



Privacy Threshold Analysis

Version date: June 10th, 2009

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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
Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, 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 DHSOnline and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.



PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.
Upon receipt, the DHS Privacy Office will review this form
and may request additional information.

SUMMARY INFORMATION

DATE submitted for review: August 14, 2009

NAME of Project: Environmental-Historic Preservation Management Information System (EMIS)

Name of Component: Federal Emergency Management Agency

Name of Project Manager: Angela Gladwell; Laura Shick

Email for Project Manager: angela.gladwell@dhs.gov; laura.shick@dhs.gov

Phone number for Project Manager: A. Gladwell: 202-646-3193; L. Shick: 202-646-2685

TYPE of Project:

☒ **Information Technology and/or System***

☐ **A Notice of Proposed Rule Making or a Final Rule.**

☐ **Other: <Please describe the type of project including paper based Privacy Act system of records.>**

* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

- "Information Technology" means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

- "Information System" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



SPECIFIC QUESTIONS

1. Describe the project and its purpose:

EMIS is a stand-alone web-based system created to standardize FEMA's environmental planning and historic preservation (EHP) compliance review process through consistency in data collection, storage, and decision-making. Numerous Federal EHP laws and Executive Orders apply to Federal agencies and Federally-funded actions, including FEMA's grant-funded projects related to disaster response, recovery, mitigation, and emergency preparedness. Examples of EHP laws and Executive Orders include the following: National Environmental Policy Act, National Historic Preservation Act, Endangered Species Act, Executive Order 19988 - Floodplain Management, Executive Order 11990 - Protection of Wetlands, and Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. EMIS is used to document the agency's compliance with these EHP requirements.

With EMIS, all EHP reviews are conducted and all EHP-related documentation is stored in a standard manner in a single system. The use of EMIS ensures that the EHP compliance review is performed consistently and in a standard manner for all FEMA-funded projects across all disaster and non-disaster programs. The automation of the EHP review and compliance determination process is more efficient than conducting paper-based project reviews, thereby allowing faster approval and funding of projects.

2. Status of Project:

☐ This is a new development effort.

☒ This is an existing project.

Date first developed: September 21, 2006

Date last updated: May 27, 2009

Database code change (no application/java changes) so that EMIS is able to process Public Assistance Grant Program projects submitted by the Emergency Management Mission Integrated Environment (EMMIE) that were initially not queued to EMIS for EHP review.



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3. Could the project relate in any way to an individual?¹

☐ No. Please skip ahead to the next question.

☒ Yes. Please provide a general description, below.

EMIS does not collect information from applicants for FEMA grant assistance, instead that information is collected by the FEMA grant program itself (e.g. Public Assistance Grant Program). However, EMIS stores copies of correspondence (letters, emails, faxes, and transcripts of telephone conversations) with resource agencies (e.g. US Fish and Wildlife Service, State Historic Preservation Offices), which may include names of staff at those agencies and their business contact information. The names and business contact information of these individuals consulted can be typed and stored in the various comment fields of EMIS. The sole purpose of collecting and storing this information is to document compliance with EHP requirements.

4. Do you collect, process, or retain information on: (Please check all that apply)

☒ DHS Employees

☒ Contractors working on behalf of DHS

☒ The Public

☐ The System does not contain any such information.

5. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)

☒ No.

☐ Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

<Please provide the function of the SSN and the legal authority to do so.>

¹ Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.



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6. What information about individuals could be collected, generated or retained?

Under the various EHP laws, (examples of which are located in section 1), FEMA is legally required to consult with other Federal, state and local agencies and offices responsible for the protection and management of environmental resources and historic properties.

EMIS may store information on staff, consultants, and contractors who prepare EHP documents, conduct EHP analyses, and perform the EHP project review. Information that may be stored in EMIS includes:

- Names (first, last, middle)
- Business mailing addresses
- Business email addresses
- Business telephone numbers (desk, cell, blackberry)
- Business fax numbers

7. If this project is a 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 the next question.

☐ Yes. Is there a log kept of communication traffic?

☐ No. Please continue to the next question.

☐ Yes. What type of data is recorded in the log? (Please choose all that apply.)

☐ Header

☐ Payload Please describe the data that is logged.

<Please list the data elements in the log.>

8. Can the system be accessed remotely?

☐ No.

☒ Yes. When remote access is allowed, is the access accomplished by a virtual private network (VPN)?

☐ No.

☒ Yes.



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9. Is Personally Identifiable Information² physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)

☒ No.

☐ Yes.

10. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems³?

☒ No

☐ Yes. Please list:

EMIS has a link to view subgrant applications that are generated in the Mitigation Directorate's eGrants system (MTeGrants) and in EMMIE. MTeGrants is currently the grants management system for the non-disaster Hazard Mitigation Assistance Grant Program (Pre-Disaster Mitigation Grant Program, Flood Mitigation Assistance Grant Program, Severe Repetitive Loss Grant Program, Repetitive Flood Claims Grant Program), and EMMIE is currently the grants management system for the Public Assistance Grant Program.

11. Are there regular (ie. periodic, recurring, etc.) data extractions from the system?

☐ No.

☒ Yes. Are these extractions included as part of the Certification and Accreditation⁴?

EMIS data is extracted, transformed, and loaded (ETL) electronically via Oracle's materialized views every night into FEMA's Enterprise Data Warehouse. The Data Warehouse is a web-based analytical database used to perform ad-hoc reporting, evaluate trends, and decide where best to assign resources to accomplish FEMA's mission. Both EMIS and Data Warehouse are only available to users with a FEMA domain account (i.e. agency staff and contractors).

☐ Yes.

☒ No.

² Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

³ 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.

⁴ This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)



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12. Is there a Certification & Accreditation record within OCIO's FISMA tracking system?

☐ Unknown.

☒ No.

Office of Environmental Planning & Historic Preservation (OEHP) is currently working with the Mitigation Directorate's Enterprise Architecture team to complete the C&A, and has budgeted to complete the initial phase in FY10.

☐ 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 the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: September 16, 2009

NAME of the DHS Privacy Office Reviewer: Rebecca J. Richards

DESIGNATION

☐ **This is NOT a Privacy Sensitive System** – the system contains no Personally Identifiable Information.

☒ **This IS a Privacy Sensitive System**

Category of System

- ☒ IT System
- ☐ National Security System
- ☐ Legacy System
- ☐ HR System
- ☐ Rule
- ☐ Other:

Determination

- ☐ PTA sufficient at this time
- ☐ Privacy compliance documentation determination in progress
- ☐ PIA is not required at this time
- ☒ A PIA is required
 - ☒ System covered by existing PIA: FEMA Grants
 - ☐ A new PIA is required.
 - ☐ A PIA Update is required.
- ☒ A SORN is required
 - ☒ System covered by existing SORN: DHS/FEMA-004
 - ☐ A new SORN is required.

DHS PRIVACY OFFICE COMMENTS