



## 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](mailto: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.

<b>Form Number:</b>	Not Applicable		
<b>Form Title:</b>	Not Applicable		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office:</b>	Federal Insurance and Mitigation Administration (FIMA), National Mitigation Planning Program

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

<b>Collection Title:</b>	State/Local/Tribal Hazard Mitigation Plans		
OMB Control Number	1660-0062	OMB Expiration Date:	October 31, 2025
Collection status:	Revision	Date of last PTA (if applicable):	April 16, 2021

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Jenny Burmester		
<b>Office:</b>	DHHS FEMA RSL-IM-RM-PB-PS National Mitigation Planning Program	<b>Title:</b>	Program Manager
<b>Phone:</b>	202-646-4325	<b>Email:</b>	Jennifer.burmester@fema.dhs.gov

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT



Name:	Krista Westinson		
Office:	Information Mgmt. Division	Title:	Sr. PRA Clearance Officer
Phone:	(202) 394-6377	Email:	krista.westinson@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.*

The Federal Emergency Management Agency (FEMA) Resilience submits this renewal Privacy Threshold Analysis (PTA) as part of the Office of Management and Budget (OMB) Information Collection Resource (ICR) renewal process. This PTA covers OMB ICR 1660-0062. **Since the PTA was last approved in 2021, the type of information collected and the ways in which that information is collected, used, maintained, or shared has not changed.**

### **Background**

Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. § 5165, as amended by the Disaster Mitigation Act of 2000 (DMA 2000), Pub. L. No. 106-390, provides the framework for mitigation planning by state, tribal, and local governments. The purpose of mitigation planning is to identify the natural hazards that might impact the planning area, identify actions and activities to reduce any losses from the hazards, and establish a coordinated process to implement the plan, taking advantage of a wide range of resources. Over the years, Congress has passed additional legislation providing authority for mitigation planning and connections to new assistance programs with FEMA and other agencies, such as the U.S. Army Corp of Engineers.

To be eligible for certain types of FEMA non-emergency assistance, such as Public Assistance Categories (PA) Categories C-G, Fire Management Assistance Grants (FMAG), various Hazard Mitigation Assistance (HMA) programs, and High Hazard Potential Dam Rehabilitation grants, states, tribal, and local governments are required to have an approved mitigation plan that meets the criteria established in the federal regulations at Title 44 Code of Federal Regulations (CFR) Part 201 Mitigation Planning ([44 CFR Part 201](#)). FEMA provides a guide or template for Mitigation plans; however, Mitigation plans are submitted in the format of the State, Local, or Tribal organization's preference. Mitigation plans must be updated and submitted to the State and FEMA for review and approval every 5 years to maintain eligibility.

As part of the review and approval process, FEMA corresponds with the state, tribal, and/or local government official / point of contact, including providing the approval letter and the mitigation



plan review document. The name and contact information of the points of contact are collected within the required mitigation plan documentation. FEMA collects information, including mitigation plans and related documentation by U.S. mail (less submissions by this method since inception of pandemic in March 2020), electronic mail (email), CD, SharePoint upload and electronic file transfer protocols.

- 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.*

Section 322 of the Stafford Act, as amended by the DMA 2000, and implementing regulations (44 CFR Part 201), FEMA requires a mitigation plan to be approved by FEMA in order for the state, tribal, and local government to be eligible for certain types of FEMA assistance, such as PA, Fire Management Assistance Grants (FMAG), HMA, and High Hazard Potential Dam (HHPD).

## 2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons <input type="checkbox"/> DHS Employees/Contractors (list Components) <input type="checkbox"/> Other federal employees or contractors
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	<input 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. If a business entity, is the only information collected business contact information?

<sup>1</sup> 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><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee/contractor.</p> <p><input checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i></p> <p>Point of contact/designated official for state, local, Territorial or Tribal government.</p>
d. How do individuals complete the form? <i>Check all that apply.</i>	<p><input checked="" type="checkbox"/> Paper.</p> <p>Plans may be submitted via U.S. mail (less submissions by this method since inception of pandemic in March 2020).</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p>State, Territorial or Tribal governments may submit the plan to by electronic mail (email), CD, SharePoint upload and electronic file transfer protocols.</p> <p><input type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p>
e. What information will DHS collect on the form? <i>List all individual 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>Specific requirements for State/Local/Tribal Mitigation Plans are described in 44 CFR Part 201 as well as in guidance / policies issued by FEMA (see FEMA's Mitigation Planning Regulations and Guidance website at <a href="https://www.fema.gov/emergency-managers/risk-management/hazard-mitigation-planning/regulations-guidance">https://www.fema.gov/emergency-managers/risk-management/hazard-mitigation-planning/regulations-guidance</a>).</p> <p>The information collection includes business points of contact from state, local, and tribal governments, such as name, business address, business phone number, and business e-</p>	



mail, to allow for correspondence between FEMA and the state, tribal, and/or local governments submitting the mitigation plan.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? *Check all that apply.*

- |  |  |
|--|--|
| <input type="checkbox"/> Social Security number              | <input type="checkbox"/> DHS Electronic Data Interchange |
| <input type="checkbox"/> Alien Number (A-Number)             | Personal Identifier (EDIPI)                              |
| <input type="checkbox"/> Tax Identification Number           | <input type="checkbox"/> Social Media Handle/ID          |
| <input type="checkbox"/> Visa Number                         | <input type="checkbox"/> Known Traveler Number           |
| <input type="checkbox"/> Passport Number                     | <input type="checkbox"/> Trusted Traveler Number (Global |
| <input type="checkbox"/> Bank Account, Credit Card, or other | Entry, Pre-Check, etc.)                                  |
| financial account number                                     | <input type="checkbox"/> Driver's License Number         |
| <input type="checkbox"/> Other. <i>Please list:</i>          | <input type="checkbox"/> Biometrics                      |

Not applicable (N/A) – SSN / SPII not collected.

g. List the **specific authority** to collect SSN or these other SPII elements.

N/A

h. How will the SSN and SPII information be used? What is the purpose of the collection?

N/A

i. Is SSN necessary to carry out the functions of this form and/or fulfill requirements of the information collection? *Note:* even if you are properly authorized to collect SSNs, you are required to use an alternative identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as truncating the SSN.

N/A

j. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of the collection or is form filled out by third party*)?

☒ Yes. Please describe how notice is provided.

FEMA provides notice of system collection of information via a link on the online grant application website as well as through the following PIA and SORN: DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System and DHS/FEMA – 009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs System of Records Notice.



	<input type="checkbox"/> No.
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### 3. How will DHS store the IC/form responses?

a. How will DHS store the original, completed IC/forms?	<p><input checked="" type="checkbox"/> Paper. Please describe.</p> <p>Regions accepting paper submissions are responsible for storage.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.</p> <p>Electronic submissions are received via CD, e-mail, SharePoint upload, and/or file transfer protocol and are saved to FEMA shared drives, and/or SharePoint.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> <p>Scanned forms are saved to FEMA shared drives, and/or SharePoint.</p>
b. If electronic, how does DHS input the responses into the IT system?	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe.</p> <p>FEMA regional staff manually save documents on FEMA shared drives and/or SharePoint.</p> <p><input type="checkbox"/> Automatically. Please describe.</p>
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the	<p><input type="checkbox"/> By a unique identifier.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <ul style="list-style-type: none"><li>• Plan title</li></ul>

<sup>2</sup> 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.





information retrieved?	<ul style="list-style-type: none"><li>• MPP Plan ID,</li><li>• FEMA Community Identifier (CID)</li><li>• Community MPP GeoID</li></ul>
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	MIT-1-1: Retire to FRC 3 years after project cut off (end of approval period).
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	Each FEMA program office has a Records Custodian or Records Liaison Officer that provides guidance, awareness, and training on proper records management.
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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.	
<input type="checkbox"/> Yes, information is shared <i>external</i> to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe. Click here to enter text.	
<input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office. FEMA does not share PII or mitigation plans outside of the agency. However, FEMA may share mitigation plan status with other FEMA components to determine eligibility for PA, FMAG, HMA, and HHPD.	



**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:	<b>Stephen Kankam</b>
Date submitted to Component Privacy Office:	January 23, 2024
Concurrence from other Components involved (if applicable):	Click here to enter text.
Date submitted to DHS Privacy Office:	March 11, 2024
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. The information is not collected on a form and is not a part of a system of records (i.e. not retrieved by identifier). However, notice is generally provided via the published PIA (DHS/FEMA /PIA-025 Hazard Mitigation Grant Program (HMGP) System).
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>	
FEMA Privacy considers the State/Local/Tribal Mitigation Plan (ICR 1660-0062) to be a privacy-sensitive collection as it collects business information from state, local and tribal government including name, business address, business phone number and business email.  FEMA recommends the following privacy compliance coverage:  <b>PIA:</b> DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System DHS/ALL/PIA-006 General Contacts List	



**SORN** coverage is not required as information is not retrieved by a unique identifier but rather, information is retrieved by State, Tribal, and/or local government, and /or mitigation plan.

## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	<b>Erika Lewis</b>
PCTS Workflow Number:	<b>0016667</b>
Date approved by DHS Privacy Office:	March 13, 2024
PTA Expiration Date	March 13, 2027
DHS Privacy Office Approver (if applicable):	<b>Schuntel Reddock</b>

## DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If “no” PTA adjudication is complete.</b>
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 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.
Privacy Act Statement:	Choose an item. Click here to enter text.
System PTA:	Choose an item. Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: DHS/ALL/PIA -006 DHS General Contacts List; 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>
SORN:	<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:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA submits a renewal PTA concern FEMA collects information, including mitigation plans and related documentation through a variety of methods. Although the method for collection of information has changed since the last PTA, the type of information collected and the ways in which that information is used, maintained, or shared has not changed.</p> <p>The purpose of mitigation planning is to identify the natural hazards that might impact the planning area, identify actions and activities to reduce any losses from the hazards, and establish a coordinated process to implement the plan.</p> <p>As part of the review and approval process, FEMA corresponds with the state, tribal, or local point of contact, including providing the approval letter and the mitigation plan review document. The name and contact information of the points of contact are collected within the required mitigation plan documentation.</p> <p>DHS PRIV concurs with FEMA that this constitutes a privacy-sensitive system, and requires PIA coverage, as information including name, business address, business phone number, and business email is collected. Coverage is provided by DHS/ALL/PIA -006 DHS General Contacts List. Additional PIA coverage is provided by DHS/FEMA/PIA-025 Hazard Mitigation Grant Program (HMGP) System, which covers PII of grantees or subgrantees as well as PII on individual property owners associated with grants or sub-grants. SORN coverage is not required as information is not retrieved by a unique identifier.</p>	