



**Homeland  
Security**

The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
703-235-0780, pia@dhs.gov  
www.dhs.gov/privacy

**Privacy Threshold Analysis**  
**Version date: June 10, 2010**  
*Page 1 of 7*

**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 from the 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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

**Date Submitted for Review: August 19, 2011**

**Name of Project: Federal Assistance to Individuals and Households Programs**

**System Name in TAFISMA: N/A**

**Name of Component: Federal Emergency Management Agency**

**Name of Project Manager: Lumumba T. Yancey**

**Email for Project Manager: lumumba.yancey@dhs.gov**

**Phone Number for Project Manager: 202-212-1133**

**Type of Project:**

- Information Technology and/or System.\*
- A Notice of Proposed Rule Making or a Final Rule.
- Form or other Information Collection.
- 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:

Section 206(a) of the Disaster Mitigation Act of 2000 (DMA 2000), Public Law 106-390, consolidated into one section of the Robert T. Stafford Disaster Relief and Emergency Assistance Act two previously existing programs, the "Temporary Housing Assistance" and the "Individual and Family Grant Programs" into a single program called the "Federal Assistance to Individuals and Households" (IHP). To implement this consolidation, which streamlined the provision of assistance to disaster victims, FEMA published rule 44 CFR Part 206 which included this collection of information under the purview of the Paperwork Reduction Act. This information collection provides: 1) disaster victims the opportunity to request approval of late applications, continued assistance, and appeal program decisions and, 2) States with a better opportunity to be active participants in the "Other Needs" provision of the IHP through the review of an administrative option agreement and the development of an administrative plan.

Individuals requesting approval of late application, request for continued assistance, or appealing a program decision would be required to submit such a request either by completing FEMA Form 010-0-12 "Application for Continued Temporary Housing Assistance", or in writing via mail or fax to FEMA's Maryland National Processing and Service Center. A FEMA appeals officer will review the information submitted in accordance with established program criteria and procedures. Individuals wishing to request continued assistance with rent will be required to submit via mail or fax a signed "Application for Continued Temporary Housing Assistance," which includes information on income, housing cost, and their individual recovery strategy. The purpose of an Administrative Option Agreement between FEMA and the State is to establish a plan for the delivery of assistance under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended. States opting to participate in the administration or management of the Other Needs provision of IHP must submit via mail a signed FEMA Form 010-0-11 (formerly FEMA Form 90-153), "Individual and Households Program (IHP) – Other Needs Assistance Administrative Option Selection", which includes a signed standard personal property list for that calendar year, establishing the State's proposed level of support and participation in the delivery of assistance under Section 408 of the Stafford Act. The FEMA Regional Director or designee and the State will use the agreement for planning and developing program implementation procedures to be used during the next calendar year in the implementation of programs under Section 408 of the Stafford Act.

### 2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: March 3, 2003



## Privacy Threshold Analysis

Version date: June 10, 2010

Page 4 of 7

Date last updated: January 19, 2009

The FEMA Form 010-0-12, "Application for Continued Temporary Housing Assistance," is a consolidated document that obtains from FEMA applicants the information already approved under the current collection. In order to collect the information so that FEMA can make a determination, FEMA is prescribing the new form as part of this collection requirement. In the past, we learned that applicants were not responding with all of the required documents necessary to determine their eligibility for continued assistance. This only increased the time and burden to both, as the applicant and staff repeatedly requested missing documentation. The newly prescribed form lays out the requirements of what each applicant must submit when applying for continued assistance.

The standard personal property line item list is a document that States have been providing for signature in the past. The signature provides verification to FEMA that the list has been reviewed and the state has been afforded the opportunity to make any changes to the standard list that it feels is appropriate for the State. The States are familiar with the process of providing signature for this two page document and FEMA has held conferences and conference calls in which this list has been explained. FEMA is not requesting that a static document be added to the collection, but has added the list, as it is updated annually based upon FEMA analysis, review and State input. Due to possible annual changes, FEMA requires signature of the State. The FEMA Form 010-0-11 (formerly FEMA Form 90-153) was approved for use in this collection in 2009. These forms are part of FEMA's OMB No. 1660-0061 information collection.

**3. From whom 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.

**4. 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:



## Privacy Threshold Analysis

Version date: June 10, 2010

Page 5 of 7

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

Individuals:

- Disaster Applicant Name (First, Last, and Middle)
- Applicant Physical Address(es) (Mailing, Residence)
- Applicant Disaster Registration Number
- Applicant Phone Number(s) (including alternate)
- Applicant Expenses Information (Utility/Mortgage bills and payment history)
- Applicant Housing Unit Leasing Information (Information found on a lease including landlord contact information and cancelled checks)
- Resident(s) Name (First, Last, and Middle)
- Resident(s) Income Information (including paystubs and other income documentation)
- Applicant (Co-Applicant) Signature

States:

- Governor or Designee Signature
- FEMA Employee Signature

### 6. 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.>



7. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems<sup>1</sup>?

No.

Yes.

Please list:

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

Unknown.

No.

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: August 19, 2011

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.

<sup>1</sup> 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.



- HR System.
- Rule.
- Other: FEMA Forms 010-0-11 and 010-0-12

### **Determination**

- PTA sufficient at this time.
- Privacy compliance documentation determination in progress.
- PIA is not required at this time.
- PIA is required.
  - System covered by existing PIA: DHS/FEMA/PIA-012 Disaster Assistance Improvement Plan (DAIP) and DHS/FEMA/PIA-009 Document Management and Records Tracking System (DMARTS)
    - New PIA is required.
    - PIA update is required.
  - SORN not required at this time.
  - SORN is required.
    - System covered by existing SORN: DHS/FEMA-008 Disaster Recovery Assistance Files
      - New SORN is required.

### **DHS PRIVACY OFFICE COMMENTS**