



## **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:

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

PIA@hq.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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	<b>Direct Housing Program Forms (1660-NW90)</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office or Program:</b>	Office of Response & Recovery (ORR) - Individual Assistance Division (IAD)
<b>Xacta FISMA Name (if applicable):</b>	Click here to enter text.	<b>Xacta FISMA Number (if applicable):</b>	Click here to enter text.
<b>Type of Project or Program:</b>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Operational</b>
<b>Date first developed:</b>	<b>August 1, 2013</b>	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date of last PTA update</b>	NA	<b>Pilot end date:</b>	Click here to enter a date.
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	Click here to enter a date.

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Elizabeth McDowell		
<b>Office:</b>	<b>FEMA Individual Assistance</b>	<b>Title:</b>	Lead Program Specialist
<b>Phone:</b>	<b>540-686-3630</b>	<b>Email:</b>	Elizabeth.McDowell@fema.dhs.gov

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<b>Name:</b>	Click here to enter text.		
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	Click here to enter text.



## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: New PTA

The Federal Emergency Management Agency provides financial needs and services to individuals and households who apply for disaster benefits in the event of a federal declared disaster, in accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288, as amended (the Stafford Act), collected at 42 U.S. 5121 et seq. Section 408 of the Stafford Act (42 U.S.C. § 5174) authorizes FEMA to provide direct housing assistance, directly to individuals or households, who, as a result of a major disaster, lack of available housing resources and would be unable to make use of financial assistance. FEMA provides temporary housing units in the form of a manufactured home or other readily fabricated dwellings.

FEMA is creating this new information collection request to support the direct housing operation. FEMA will use the information collected to determine available pad sites for potential park owners/managers; to calculate the final sales prices of manufactured housing units (MHU) when FEMA activates the Sales Program; to act as an acknowledgement of conditions of sale, which is used to execute the sale of MHUs; to serve as the programmatic point of transfer between the Logistics Management Directorate Manufactured Housing Unit and Individual Assistance Direct Housing Operations Unit; to record an occupant's compliance with requirements for direct temporary housing assistance; and to record an occupant's agreement to occupy the Temporary Housing Unit (THU).

Information is collected via paper forms then uploaded into the Individual Assistance (IA) IT system, which maintains the information on the Individual and Households Program. FEMA staff enters the information into the Housing Operations Management Enterprise Systems (HOMES) database that is used to coordinate the Direct Housing Assistance for disaster survivors. Under this information collection, FEMA will collect information from members of the public, owners/managers of the properties hosting MHUs, as well as IHP applicants in the THUs.

### 2. Does this system employ any of the following technologies:

*If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.*

- Closed Circuit Television (CCTV)
- Social Media
- Web portal<sup>1</sup> (e.g., SharePoint)
- Contact Lists
- None of these

### 3. From whom does the Project or Program collect, maintain, use, or

- This program does not collect any personally identifiable information<sup>2</sup>

<sup>1</sup> Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.



<p><b>disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Members of the public</p> <p><input checked="" type="checkbox"/> DHS employees/contractors (list components): FEMA</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p> <p><input type="checkbox"/> Employees of other federal agencies</p>
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**4. What specific information about individuals is collected, generated or retained?**

From FEMA employees/contractors:  
Name, Signature, Phone number

From IA applicants:  
Name, Signature, Registration ID #, Address, County, Phone number, Household member name, Relationship status, Age, Sex

From other individuals:  
Name, Title, Signature (as a witness, as on FF 09-0-135; or as certification on FF 009-0-137)

<p><b>4(a) Does the project, program, or system retrieve information by personal identifier?</b></p>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Registration ID and Name</p>
<p><b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes.</p>
<p><b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b></p>	<p>Click here to enter text.</p>
<p><b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>Click here to enter text.</p>
<p><b>4(e) If this project, program, or system is an information technology/system, does it</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p>

<sup>2</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.



<p><b>relate solely to infrastructure?</b></p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
<p><b>4(f) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b></p>	
<p>Click here to enter text.</p>	

<p><b>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b></p>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list:  IA (formerly called NEMIS-IA)
<p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b></p>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b></p>	<p>Choose an item.</p> <p>Please describe applicable information sharing governance in place: N/A</p>
<p><b>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</b></p>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
<p><b>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have</b></p>	<input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input checked="" type="checkbox"/> Yes. In what format is the accounting

<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.

<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 Xacta.



<b>requested access to their PII?</b>	maintained: The FEMA Disclosure Office maintains accounting of PII disclosures and requests.
<b>9. Is there a FIPS 199 determination?<sup>4</sup></b>	<input checked="" type="checkbox"/> Unknown. <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:  Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined

### PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	Lane Raffray
<b>Date submitted to Component Privacy Office:</b>	January 5, 2015
<b>Date submitted to DHS Privacy Office:</b>	April 28, 2015
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
PIA: DHS/FEMA/PIA-027 – National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules SORN: DHS/FEMA-008 - Disaster Recovery Assistance Files (April 30, 2013, 78 FR 25282)	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	Eric M. Leckey
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<sup>4</sup> FIPS 199 is the [Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.



<b>PCTS Workflow Number:</b>	<b>1083217</b>
<b>Date approved by DHS Privacy Office:</b>	April 30, 2015
<b>PTA Expiration Date</b>	April 30, 2018

### DESIGNATION

<b>Privacy Sensitive System:</b>	Yes If “no” PTA adjudication is complete.
<b>Category of System:</b>	Form/Information Collection If “other” is selected, please describe: Click here to enter text.
<b>Determination:</b>	<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. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.
<b>PIA:</b>	System covered by existing PIA 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
<b>SORN:</b>	System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-008 - Disaster Recovery Assistance Files (April 30, 2013, 78 FR 25282)
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
FEMA’s 1660-NW90 is a new information collection to support its direct housing operation, which is part of its Individual Assistance program. FEMA has drafted a new e3 Privacy Act Statement to adhere to the forms used in this ICR. The PTA notes that the information FEMA collects under this ICR is entered into the HOMES module of the Individual Assistance (formerly NEMIS-IA) IT system. As such, this information should be covered within the IA PIA, which is due for an update this year.	



# Homeland Security

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, pia@dhs.gov  
www.dhs.gov/privacy

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FEMA should ensure that this ICR and its relevant details (e.g. individuals, data elements collected, sharing, etc.) are represented in the new IA PIA.

Furthermore, the DHS/FEMA 008 SORN that covers IA records is due for a biennial review this year as well. Here again, FEMA should ensure that any new categories of records created by this ICR are included in the updated SORN. FEMA should review the routine uses of the SORN to ensure that the sharing of information collected through this ICR is covered under the DHS/FEMA 008 SORN.