

Privacy Threshold Analysis Version date: November 6, 2012 Page 1 of 8

#### 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
Senior Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

# PIA@dhs.gov

Upon receipt from your 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: 202-343-1717.



Privacy Threshold Analysis Version date: November 6, 2012

Page 2 of 8

# PRIVACY THRESHOLD ANALYSIS (PTA)

# **SUMMARY INFORMATION**

Project or Program Name:	1660-0061 Federal Assistance to Individuals and Households Programs			
Component:	Federal Emergency Management Agency (FEMA)  Office or Program:  Individuals and Households Branch			
TAFISMA Name:		TAFISMA Number:	Click here to enter text.	
Type of Project or Program:	Form or other Information Collection	Project or program status:	Modification	

# PROJECT OR PROGRAM MANAGER

Name:	John Carleton		
Office:	Individuals and Households Branch  Title:  Bra		Branch Chief
Phone:	202-212-1162	Email:	John.carleton@fema.dhs.gov

# INFORMATION SYSTEM SECURITY OFFICER (ISSO)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

# **ROUTING INFORMATION**

Date submitted to Component Privacy Office:	August 20, 2013
Date submitted to DHS Privacy Office:	August 21, 2013
Date approved by DHS Privacy Office:	October 21, 2013



Privacy Threshold Analysis Version date: November 6, 2012 Page 3 of 8

### SPECIFIC PTA QUESTIONS

### 1. Please describe the purpose of the project or program:

Please provide a general description of the project and its purpose in a way a non-technical person could understand.

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 survivors the opportunity to request approval of late applications, continued assistance, and appeal program decisions and, 2) States/Indian Tribal governments 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.

Additionally, in 2013, the President signed into law the Sandy Recovery Improvement Act of 2013 (SRIA), Pub. L. No. 113-2, amending the Stafford Act. This collection accounts for changes to the Stafford Act; specifically the ability of Indian Tribes to work directly with FEMA as a sovereign nation and the addition of child care (Section 1108) as an eligible disaster expense under the IHP.

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 Spanish via FEMA Form 010-0-12S "Solicitud para Continuar la Asistencia de Vivienda Temporera"), 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/Indian Tribal government 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/Indian Tribal government'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/Indian Tribal government will use the agreement for planning and developing program implementation procedures to be used during the next calendar year in the



Privacy Threshold Analysis Version date: November 6, 2012 Page 4 of 8

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implementation of programs under Section 408 of the Stafford Act.			
2. Project or Progr	ram status	Existing	
Date first developed:	March 3, 2003	Pilot launch date:	Click here to enter a date.
Date last updated:	August 20, 2013	Pilot end date:	Click here to enter a date.
		☐ DHS Employees	
3. From whom doe Program collect	· ·	☐ Contractors working on behalf of DHS	
Program collect, maintain, use or disseminate information?  Please check all that apply.			
		☐ This program does not collect any personally identifiable information¹	
_	description of information	duals could be collected, ge on that might be collected, go	
Individuals:			
	Applicant Name (First, L at Physical Address(es) (N	•	
* *	nt Physical Address(es) (N nt Disaster Registration N	,	
	nt Phone Number(s) (inclu		
1 1	* * *	Utility/Mortgage bills and p	ayment history)
		information (Information for	

States/Indian Tribal governments:

Resident(s) Income Information (including paystubs and other income documentation)

landlord contact information and cancelled checks)

Resident(s) Name (First, Last, and Middle)

Applicant (Co-Applicant) Signature

<sup>&</sup>lt;sup>1</sup> DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that 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. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



Privacy Threshold Analysis Version date: November 6, 2012

Page 5 of 8

<ul> <li>State Governor or Designee Signature</li> <li>Indian Tribal government Chief Exc</li> <li>FEMA Employee Signature</li> </ul>	
Does the Project or Program use Social Security Numbers (SSNs)?	No
If yes, please provide the legal authority for the collection of SSNs:	Click here to enter text.
If yes, please describe the uses of the SSNs within the Project or Program:	Click here to enter text.
5. Does this system employ any of the following technologies:	Closed Circuit Television (CCTV)
If f d	☐ Sharepoint-as-a-Service
If project or program utilizes any of these technologies, please contact Component Privacy	Social Media
Officer for specialized PTA.	☐ Mobile Application (or GPS)
	☐ Web portal <sup>2</sup>
	None of the above     None of the above
If this project is a technology/system, does it relate solely to infrastructure?	No. Please continue to next question.
For example, is the system a Local Area Network	Yes. If a log kept of communication traffic,
(LAN) or Wide Area Network (WAN)?	please answer the following question.
If header or payload data <sup>3</sup> is stored in the corelements stored.	nmunication traffic log, please detail the data
Click here to enter text.	

<sup>&</sup>lt;sup>2</sup> Informational and collaboration-based portals in operation at DHS and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or who seek to gain access to the portal "potential members."

<sup>&</sup>lt;sup>3</sup> When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.



Privacy Threshold Analysis Version date: November 6, 2012 Page 6 of 8

6. Does this project or program connect, receive, or share PII with any other DHS programs or systems <sup>4</sup> ?	<ul> <li>No.</li> <li>         ∑ Yes. If yes, please list:     </li> <li>Disaster Assistance Improvement Program (DAIP) and Document Management and Records Tracking System (DMARTS)</li> </ul>
7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?	<ul><li>No.</li><li>☐ Yes. If yes, please list:</li><li>Click here to enter text.</li></ul>
Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Choose an item.  Please describe applicable information sharing governance in place.  Click here to enter text.

 $<sup>^4</sup>$  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.



Privacy Threshold Analysis Version date: November 6, 2012

Page 7 of 8

# PRIVACY THRESHOLD REVIEW

# (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	Lane Raffray	
Date submitted to DHS Privacy Office:	August 21, 2013	
Component Privacy Office Recommendation:		
Please include recommendation below, including what new privacy compliance documentation is needed.		
PIA: DHS/FEMA/PIA-012 Disaster Assistance Improvement Plan (DAIP) and DHS/FEMA/PIA-009		
Document Management and Records Tracking System (DMARTS)		
SORN: DHS/FEMA 008 Disaster Recovery Assistance Files		

# (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jameson Morgan
Date approved by DHS Privacy Office:	October 21, 2013
PCTS Workflow Number:	992262

# **DESIGNATION**

Privacy Sensitive System:		Yes If "no" PTA adjudication is complete.
Category of System:		IT System
		If "other" is selected, please describe: Click here to enter text.
<b>Determination:</b> PTA sufficient at this time.		ufficient at this time.
	Privac	y compliance documentation determination in progress.
	☐ New in	nformation sharing arrangement is required.
☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.		Policy for Computer-Readable Extracts Containing Sensitive PII
	□ Privac	y Act Statement required.
Privacy Impact Assessment (PIA) required.		y Impact Assessment (PIA) required.
	⊠ System	n of Records Notice (SORN) required.
	System covered by e	xisting PIA; PIA Appendix Update Required
PIA:	If covered by existing	g PIA, please list: DHS/FEMA/PIA-012(a) - Disaster Assistance
Improvement Plan (DAIP) Disaster Assistance Improvement Program (DAIP)		DAIP) <u>Disaster Assistance Improvement Program (DAIP)</u>



Privacy Threshold Analysis Version date: November 6, 2012

Page 8 of 8

	November 16, 2012 (PDF, 27 pages-384 KB); DHS/FEMA/PIA-009(a) - Document					
	Management and Records Tracking System (DMARTS) Privacy PIA FEMA DMARTS					
	System covered by existing SORN					
SORN:	If covered by existing SORN, please list: <u>DHS/FEMA-008 - Disaster Recovery Assistance</u>					
	<u>Files</u>					

#### **DHS Privacy Office Comments:**

Please describe rationale for privacy compliance determination above.

The DHS Privacy Office agrees with the FEMA Privacy Office's recommendation requiring coverage under the DHS/FEMA/PIA-012(a) Disaster Assistance Improvement Plan (DAIP) and DHS/FEMA/PIA-009 Document Management and Records Tracking System (DMARTS), as well as the DHS/FEMA 008 Disaster Recovery Assistance Files SORN. Both PIAs are required to have their respective appendices updated to reflect coverage of this program. A Privacy Act Statement is also required for the forms used by the Federal Assistance to Individuals and Households Program (IHP).

This program collects information from members of the public in order to allow disaster survivors to request approval of late applications, continued assistance, and appeal program decisions. The program also allows States/Indian Tribal governments with a better opportunity to be active participants in the "Other Needs" provision of the IHP. In addition, this program also collects information relevant to the addition of child care (Section 1108) as an eligible disaster expense under the IHP.

The DHS/FEMA - 008 Disaster Recovery Assistance Files SORN allows for information collection from members of the public in a variety of instances including: individuals seeking disaster assistance from FEMA, for the verification of IHP applicant information, and in order to determine eligibility of applicants. All categories of records, categories of individuals, and routine uses of the information collected in the program are consistent with the DHS/FEMA - 008 SORN.

The DHS/FEMA/PIA-012(a) DAIP PIA provides coverage for collection of information related to disaster survivor application and registration information collected through various media including: (1) DAIP paper forms (attached at Appendix A), (2) the www.disasterassistance.gov website, (3) the http://m.fema.gov mobile website, and (4) via telephone. This PIA covers the collection of information from members of the public by the Federal Assistance to Individuals and Households Program. The DHS/FEMA/PIA-008 DMARTS PIA covers the storage, retrieval, and dissemination of information about individuals applying for disaster assistance in the Document Management and Records Tracking System (DMARTS). Both PIAs have appendices that are required to be updated to reflect coverage of this program. A Privacy Act Statement is also required for the forms being used by this program since the information is being stored in a system of record.