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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
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.



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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	FEMA 1660-0002 Disaster Assistance Registration			
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Click here to enter text.	
TAFISMA Name:	Click here to enter text.	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:	Elizabeth McDowell		
Office:	ORR - Recovery	Title:	Lead Program Specialist
Phone:	540.686.3630	Email:	Elizabeth.McDowell@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:	October 23, 2013
Date approved by DHS Privacy Office:	October 28, 2013



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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.

The Federal Emergency Management Agency provides financial needs and services to individuals who apply for disaster assistance benefits in the event of a federal declared disaster, in accordance with the Robert T Stafford Disaster Relief and Emergency Act, as amended, 42 U.S.C. § 5174. FEMA implements the policies and procedures of this provision under 44 C.F.R. § 206.110 et seq. FEMA provides financial assistance and, if necessary, direct assistance to eligible individuals and households who, as a direct result of a major disaster or emergency, have uninsured or under-insured, necessary expenses and serious needs and are unable to meet such expense or needs through other means. Individuals and households that apply for this assistance must provide information detailing their losses and needs.

Through its ICR 1660-0002, FEMA collects personally identifiable information (PII) and other information from registrants to facilitate the provision of the assistance noted above. FEMA collects this PII through a variety of media including paper forms (009-0-1 and 009-0-2, 009-0-3, 009-0-4, 009-0-5 and 009-0-6), via telephone, and the www.disasterassistance.gov website, and its smartphone application.

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.

2. Project or Program status		Choose an item.	
Date first developed:	July 1, 2006	Pilot launch date:	Click here to enter a date.
Date last updated:	August 20, 2013	Pilot end date:	Click here to enter a date.
3. From whom does the Project or Program collect, maintain, use or disseminate information? Please check all that apply.		☐ DHS Employees ☐ Contractors working on behalf of DHS	
		 ✓ Members of the public ☐ This program does not collect any personally identifiable information¹ 	

¹ 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



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4. What specific information about individuals could be collected, generated or retained? Please provide a specific description of information that might be collected, generated or retained such as names, addresses, emails, etc.		
The registrant and/or household members name, damaged dwelling address, current mailing address, current phone number, alternate phone number, cell phone number, birth date, Social Security Number, household income, banking information (bank name, bank account information), insurance information, residence type, vehicle information, and email address.		
Does the Project or Program use Social Security Numbers (SSNs)?	Yes	
If yes, please provide the legal authority for the collection of SSNs:	Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c)(1).	
If yes, please describe the uses of the SSNs within the Project or Program:	SSN is to facilitate payment of disaster assistance, verify/validate identity, prevent a duplication of benefits and the recoupment of any potential debt or overpayment.	
5. Does this system employ any of the following technologies:	Closed Circuit Television (CCTV)	
	☐ 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 ²	
	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 (LAN) or Wide Area Network (WAN)?	Yes. If a log kept of communication traffic, please answer the following question.	

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.

² Informational and collaboration-based portals in operation at DHS and its components which collect, use,

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."



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If header or payload data ³ is stored in the communication traffic log, please detail the data elements stored. Click here to enter text.		
r	Does this project or program connect, receive, or share PII with any other DHS programs or systems ⁴ ?	 No. ✓ Yes. Individual Assistance (IA); Disaster Assistance Improvement Program (DAIP); Document Management and Records Tracking System (DMARTS); Automated Construction Estimating (ACE) System Click here to enter text.
r	Does this project or program connect, receive, or share PII with any external non-DHS) partners or systems?	No.☐ Yes. If yes, please list:Click here to enter text.
0	s this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Existing FEMA has an existing Computer Matching Agreement with the Small Business Administration. Click here to enter text.

³ 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.

⁴ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes.

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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Lane Raffray	
Date submitted to DHS Privacy Office:	Click here to enter a date.	
Component Privacy Office Recommendation:		
Please include recommendation below, including what new privacy compliance documentation is needed.		
PIA: DHS/FEMA/PIA - 012a Disaster Assistance Improvement Program (DIAP), DHS/FEMA/PIA –		
009(a) 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 28, 2013
PCTS Workflow Number:	997849

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 tout
		If "other" is selected, please describe: Click here to enter text.
Determinat	tion: PTA s	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.		
	Privacy Act Statement required.	
Privacy Impact Assessment (PIA) required.		
System of Records Notice (SORN) required.		
System covered by existing PIA		
PIA: If covered by existing PIA, please list: DHS/FEMA/PIA – 009(a) Document Management (DNA) PIA (DNA) (DNA		
and Records Tracking System (DMARTS), May 15, 2013, (PDF, 18 pages-283KB); DHS/FEMA/PIA – 12(a) Disaster Assistance Improvement Program (DAIP) November		



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	2012 (PDF, 27 pages-384 KB).
	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 that this The Disaster Assistance Registration PTA should receive coverage under the DHS/FEMA/PIA – 012a Disaster Assistance Improvement Program (DIAP) PIA, the DHS/FEMA/PIA – 009(a) Document Management and Records Tracking System (DMARTS), and the DHS/FEMA - 008 Disaster Recovery Assistance Files SORN.

This program collects information from members of the public in order to facilitate the provision of financial assistance to members of the public affected by the result of a disaster or emergency. This information collection directly supports FEMA's mission of providing assistance to people that are uninsured or under-insured, and who have serious needs and are unable to meet such expense or needs through other means. This PTA is being submitted to account 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.

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-009(a) 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). The appendices of the DHS/FEMA/PIA - 009(a) DMARTS PIA and the DHS/FEMA/PIA – 012(a) do not need to be updated because all of the forms used by Disaster Assistance Registration are listed in both PIAs.

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. If this program changes a new PTA should be submitted.