



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 (PTA)

SUMMARY INFORMATION

Project or Program Name:	Request for Site Inspection/Landowners Authorization/Ingress/Egress Agreement (1660-0030)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Individual Assistance Division
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:	Update

PROJECT OR PROGRAM MANAGER

Name:	Johnathan Torres		
Office:	Individual Assistance	Title:	Sr. Program Specialist
Phone:	202-212-1079	Email:	Johnathan.Torres@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:	July 16, 2013
Date submitted to DHS Privacy Office:	October 25, 2013
Date approved by DHS Privacy Office:	November 6, 2013



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 Landowner's Authorization Ingress-Egress Agreement, FEMA FORM 010-0-10, authorizes the Federal government to place a manufactured (or similar) housing unit on the landowner's property in response to applicant's eligibility at the federally declared disaster where direct housing is authorized. This agreement is necessary before any direct housing assistance can be physically assessed and placed at the landowner's property. It only occurs when the disaster applicant (typically the landowner) applies and is eligible for direct housing assistance (manufactured/factory built housing).

This form collects personally identifiable information from the disaster survivor as part of this information collection.

2. Project or Program status

Choose an item.

Date first developed:	November 1, 2010	Pilot launch date:	Click here to enter a date.
Date last updated:	November 1, 2010	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

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.

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 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.



Applicant name, Applicant address, applicant phone number, applicant FEMA registration number, site information (if different from the applicant address), Witness signature, applicant signature, site owner/agent signature.	
From DHS employees/contractors: name and signature.	
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.

<p>5. Does this system employ any of the following technologies:</p> <p><i>If project or program utilizes any of these technologies, please contact Component Privacy Officer for specialized PTA.</i></p>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Sharepoint-as-a-Service <input type="checkbox"/> Social Media <input type="checkbox"/> Mobile Application (or GPS) <input type="checkbox"/> Web portal ² <input checked="" type="checkbox"/> None of the above
<p>If this project is a technology/system, does it relate solely to infrastructure?</p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
<p>If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
Click here to enter text.	

² 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.”

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.



<p>6. Does this project or program connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list: Individual Assistance (formerly NEMIS-IA) HOMES module</p>
<p>7. Does this project or program connect, receive, or share PII with any external (non-DHS) partners or systems?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</p>	<p>Choose an item.</p> <p>Please describe applicable information sharing governance in place. Click here to enter text.</p>

⁴ 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 REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Lane Raffray
Date submitted to DHS Privacy Office:	October 25, 2013
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: Individual Assistance (Formerly NEMIS-IA)	
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:	November 6, 2013
PCTS Workflow Number:	998389

DESIGNATION

Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Other If "other" is selected, please describe: Form or other Information Collection
Determination:	<input type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input checked="" type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required.
PIA:	PIA update is required. The DHS/FEMA/PIA – 027 PIA is currently being updated. If covered by existing PIA, please list: DHS/FEMA/PIA – 027 National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules ,



SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-008 - Disaster Recovery Assistance Files
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office agrees with the FEMA Privacy Office’s recommendation that the Request for Site Inspection/Landowners Authorization/Ingress/Egress Agreement form is a privacy sensitive system with coverage required under the DHS/FEMA/PIA – 027 NEMIS-IA PIA and the DHS/FEMA – 008 Disaster Recovery Assistance Files SORN. A Privacy Act Statement is also required for this system.</p> <p>This form collects PII from members of the public seeking direct housing assistance from FEMA. Members of the public must provide this information in order to apply for and obtain this assistance before the site can be physically assessed and before housing can be placed at the landowner’s property.</p> <p>The DHS/FEMA/PIA – 027 NEMIS-IA PIA is currently being updated to support a number of DHS systems and process. However, the purpose of the PIA is to allow FEMA to collect and process information obtained from disaster recovery assistance applications via the Disaster Assistance Improvement Program (DAIP)/Disaster Assistance Call Center (DAC) system. This form will be covered under the newest version of the NEMIS-IA PIA when it is published.</p> <p>The DHS/FEMA – 008 Disaster Recovery Assistance Files SORN provides coverage to information collected by this form in order to register applicants seeking disaster assistance from FEMA, determine eligibility of the applicants, and to inspect damaged property. The information collection by this form is consistent with the purpose, categories of records, categories of individuals, and the routine uses within this SORN.</p> <p>Per the Privacy Act of 1974, a Privacy Act Statement is also required to be provided to individuals who fill out this form since they are members of the public who will have information stored in a DHS system of records. A new PTA is required to be submitted on November 7th, 2014 to reflect coverage under the updated NEMIS-IA PIA.</p>	