

Privacy Threshold Analysis Version date: June 10, 2010 Page 1 of 21

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



Privacy Threshold Analysis Version date: June 10, 2010 Page 2 of 21

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

| Date Submitted for Review: September 15, 201 | 0 |
|--|---|
|--|---|

Name of Project: Disaster Assistance Improvement Program (DAIP)

System Name in TAFISMA: Disaster Assistance Improvement Program (DAIP)

Name of Component: Federal Emergency Managment Agency

Name of Project Manager: William Prusch

Email for Project Manager: Bill.Prusch@dhs.gov

Phone Number for Project Manager: 540-722-8477

| | Project | t: | |
|--|---------|----|--|
| | | _ | |

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.>

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.

^{*} 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:

^{•&}quot;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).

[&]quot;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).



Privacy Threshold Analysis Version date: June 10, 2010 Page 3 of 21

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

On August 29, 2006, President Bush issued Executive Order #13411: Improving Assistance for Disaster Victims, directing the Secretary of Homeland Security to lead an interagency task force with the mission of improving the promptness and efficiency with which disaster victims obtain access to eligible federal disaster assistance. The Executive Order required the Disaster Assistance Task Force (DATF) to develop and, by March 31, 2007, deliver a plan outlining a coordinated, actionable strategy to implement a consolidated and unified disaster assistance application capability no later than December 31, 2008. After Executive Order: DAIP was approved by the President on September 14, 2007 and implementation of DAIP began two weeks later. To achieve this goal, the Secretary of Homeland Security established a Disaster Assistance Task Force Executive Steering Committee (ESC), led by the Federal Emergency Management Agency (FEMA), to devise a plan for improving assistance and providing better access to disaster benefit programs for disaster victims. The DATF devised an approach strategy known as the Disaster Assistance Improvement Plan (DAIP), which defines the plan for executing against milestones and leveraging existing technologies that most effectively meet the requirements of the Executive Order. The DAIP specifies: "The fastest, most cost-effective method of achieving the objective of the Executive Order (a single application and status-access portal for Federal disaster assistance, complemented by an all-sources assistance reference library) will be through a technical collaboration of two existing systems, the Department of Labor's (DOL) GovBenefits.gov system and the Federal Emergency Management Agency's National Emergency Management Information System (NEMIS)." This project implements FEMA's portion of the DAIP by enhancing FEMA's existing National Emergency Management Information System (NEMIS) Disaster Assistance Center (DAC) module.

The program has been operational with a valid ATO since 12/15/2008. This is an update to the current PTA published in 2008 during the initial release of DAIP. The following interfaces and enhancements will be added:

• State interfaces:

- o Disaster Supplementary Nutrition Assistance Program (DSNAP)
 - E.g. Florida (Food For Florida) and Louisiana
- o Other Needs Assistance (ONA) program
 - E.g. Texas (pilot)
- o Disaster Legal Services
- FEMA Crises Counseling
- Disaster Unemployment Assistance (DUA)

Federal entities:

- HUD (to enhance the existing interface in an effort to avoid the duplication of benefits)
- o SBA (to enhance the existing interface in an effort to avoid the duplication of benefits)



Privacy Threshold Analysis Version date: June 10, 2010 Page 4 of 21

- DOJ (to build a real-time interface to NEMIS to allow law enforcement organizations the ability to identify and locate criminals or to locate those who have used an emergency or disaster to relocate and avoid detection or to perpetrate fraud)
- United States Postal Service (for change of address requests)
- Other United States Federal entities
- Registration Intake Optimization for Smartphones (RIOS)
 - o FEMA form 90-69 converted into an accessible mobile platform (an exact replication of fields found in the online and paper versions of the 90-69)
 - Other future mobile initiatives
- Profit/Non-Profit Entities (PNP)
 - American Red Cross, CAN.org, United Way, Catholic Charities and other member organizations of the National Voluntary Organization Active in Disaster (NVOAD)
- Tribal Communities
- Surge
 - to develop a scalable capacity to support a number of simultaneous applications and, concurrently, a number of simultaneous inquiries of applicant application status

2. Status of Project:

| This is a new development effort. |
|---|
| igstyle This is an existing project. |
| Date first developed: December 15, 2008 |
| Date last updated: June 30, 2010 |

The Disaster Assistance Center (DAC) accepts GovBenefits.gov information and creates a single ad hoc interview for multiple disaster assistance programs. The information passed from DOL to FEMA includes the initial questionnaire answers but no Personally Identifiable Information. An Memorandum of Understanding (MOU) between DOL and FEMA will address the secure transmission of data. DAC then forwards relevant data to each of the applied to Federal disaster assistance program's Agency Application Processing System for processing. Access to the system is granted only to agencies that have established an MOU with FEMA. The DAC Data Exchange Point will support the following types of transactions:

- 1. New application to external Agency Application Processing Systems from the DAC.
- 2. New application to the DAC from an Agency Application Processing System.
- 3. Request for status of an application to an external Agency Application Processing System from the DAC.



Privacy Threshold Analysis Version date: June 10, 2010 Page 5 of 21

- 4. Receive status of an application to the DAC from an external Agency Application Processing System.
- 5. Update (e.g., change of mailing address) an application to an external Agency Application Processing Systems from DAC.
- 6. Update of an application to the DAC from an external Agency Application Processing System.

Initially, a citizen will be directed to the existing GovBenefits Internet portal, where a series of non-personal interview questions will determine their initial eligibility for any forms of disaster assistance. The answers to the GovBenefits' questions together with the citizen's initial eligibility will accompany a transfer to FEMA's DAC Module. An MOU and Interagency Security Agreement (ISA) will govern the secure transfer of information. The DAC Module will use the information transferred by GovBenefits to collect other information, including personally identifiable information, required by FEMA and the other DAIP participating agencies' forms of assistance. DAC will exchange the collected information with the identified participating agency or agencies and periodically receive updated status reports from the participating agencies. These data exchanges will also be governed by an MOU and ISA with each participating agency.

The first state-based interface will be the Food for Florida (FFF) program for the DSNAP program (scheduled release is January 2011). This will be followed by USPS, HUD, DOJ and other states (ONA and DSNAP) in 2011.

One of the DAIP requirements is to develop a scalable capacity to support a number of simultaneous applications and, concurrently, a number of simultaneous inquiries of applicant application status. Within the DAIP program, this scalable capacity became known as the DAIP "Surge" requirement.

The Surge effort is to develop a prototype capability that can be shown to meet the capacity requirements of DAIP and can successfully complete integration into the FEMA Enterprise Architecture, while achieving FEMA Designated Approving Authority Certification and Accreditation.

The Surge effort will provide tools, techniques, and subject matter expertise in assisting the Government in the creation of a production surge capability to meet the applicant intake and inquiry surge goals. Please



Privacy Threshold Analysis Version date: June 10, 2010 Page 6 of 21

| 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: |
| | SSNs are collected as an electronic analog of FEMA Form 90-69 (OMB NO: 009-0-1) and are used to prevent the duplication of disaster benefits among FEMA, Federal, and state and local disaster agencies. The legal basis and authorization are The Robert T. Stafford Disaster Relief and Emergency Assistance Act P.L. 93-288 (42 U.S.C. 5121-5206), as amended, and 44 Code of Federal Regulations (44 CFR) Subchapter DDisaster Assistance, Part 206Federal Disaster Assistance for Disasters Declared on or After November 23, 1988, the Disaster Mitigation Act of 2000. |

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

DAIP will support Application Submission, Application Updates, and Application Status Requests. The application information may contain any combination of specific identifiable information (depending on which programs an applicant elects to apply) including an individual's name, home address, Social Security number, home phone number, temporary address and phone numbers, personal financial information including applicant's bank name, bank account information, insurance information, individual or household income, the home's number of occupants, and the dollar amount of their disaster losses. Please see Appendix A. No new data elements will be collected with federal, state, PNP, tribal and mobile interfaces.



Privacy Threshold Analysis Version date: June 10, 2010 Page 7 of 21

| 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 data="" elements="" in="" list="" log.="" the=""></please> | | | | | | |
| 7. | Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems ¹ ? | | | | | | |
| | 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: | | | | | | |
| | Integrity: | | | | | | |
| | Availability: | | | | | | |
| | | | | | | | |

¹ 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.



Privacy Threshold Analysis Version date: June 10, 2010 Page 8 of 21

PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: January 18, 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. |
| HR System. |
| Rule. |
| Other: |
| 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: DAIP PIA |
| New PIA is required. |
| PIA update is required. |
| SORN not required at this time. |
| \boxtimes SORN is required. |
| System covered by existing SORN: DHS/FEMA-008 DRAFS |
| New SORN is required. |

DHS PRIVACY OFFICE COMMENTS



Privacy Threshold Analysis Version date: June 10, 2010 Page 9 of 21

APPENDIX A – Data Elements

The following tables contain the data elements for DAIP. There may be additional revisions to this section which will be updated accordingly in this document as well as the PIA and SORN. IAC Shared Data Identified below are data elements from the RI application intake that are already deleted will be part of the current data exchange with SBA (or may originate from SBA). HUD and VA data elements have not been defined at this writing of this PTA draft, but will include data elements from this table.

Table A.1: IAC Online Captured Data Elements

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|---------------------------|-------------------|--|------------|---|---|
| 1.1 | Prefix | CHAR(3) | Personal Identification - Prefix | Y | Both | |
| 1.2 | First Name | VARCHAR2(5 0) | Personal Identification – First Name | Y | Both | |
| 1.3 | Middle Name | VARCHAR2(1 5) | Personal Identification – MI | Y | Both | |
| 1.4 | Last Name | VARCHAR2(5 0) | Personal Identification – Last Name | Y | Both | |
| 1.5 | SSN | CHAR(9) | Personal Identification – SSN | Y | Own system | SSN is a unique id number for applicants that SBA uses to pull credit reports. Changing it later in the process could have significant impact on loan decisions |
| 1.6 | Email Address | VARCHAR2(2 54) | Personal Identification – | Υ | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 10 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|---|--------------|---|------------|---|----------|
| | | | Email Address | | | |
| 1.7 | Date of Birth | DATE | Personal Identification – Date of Birth | Υ | Both | |
| 2.1 | Primary Phone Area Code | CHAR(3) | Contact Phone Number – Damaged Phone: Area Code | Υ | Both | |
| 2.2 | Primary Phone Number | CHAR(7) | Contact Phone Number – Damaged Phone: Number | Y | Both | |
| 2.3 | Primary Phone Area Code | CHAR(3) | Contact Phone Number – Current Phone: Area Code | Υ | Both | |
| 2.4 | Primary Phone Number | CHAR(7) | Contact Phone Number – Current Phone: Number | Υ | Both | |
| 2.5 | Primary Phone Extensio n Number | CHAR(4) | Contact Phone Number – Current Phone: Extension | Y | Both | |
| 2.6 | Primary Phone Note | VARCHAR2(50) | Contact Phone Number – Current Phone: Note | Υ | Both | |
| 2.7 | Alternat e Phone Area Code | | Contact Phone Number – Cell Phone: Area Code | Υ | Both | |
| 2.8 | Alternat e Phone Number | CHAR(7) | Contact Phone Number – Cell Phone: Number | Υ | Both | |
| 2.9 | Alternat e Phone Area Code | CHAR(3) | Contact Phone Number – Alternate Phone: Area Code | Υ | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 11 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|---|--------------|---|------------|---|----------|
| 2.10 | Alternat e Phone Number | CHAR(7) | Contact Phone Number – Alternate Phone: Number | Υ | Both | |
| 2.11 | Alternat e Phone Extensio n | CHAR(4) | Contact Phone Number – Alternate Phone: Extension | Υ | Both | |
| 2.12 | Alternat e Phone Note | VARCHAR2(50) | Contact Phone Number – Alternate Phone: Note | Υ | IAC | |
| 3.1.1 | Dwelling Address Street Name | VARCHAR2(60) | Damaged Dwelling Address - Street Address | Υ | Both | |
| 3.1.2 | Dwelling Address City Name | VARCHAR2(28) | Damaged Dwelling Address – City | Υ | Both | |
| 3.1.3 | Dwelling State Code | CHAR(2) | Damaged Dwelling Address – State | Υ | Both | |
| 3.1.4 | Dwelling ZIP Code | CHAR(5) | Damaged Dwelling Address – Zip | Υ | Both | |
| 3.1.5 | Dwelling Address ZIP Extensio n Number | CHAR(4) | Damaged Dwelling Address – Zip+4 | Y | Both | |
| 3.1.6 | Dwelling Residenc e Owned Flag | CHAR(1) | Damaged Dwelling Address – Own/Rent | Υ | Both | |
| 3.1.7 | Mailing Address Note Text | VARCHAR2(60) | Damaged Dwelling Address – Mailing Address – In care of | Υ | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 12 of 21

| | | | | | | T . |
|---------------------|--|-------------------|---|------------|---|---|
| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
| 3.1.8 | Mailing Address Street Name | VARCHAR2(60) | Damaged Dwelling Address – Mailing Address – Street Address | Υ | Both | |
| 3.1.9 | Mailing Address City Name | VARCHAR2(28) | Damaged Dwelling Address – Mailing Address – City | Y | Both | |
| 3.1.10 | Mailing State Code | CHAR(2) | Damaged Dwelling Address – Mailing Address – State | Y | Both | |
| 3.1.11 | Mailing ZIP Code | CHAR(5) | Damaged Dwelling Address – Mailing Address – Zip | Y | Both | |
| 3.1.1 | Mailing Address ZIP Extensio n Number | CHAR(4) | Damaged Dwelling Address – Mailing Address – Zip+4 | Y | Both | |
| 3.2.1 | Place Code | NUMBER(5) | Damaged Dwelling County/Parish/ Municipio | Υ | Both | IS this based on standard FIPS county codes? |
| 4.1.1 | Disaster Number | NUMBER(5) | Disaster Selection | Υ | Own system | This has an impact on eligibility for assistance |
| 4.2.1 | Damage Type | VARCHAR2(2 00) | Damage Type - Options: Fire/Smoke/Soo t, Flood, Hail/Rain/Wind Driven Rain, Ice/Snow, Power | Y | Both | * Checkbox list |



Privacy Threshold Analysis Version date: June 10, 2010 Page 13 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|--|-------------------|---|------------|---|--------------------|
| | | | Surge/Lightning, Seepage, Sewer Backup, Earthquake, Other Damage, Tornado/Wind, Other Damage Text | | | |
| 5.1 | Home Damage Flag | CHAR(1) | Disaster Related Losses – Home Damaged – Y/N | Υ | Both | |
| 5.2 | Personal Property Damage Flag | CHAR(1) | Disaster Related Losses – Personal Property – Y/N | Y | Both | |
| 5.3 | Residenc e Utilities Flag | CHAR(1) | Disaster Related Losses - Utilities - Y/N | | Both | |
| 6.1.1 | Current Location Type Code | VARCHAR2(1 6) | Damaged Dwelling – Current Location | Y | Both | We need the codes |
| 6.1.2 | Residenc e Type Code | VARCHAR2(1 6) | Damaged Dwelling – Type of Home | Υ | Both | We need the codes |
| 6.1.3 | Residenc e Primary Flag | CHAR(1) | Damaged Dwelling – Primary Residence | Υ | Both | |
| 6.1.4 | Access Restricte d Code | VARCHAR2(1 6) | Damaged Dwelling – Access to Residence | Y | | We need the codes |
| 6.2.1 | Home Insuranc e | VARCHAR2(2 00) | Home Insurance - Options (Y/N and Company Name): Condo/Townhou se, Contents Only, Flood, Homeowners, | Y | Both | * Checkbox list |



Privacy Threshold Analysis Version date: June 10, 2010 Page 14 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|----------------------------|-----------|---|------------|---|--------------------|
| | | | Homeowners with Sewer Backup Rider, Mobile Home, NONE | | | |
| 7.1.1 | Medical Expense Flag | CHAR(1) | Disaster Related Expenses - Medical Expenses - Y/N | N | | |
| 7.1.2 | Dental Expense Flag | CHAR(1) | Disaster Related Expenses - Dental Expenses - Y/N | N | | |
| 7.1.3 | Funeral Expense Flag | CHAR(1) | Disaster Related Expenses - Funeral Expenses - Y/N | N | | |
| 7.2.1 | Other Insuranc e | | Other Insurance - Options (Y/N and Company Name): Dental, Funeral or Burial, Health/Medical, Medicaid/Title XIX, NONE | | | * Checkbox list |
| 7.3.1 | Vehicle Damage Flag | CHAR(1) | Vehicle Damage - Y/N | Υ | Both | |
| 7.4.1 | Model Year Number | NUMERIC | Update Vehicle – Year | Υ | Both | |
| 7.4.2 | Make Text | VARCHAR | Update Vehicle - Make | Y | Both | |
| 7.4.3 | Model Text | VARCHAR | Update Vehicle – Model | Υ | Both | |
| 7.4.4 | Damage d Flag | VARCHAR | Update Vehicle – Damaged – Y/N | Υ | Both | |
| 7.4.5 | Drivable Flag | VARCHAR | Update Vehicle - Driveable - Y/N | | | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 15 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|-----------------------------------|-------------------|--|------------|---|--------------------|
| 7.4.6 | Compreh ensive Insuranc e Flag | VARCHAR | Update Vehicle – Comprehensive Insurance – Y/N | Υ | Both | |
| 7.4.7 | Liability Insuranc e Flag | VARCHAR | Update Vehicle – Liability Insurance – Y/N | Υ | Both | |
| 7.4.8 | Register ed Flag | VARCHAR | Update Vehicle - Registered – Y/N | Υ | Both | |
| 8.1.1 | Other Expense s Flag | CHAR(1) | Miscellaneous Purchases – Y/N | N | | |
| 9.1.1 | Emergen cy Food Flag | CHAR(1) | Emergency Needs - Food – Checkbox | N | | |
| 9.1.2 | Emergen cy Shelter Flag | CHAR(1) | Emergency Needs – Shelter– Checkbox | N | | |
| 9.1.3 | Emergen cy Clothing Flag | CHAR(1) | Emergency Needs - Clothing– Checkbox | N | | |
| 9.2.1 | Special Needs Flag | CHAR(1) | Special Needs – Y/N | Υ | Own System | |
| 9.3.1 | Mobility Flag | CHAR(1) | Special Needs - Mobility - Y/N | N | | |
| 9.3.2 | Mental Flag | CHAR(1) | Special Needs – Mental - Y/N | N | | |
| 9.3.3 | Ear Flag | CHAR(1) | Special Needs – Hearing - Y/N | N | | |
| 9.3.4 | Eye Flag | CHAR(1) | Special Needs – Vision - Y/N | N | | |
| 9.3.5 | Other Flag | CHAR(1) | Special Needs – Other - Y/N | N | | |
| 9.4.1 | Mobility Options List | VARCHAR2(2 00) | Special Needs Specific Categories – | N | | * Checkbox list |



Privacy Threshold Analysis Version date: June 10, 2010 Page 16 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|-------------------------------------|-------------------|--|------------|---|--------------------|
| | | | Mobility Options: Wheelchair, Walker, Cane, Lift, Bath Chair, Personal Care Attendant | | | |
| 9.4.2 | Mental Health Options List | VARCHAR2(2 00) | Special Needs Specific Categories – Cognitive/Menta I Health Options: Personal Care Attendant, Other(text box) | N | | * Checkbox list |
| 9.4.3 | Hearing Options List | VARCHAR2(2 00) | Special Needs Specific Categories – Hearing or Speech Options: Hearing Aid, Sign Language Interpreter, TDD/TTY, Text messaging and/or other communication device | N | | * Checkbox list |
| 9.4.4 | Vision Options List | VARCHAR2(2 00) | Special Needs Specific Categories – Vision Options: Glasses, White cane, Service Animal, Braille, Magnifier | N | | * Checkbox list |
| 9.4.5 | Other Options List | VARCHAR2(2 00) | Special Needs Specific Categories – Other – Text Box | N | | |
| 10.1.1 | Occupan t Last | VARCHAR2(5 0) | Update Occupant – Last | Υ | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 17 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|--|------------------|--|------------|---|-------------------|
| | Name | | Name | | | |
| 10.1.2 | Occupan t First Name | VARCHAR2(5 0) | Update Occupant – First Name | Υ | Both | |
| 10.1.3 | Occupan t Middle Name | VARCHAR2(1 5) | Update Occupant – Middle Initial | Υ | Both | |
| 10.1.4 | Occupan t Relation ship Type Code | VARCHAR2(1 5) | Update Occupant – Relationship | Y | Both | We need the codes |
| 10.1.5 | Occupan t Social Security Number | CHAR(9) | Update Occupant – Social Security | Υ | Both | |
| 10.1.6 | Occupan t Age | NUMBER(3) | Update Occupant - Age | Υ | Both | |
| 10.2.1 | Self Employe d Flag | CHAR(1) | Business Damages – Self Employment – Y/N | Y | Both | |
| 10.2.2 | Business Damage Flag | CHAR(1) | Business Damages – Own affected – Y/N | Υ | Both | |
| 11.1.1 | Number of Depende nts | NUMBER(2) | Financial Info – Number of Dependents | Y | Both | |
| 11.1.2 | Pre- disaster gross income | NUMBER(8) | Financial Info - Pre-disaster gross income | Υ | Both | |
| 11.1.3 | EFT Participa te Type Code | CHAR(1) | Financial Info – Electronic Transfer – Y/N | N | | |
| 11.2.1 | EFT Financial Instituti | VARCHAR2(2 5) | EFT – Bank Name | N | | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 18 of 21

| IAC Data Element | Name of Elemen t | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|---------------------|--------------------------------|------------------|-------------------------|------------|---|----------|
| | on Name | | | | | |
| 11.2.2 | EFT Account Type Code | CHAR(1) | EFT – Account Type | N | | |
| 11.2.3 | EFT Transit Number | CHAR(8) | EFT – Routing Number | N | | |
| 11.2.4 | EFT Account Number | VARCHAR2(2 0) | EFT – Account Number | N | | |

SBA Additional Data Elements:

Identified below are data elements from the RI application that are already be part of the current data exchange with SBA but are not captured from the online interface. The purpose of this section is to confirm your need to have these fields sent to your application. Please use the Comments column to indicate any changes to data type or format that is required.

Table A.1: IAC Additional Data Elements

| IAC Data | Name of Element | Data Type | Description of Element | Required ? | Should this be | Comments |
|-------------|--------------------------------|--------------|--------------------------------|------------|--|-------------------------------|
| Eleme nt | | | | | updatable in IAC, Own System or Both? | |
| 12.1 | Disaster Number | Number(5) | FEMA Disaster Number | Y | Both | |
| 12.2 | Registrati on Identifier | Number(16) | FEMA Registration Number | Y | Both | |
| 12.3 | Language Code | Varchar2(16) | | Y | Both | |
| 12.5 | Business Name | Varchar2(50) | | Y | Both | Not currently captured in IAC |



Privacy Threshold Analysis Version date: June 10, 2010 Page 19 of 21

| IAC Data Eleme nt | Name of Element | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|----------------------------|--------------------------------------|-----------|---|------------|---|----------|
| 12.6 | Applied Date | Date | Date of Registration with FEMA | Y | Both | |
| 12.7 | Package Already Mailed Flag | Char(1) | Indicates if applicant already had information packet | Y | Both | |
| 12.8 | SBA Special Handling Flag | Char(3) | Identifies possible rentals and business apps | Y | Both | |
| 13.1 | NFIRA Required Flag | Char(1) | Indicates that there is a NFIRA maintenance requirement on the property based on HS interpretation of NFIRA | Y | Both | |
| 13.2 | NFIRA Maintaine d Flag | Char(1) | Not used at this time | Y | Both | |
| 13.3 | NFIRA Prior Restricted Flag | Char(1) | Not used at this time | Υ | Both | |
| 13.4 | NFIRA Verificati on Flag | Char(1) | Indicates that the check against the NFIRA database has been performed | Y | Both | |
| 13.5 | NFIRA In Complian ce Flag | Char(1) | Indicates that the applicant has an active NFIP policy that keeps him/her in compliance with NFIRA based on HS interpretation of NFIRA. | Y | Both | |
| 13.6 | NFIP Active Flag | Char(1) | Indicates that there is an active NFIP policy on the address | Y | Both | |
| 14.1 | Flood Zone | Char(2) | Flood zone of damaged dwelling | Y | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 20 of 21

| IAC Data Eleme nt | Name of Element | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|----------------------------|----------------------------------|--------------|--|------------|---|--|
| 14.2 | Source Type Code | Varchar2(16) | Source of flood plain mapping information | Υ | Both | Code Validation (A = Automatic, M=Manual) - Not implemented yet |
| 14.3 | Sanction Communit y Flag | Char(1) | Indicates if the damaged dwelling is in a Sanctioned Community | Υ | Both | |
| 14.4 | Sanction Communit y Number | Number (10) | The SC number as identified by FIA | Υ | Both | |
| 14.5 | Panel Number | Number(5) | Panel Number of the applicable flood map | Υ | Both | |
| 14.6 | Effective Date | Date | Effective date of the flood map used to determine flood plain mapping information | Y | Both | |
| 14.7 | CBRA Mapping | Char(1) | Indicates whether the damaged dwelling is located in a county that contains a CBRA Zone and therefore requires a mapping to determine if it is located within the CBRA zone. | Y | Both | |
| 14.8 | Damaged Dwelling in CBRA | Char(1) | Indicates if the damaged dwelling is in a CBRA zone based on a flood plain mapping | Υ | Both | |
| 14.9 | Flood Zone Request | Date | Indicates if the damaged dwelling is in a CBRA zone based on a flood plain mapping | Y | Both | |
| 15.1 | HAPP Flag | Char(1) | 'Y' indicates create the home pre- docketing data set. (LCSDKFL | Υ | Both | |
| 15.2 | BAPP Flag | Char(1) | 'Y' indicates create the BUSINESS pre- docketing data set. (LCSDKFL data file) | Υ | Both | |



Privacy Threshold Analysis Version date: June 10, 2010 Page 21 of 21

SSA Additional Data Elements:

Table A.3: IAC Additional Data Elements

| IAC Data Eleme nt | Name of Element | Data Type | Description of Element | Required ? | Should this be updatable in IAC, Own System or Both? | Comments |
|----------------------------|-----------------------------|-----------|-------------------------------|------------|---|---|
| 1 | Change Effective Date | Date | Immediate or as of month/year | Y | | Format (mm/dd/yyyy) Cannot be greater than 90 days out |
| 2 | Phone Type | CHAR(1) | Type of Phone | N | | Must be able to capture additional phone types such as: • H = Home • W = Work A = Attorney O = Other D = Do Not HAVE PHONE |