



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, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Manufactured Housing Operations Forms (1660-0030)		
Component:	Federal Emergency Management Agency (FEMA)	Office or Program:	Office of Response & Recovery (ORR) – Recovery - Individual Assistance Division
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Operational
Date first developed:	November 1, 2010	Pilot launch date:	Click here to enter a date.
Date of last PTA update	November 6, 2013	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Elizabeth McDowell		
Office:	FEMA – Individual Assistance	Title:	Lead Program Specialist
Phone:	540-686-3630	Email:	Elizabeth.Mcdowell@fema.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

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



SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal 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 Act, as amended, 42 U.S.C. § 5174. Section 408 of 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., 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 will provide temporary housing units in the form of a manufactured home or other readily fabricated dwellings.

The information collection request (ICR) 1660-0030 is to support the direct housing operation. The information collected is used to determine if the feasibility of a potential site for Temporary Housing Units (THUs) and to ensure the landowner, if other than the will allow for a Mobile Housing Unit (MHU) to be placed on the property. This information is collected via paper forms then uploaded into the Individual Assistance (formerly NEMIS-IA) IT system, which maintains Individual and Households Program information. The information is entered into the Housing Operations Management Enterprise Systems (HOMES) database (within IA) that is used to coordinate the provision of THUs for disaster survivors. Under this ICR, FEMA will collect information from members of the public (owners/managers of the properties hosting MHUs and IHP applicants in need of THUs).

Previously approved forms

- a. FEMA Form 010-0-9 (formerly 90-1), Request for Site Inspection – is used by FEMA to ensure the feasibility of potential sites for temporary housing units. This form will also provide FEMA with the ability to determine whether these sites will accommodate a temporary housing unit, and comply with local, State and Federal guidelines and regulations regarding the placement of the unit. The form documents that the necessary infrastructure required to support a temporary housing unit is in place.
- b. FEMA Form 010-0-10 (formerly 90-31), Landowner’s Authorization Ingress / Egress Agreement – is used by FEMA to ensure a landowner, if other than the applicant receiving the unit, will allow the unit to be placed on the property. This form also verifies that routes of ingress and egress to and from the property are maintained, that necessary actions to make ingress and egress possible are documented for completion, and that FEMA has a 30-day timeframe upon termination of the temporary housing agreement to facilitate removal.

Additional forms (change to ICR)

- c. FEMA Form 009-0-138 (formerly 90-13), Manufactured Housing Unit Inspection Report- is used by FEMA to document the condition of the unit and contents during each transaction that occurs for temporary housing. This form is intended to be used anytime a manufactured housing unit (HUD or other) is transferred in the property transfer system of record, the Housing Operations Management Enterprise System (HOMES), including delivery to and receipt from the disaster survivor.
- d. FEMA Form 009-0-136 (formerly 90-26), Unit Installation Work Order - is used to issue and track individual work orders against a contract for installing Manufactured Housing Units.



e. FEMA Form 009-0-130 (formerly 90-38), Maintenance Work Order - is used to initiate work (cost incurred to the government), in particular perform maintenance on a manufactured housing unit (HUD or otherwise).

<p>2. Does this system employ any of the following technologies: <i>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.</i></p>	<p><input type="checkbox"/> Closed Circuit Television (CCTV)</p> <p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Web portal¹ (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input checked="" type="checkbox"/> None of these</p>
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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program does not collect any personally identifiable information²</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> DHS employees/contractors (list components):</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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<p>4. What specific information about individuals is collected, generated or retained?</p>
<p>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.</p>

¹ 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.

² 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>4(a) Does the project, program, or system retrieve information by personal identifier?</p>	<p><input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Name, registration ID</p>
<p>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.</p>
<p>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</p>	<p>Click here to enter text.</p>
<p>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>Click here to enter text.</p>
<p>4(e) If this project, program, or system is an information 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>	<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>
<p>4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>Click here to enter text.</p>	

<p>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI,</p>	<p>Choose an item. Please describe applicable information sharing</p>

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. Often, these systems are listed as “interconnected systems” in Xacta.



etc.)?	governance in place:
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?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
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 requested access to their PII?	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?⁴	<input type="checkbox"/> Unknown. <input checked="" 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)

Component Privacy Office Reviewer:	Lane Raffray
Date submitted to Component Privacy Office:	February 24, 2015
Date submitted to DHS Privacy Office:	April 28, 2015
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	

⁴ 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.



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PIA: DHS/FEMA/PIA-027 – National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules (Will be re-named IA when it is updated.)
SORN: DHS/FEMA 008 Disaster Recovery Assistance Files

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Eric M. Leckey
PCTS Workflow Number:	1083215
Date approved by DHS Privacy Office:	April 30, 2015
PTA Expiration Date	April 30, 2018

DESIGNATION

Privacy Sensitive System:	Yes If “no” PTA adjudication is complete.
Category of System:	Form/Information Collection If “other” is selected, please describe: Click here to enter text.
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. <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.
PIA:	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
SORN:	System covered by existing SORN



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	If covered by existing SORN, please list: DHS/FEMA-008 - Disaster Recovery Assistance Files April 30, 2013 78 FR 25282
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
FEMA's ICR 1660-0030 collects information from applicants of FEMA's Individual Assistance program to assist in the provision of housing benefits. This PTA represents a renewal of the existing ICR, with the addition of two forms. FEMA's IA programs are covered by the DHS/FEMA-008 - Disaster Recovery Assistance Files (April 30, 2013, 78 FR 25282) SORN, which is currently due for a biennial review. The SORN includes broad categories of records covering inspection reports and associated documents; however FEMA should review the SORN to ensure proper coverage of this ICR. The housing related information may be stored, maintained, or processed through FEMA's Individual Assistance (formerly NEMIS-IA) IT system, which is covered by the DHS/FEMA/PIA-027 - National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules PIA. The PIA is due for its renewal, and FEMA should ensure that any new information that may now be processed through IA as a result of this ICR is noted in the new IA PIA.	