and 404 of Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, P.L. 93-288 (42 U.S.C. § § 5133 and 5170c), as amended. The Flood Mitigation Assistance (FMA) program is authorized under Section 1366 of the National Flood Insurance Act (NFIA) of 1968 (42 U.S.C. 4104c), as amended.

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons. <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
c. Who will complete and submit this form? (Check all that apply.)	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input checked="" type="checkbox"/> Business entity.

¹ Personally identifiable information means any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



	<p>If a business entity, is the only information collected business contact information?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.</p>														
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i></p>														
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>															
<p>FF 086-0-31: FEMA collects some or all of the following information from HMA Grant Program Property Owners: Name, title, property address, or signature. From HMA Grant Program Subgrantee’s POC: Name, signature</p>															
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No</p>															
<table border="0"> <tr> <td><input type="checkbox"/> Social Security number</td> <td><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</td> </tr> <tr> <td><input type="checkbox"/> Alien Number (A-Number)</td> <td><input type="checkbox"/> Social Media Handle/ID</td> </tr> <tr> <td><input type="checkbox"/> Tax Identification Number</td> <td><input type="checkbox"/> Known Traveler Number</td> </tr> <tr> <td><input type="checkbox"/> Visa Number</td> <td><input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)</td> </tr> <tr> <td><input type="checkbox"/> Passport Number</td> <td><input type="checkbox"/> Driver’s License Number</td> </tr> <tr> <td><input type="checkbox"/> Bank Account, Credit Card, or other financial account number</td> <td><input type="checkbox"/> Biometrics</td> </tr> <tr> <td><input type="checkbox"/> Other. <i>Please list:</i></td> <td></td> </tr> </table>		<input type="checkbox"/> Social Security number	<input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)	<input type="checkbox"/> Alien Number (A-Number)	<input type="checkbox"/> Social Media Handle/ID	<input type="checkbox"/> Tax Identification Number	<input type="checkbox"/> Known Traveler Number	<input type="checkbox"/> Visa Number	<input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Driver’s License Number	<input type="checkbox"/> Bank Account, Credit Card, or other financial account number	<input type="checkbox"/> Biometrics	<input type="checkbox"/> Other. <i>Please list:</i>	
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<input type="checkbox"/> Passport Number	<input type="checkbox"/> Driver’s License Number														
<input type="checkbox"/> Bank Account, Credit Card, or other financial account number	<input type="checkbox"/> Biometrics														
<input type="checkbox"/> Other. <i>Please list:</i>															



g. List the <i>specific authority</i> to collect SSN or these other SPII elements.	
N/A	
h. How will this information be used? What is the purpose of the collection? Describe <i>why</i> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.	
N/A	
i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?	<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Participating property owners have notice of the collection upon voluntarily entering into the grant agreement for acquisition and demolition or relocation activities. <input type="checkbox"/> No.

3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input checked="" type="checkbox"/> Paper. Please describe. FEMA Regional Offices collect and store paper applications <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Data collected by this form for grants awarded under Hazard Mitigation Grant Program (HMGP) is stored in the HMGP System, a web-based data management system for collection, processing and storage of data and information that is used by grant Sub-applicants or by Applicants to administer program information and grant applications under HMGP. Paper forms requiring the signature of participating property owners, are scanned and electronically filed by FEMA.



	<p>Data for grants awarded under PDM or FMA is processed and stored in Mitigation (MT) eGrants, a two-part (External and Internal) online grant management system. The External MT eGrants system is used by Applicants and Sub-applicants to prepare and submit PDM or FMA applications for mitigation activities to FEMA. Signed paper forms are scanned and uploaded to MT eGrants.</p> <p>FEMA uses the Internal Mitigation eGrants system to review, select, award and store applications for mitigation assistance, and monitor grant performance.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> <p>FEMA stores original scanned paper forms for HMGP applications into a secure Local Area Network (LAN) repository; original scanned paper forms for PDM and FMA applications are stored in MT eGrants.</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe.</p> <p>Mitigation eGrants is a FEMA system that is fully accessible by FEMA. Applicants and Sub-applicants manually input responses into Mitigation eGrants for PDM or FMA applications.</p> <p>HMGP application responses are manually input into the HMGP System by grant Sub-applicants. Applicants use the HMGP System to administer program information and grant applications under HMGP. FEMA does not input responses into either system.</p>



	<input type="checkbox"/> Automatically. Please describe. Click here to enter text.
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<input type="checkbox"/> By a unique identifier. ² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text. <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> The identifier (sub-application title) used by FEMA for HMA grants under HMGP consists of the disaster number, affected State or Territory abbreviation, project number and State name. The sub-application title used for PDM and FMA grants consists of the HMA program acronym, abbreviation for project or plan, FEMA Region number, state or territory abbreviation, and sub-application year.
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>TEMPORARY. Delete file 6 years and 3 months after grant is closed, and final audit and any appeals are resolved and completed; Records Schedule Number: MIT-1-3.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Each FEMA Regional Office has a Records Management Specialist who prepares and updates a Mitigation File Plan and Retention Schedule. Proper retention and disposal per the retention schedule is systematically ensured by the Records Management Specialist and respective HMA Office.</p>
<p>f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i></p>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.	

² Generally, a unique identifier is considered any type of “personally identifiable information,” meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

[Click here to enter text.](#)

No. Information on this form is not shared outside of the collecting office.



Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	JoAnna Gorsage
Date submitted to component Privacy Office:	February 11, 2021
Date submitted to DHS Privacy Office:	February 18, 2021
Have you approved a Privacy Act Statement for this form? <i>(Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)</i>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. <p>While information is not stored and retrieved using an individual's name or other unique identifier for this collection, A Privacy Act Statement is provided on form 086-0-031. The form is attached for review.</p>
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
<p>FEMA Privacy recommends that FEMA Form 086-0-31 is categorized as Privacy Sensitive. This form collects Name, title, property address, and signature from the HMA Grant Program Subgrantee's Property Owners and the name and signature from the HMA Grant Program Subgrantee's POC.</p> <p>Since these forms relate to HMA Grants awarded to States and Territories, FEMA retrieves files/records by the State or Territory name, FEMA Disaster Number, or Grant project number/information and not by any unique identifier.</p> <p>The FEMA Privacy Branch provides the following recommendation for compliance coverage:</p>	



PIA(s): DHS/FEMA/PIA-006 FEMA National Emergency Management Information System Mitigation Electronic Grants Management System and DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System.

While SORN coverage is not required for this form, FEMA Privacy believes DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs provides additional coverage.



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Joseph Thomas
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	April 27, 2021
PTA Expiration Date	April 27, 2024

DESIGNATION

Privacy Sensitive IC or Form:	Yes If “no” PTA adjudication is complete.
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 SPII applies. <input checked="" type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
DHS IC/Forms Review:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	Choose an item. Click here to enter text.
PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/FEMA/PIA-006 FEMA National Emergency Management Information System Mitigation Electronic Grants Management System; DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
<p>SORN:</p>	<p>Choose an item.</p> <p>If covered by existing SORN, please list: Click here to enter text.</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA has submitted this new PTA for FEMA Form 086-0-31 (previously FEMA Form 81-112) Statement of Voluntary Participation for Acquisition of Property for Purpose of Open Space, which is part of the Office of Management and Budgets (OMB) Information Collection Request (ICR) Control No. 1660-0103.</p> <p>These forms support acquisitions by requiring the collection of information from grant applicants to ensure that property acquisitions are voluntary, and that the acquired property remains open space in perpetuity. FEMA collects copies of the deed restriction language from applicants as a pre-award requirement for mitigation grants to ensure that the deed to be recorded meets the minimum legal and program requirements.</p> <p>This form is signed by both property owners and local community officials to enforce the requirement that all acquisitions using FEMA mitigation grants are voluntary, and that no property is acquired using eminent domain authorities or other forcible acquisition procedures.</p> <p>DHS PRIV concurs that this constitutes a privacy-sensitive system, and requires PIA coverage. Coverage is provided by DHS/FEMA/PIA-006 FEMA National Emergency Management Information System Mitigation Electronic Grants Management System and DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System.</p> <p>SORN coverage is not required, as PII is not retrieved by unique identifier.</p> <p>DHS PRIV has reviewed the associated Privacy Act Statement and finds that it is compliant.</p>	