



## PRIVACY THRESHOLD ANALYSIS (PTA)

**This form serves as the official determination by the DHS Privacy Office to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).**

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals as determined by the Chief Privacy Officer, pursuant to Section 222 of the Homeland Security Act, and to assess whether there is a need for additional Privacy Compliance Documentation. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used and managed.

Please complete the attached Privacy Threshold Analysis and submit it to your component Privacy Office. After review by your component Privacy Officer the PTA is sent to the Department's Senior Director for Privacy Compliance for action. 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](mailto:PIA@hq.dhs.gov)

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement, or Computer Matching Agreement (CMA) – the DHS Privacy Office or component Privacy Office will send you a copy of the relevant compliance template to complete and return.



## Privacy Threshold Analysis (PTA)

### *Specialized Template for Information Collections (IC) and Forms*

The Forms-PTA is a specialized template for Information Collections and Forms. This specialized PTA must accompany all Information Collections submitted as part of the Paperwork Reduction Act process (any instrument for collection (form, survey, questionnaire, etc.) from ten or more members of the public). Components may use this PTA to assess internal, component-specific forms as well.

<b>Form Number:</b>	<b>FEMA Form (FF) 000-0-0</b>		
<b>Form Title:</b>	<b>IHP Occupancy &amp; Ownership Verification</b>		
<b>Component:</b>	Federal Emergency Management Agency (FEMA)	<b>Office:</b>	<b>Office of Response and Recovery (ORR)</b>

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

<b>Collection Title:</b>	<b>Disaster Assistance Registration</b>		
<b>OMB Control Number:</b>	1660-0002	<b>OMB Expiration Date:</b>	August 31, 2024
<b>Collection status:</b>	Revision	<b>Date of last PTA (if applicable):</b>	<a href="#">Click here to enter a date.</a>

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	<b>Brian Thompson</b>		
<b>Office:</b>	ORR	<b>Title:</b>	Unit Chief
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#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	<b>Brian Thompson</b>		
<b>Office:</b>	ORR	<b>Title:</b>	Unit Chief
<b>Phone:</b>	540-686-3602	<b>Email:</b>	<a href="mailto:Brian.Thompson6@fema.hhs.gov">Brian.Thompson6@fema.hhs.gov</a>



## SPECIFIC IC/Forms PTA QUESTIONS

### 1. Purpose of the Information Collection or Form

- a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*

*If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.*

The purpose of this PTA is to expand on the types of additional documents that will be requested and accepted from FEMA applicants when verifying ownership or occupancy during the application process for FEMA Individuals and Households Program assistance.

On January 20, 2021, President Biden issued Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, designed to pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Pursuant to this Executive Order and other related presidential memoranda, FEMA posted a Request for Information (RFI) in the *Federal Register*, requesting information on the extent to which existing agency programs, regulations, and policies perpetuate systematic barriers to opportunities and benefits for people of color and other underserved groups; bolster resilience to the impacts of climate change; and address the disproportionately high and adverse climate-related impacts on disadvantaged communities.

Based on the feedback received via this RFI and an internal analysis of our statutory and regulatory authorities and current policy and program guidance, FEMA noted areas where additional flexibilities could be provided to ensure access to assistance is equitably provided to all applicants; when FEMA applicants are unable to provide the requested occupancy or ownership verification documents, FEMA will accept a self-declarative statement of occupancy or ownership when the damaged dwelling was that of a mobile home, travel trailer, or island/tribal.

*The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended, is the legal basis for the Federal Emergency Management Agency (FEMA) to provide financial assistance and services to individuals applying for disaster assistance benefits in the event of a federally-declared disaster. Regulations in 44 CFR, § 206.110 - Federal Assistance to Individuals and Households implements the policy and procedures set forth in Section 408 of the Stafford Act, 42 U.S.C. 5174, as amended. This program 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 expenses or needs through other means.

Individuals and households applying for assistance must provide information detailing their losses and needs through this information collection. The Other Needs Assistance (ONA) provision of the Individuals and Households Program (IHP) provides financial assistance to address disaster-related medical, dental, funeral, child care, personal property, transportation, and other necessary expenses or serious needs resulting from a major disaster.

FEMA is required to provide meaningful access to its programs and activities for people with disabilities under Section 504 of the *Rehabilitation Act of 1973* and Section 308 of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)*, PL 93-288, as amended. FEMA regulations at 44 CFR Part 16, *Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Federal Emergency Management Agency implement Section 504 of the Rehabilitation Act of 1973, as amended*, and the disability-related nondiscrimination provisions set forth in Sections 308 and 309 of the *Stafford Act*. In addition, Department of Homeland Security (DHS) *Directive Number 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment)*, issued 9/25/2013, requires DHS components to provide equal opportunity for qualified individuals with disabilities served or encountered in DHS-conducted programs and activities, including providing any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial or administrative burdens to DHS.

Applicants (both owners and renters) must be able to prove they occupied the disaster-damaged primary residence before receiving Housing Assistance (HA) and some types of Other Needs Assistance (ONA), e.g. Personal Property Assistance, Moving and Storage Assistance, and Critical Needs Assistance. The following types of ONA DO NOT require verification of occupancy of the primary residence: Transportation Assistance, Funeral Assistance, Medical Assistance, Dental Assistance, and Child Care Assistance. NOTE: The Code of Federal Regulations (CFR) defines occupant as a resident of a housing unit.

Occupancy-dependent eligible expenses include costs associated with: Home Repair Assistance, Home Replacement Assistance, or Permanent Housing Construction; Temporary Housing Assistance, e.g. Rental Assistance, Lodging Expense Reimbursement, or Direct Housing Assistance; Critical Needs Assistance; Personal Property Assistance (Exception: A verification of occupancy is NOT a requirement for stored personal property); Miscellaneous/Other Items; and Moving and Storage.



A primary residence is the home where the applicant normally lives during the majority of the calendar year (more than six months), or the home required because of proximity to employment, including agriculture activities that provide 50% of the household's income. Primary occupancy for household members may also include individuals NOT present at the time of the disaster, e.g. infants, spouse, or students, but who are expected to return during the assistance period. If an applicant was NOT occupying the disaster-damaged residence at the time of the disaster, they may still be eligible if they can prove their intent to occupy the home as their primary residence.

When FEMA is unable to verify an applicant's occupancy of their disaster-damaged primary residence, FEMA informs the applicant via letter that additional information is required to verify occupancy. The applicant may provide FEMA with any of the documents outlined below for occupancy verification. The documents may be provided in person at a FEMA facility such as DRC and/or via mail, fax, or uploaded by the applicant to their electronic FEMA registration. Previously, occupancy documents had to be dated within three months prior to the disaster.

To provide additional flexibility to disaster survivors who may experience difficulty in gathering specific documents, FEMA has expanded the types of documents we will accept from applicants to verify IHP eligibility criteria and the extended acceptable date range for documents to include pre and post disaster where appropriate. For the purpose of the following list of documents, one year prior to the disaster means within one year prior to the start of the incident period for the declared disaster. Documents provided to FEMA with a date within the registration period must show pre-disaster usage, such as a phone or utility bill, or clearly show that the applicant or co-applicant resided at the damaged dwelling at the time of the disaster.

When FEMA is unable to verify an applicant's ownership of their primary residence, FEMA informs the applicant via letter that additional information is required to verify ownership. The applicant may provide FEMA with any of the documents outlined below to prove ownership. The documents may be provided in person at a FEMA facility such as DRC and/or via mail, fax, or uploaded by the applicant to their electronic FEMA registration. For documents provided to FEMA with a date in the registration period, the document must demonstrate the applicant owned the damaged dwelling at the time of the disaster. If the applicant is a minor child, documentation must be in the parent/guardian co-applicant's name.

The documentation or verification needed to verify occupancy include one of the following: Utility Bills, Other Bills, Employer's Documents, Lease/Housing Agreement, Landlord (LL) Statement, Rent Receipts, Bank Statements with image of the cancelled rent check, Public Official's Documents, Social Service Organization Documents, Federal or State Benefit Documents, Local School Documents, Motor Vehicle Registration, Driver's License, State-issued Identification (ID) card, Voter's Registration Card, Mobile



Home Park Documents, and Affidavits of Residency or other Court Documents. Please reference the enclosed **appendix** for more information and examples of these types of documents.

If the listed documentation is unavailable, FEMA may accept a written self-declaration of occupancy as a last resort from applicants whose pre-disaster residence was a mobile home or travel trailer. FEMA may also accept a written self-declaration from applicants living in any type of housing located in insular areas, e.g. Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the U.S. Virgin Islands, Puerto Rico, or otherwise remote areas such as the interior of Alaska, tribal lands, and islands. Written self-declarations must include the address of the disaster-damaged residence, the length of time they lived in the disaster damaged residence prior to the Presidential disaster declaration, an explanation of the circumstances that prevent standard occupancy verification, an under penalty of perjury statement, and the applicant's name and signature.

Applicants must be able to prove they owned and occupied the damaged dwelling (DD), pre-disaster, as their primary residence before receiving Home Repair Assistance; Home Replacement Assistance; or Permanent Housing Construction under the Housing Assistance (HA) provision of the IHP.

Documentation or Verification Needed for ownership verification (at least one): Deed or Official Record, Mortgage Documents, Real Property (RP) Insurance document, bill, or payment record, Property Tax Receipts or Bill, Manufactured Home Certificate of Title, Real Estate Provision, Contract for Deed, Land Installment Contract, Quitclaim Deed, Bill of Sale or Bond for Title, Death Certificate accompanied by a Will; Affidavit of Heirship (only when consistent with state, territorial, or tribal government law); Receipts for Major Repairs or Improvements, Letter or Written Statement from a Mobile Home Park owner or manager, Court Documents, or a letter or other written statement from a Public Official's verifying the applicant owned the disaster-damaged residence at the time of the disaster. Please reference the enclosed **appendix** for more information and examples of these types of documents

Regardless of the ownership verification method (NEMIS public records verification, visual verification during housing inspection process, or submitted documents), an applicant who is responsible for maintenance and/or taxes will be considered an owner. Ownership documents must reflect: the name of the applicant or co-applicant registering for assistance. If a minor child is registering for assistance, the document must be in the adult co-applicant's name; the address of the damaged pre-disaster residence; and a date prior to the disaster incident period.

Document exceptions: if the listed documentation is unavailable, FEMA may accept a written self-declarative statement of ownership from applicants living in a mobile home



or travel trailer. FEMA will also accept a written self-declarative statement as a last resort from applicants living in insular areas, e.g. Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the U.S. Virgin Islands, Puerto Rico, or otherwise remote areas such as the interior of Alaska; tribal lands, and islands.

Self-declarative statements must be provided to FEMA in writing to be maintained in the applicant's file, not solely viewed by an inspector. The statement must include:

- the address of the disaster-damaged residence;
- length of time the applicant lived in the disaster-damaged primary residence prior to the Presidential disaster declaration;
- the major elements of the following statement and additional explanation, "I have made a good faith effort, in coordination with FEMA, to obtain and provide a copy of acceptable ownership documentation. I do meet FEMA's definition of an owner-occupant because I am (A) the legal owner of the home, (B) pay no rent, but am responsible for the payment of taxes or maintenance for the residence, or (C) hold lifetime occupancy rights. I was unable to obtain this documentation because [provide an explanation of the circumstances that prevent standard ownership verification of the appropriate owner-occupant category]. I hereby declare under penalty of perjury that the foregoing is true and correct."; and
- the applicant's name and signature.

FEMA may also accept a written self-declarative statement as a last resort from applicants whose pre-disaster residence was passed down via heirship (Heirship is the legal right to receive real and personal property under state law upon the death of an ancestor or next of kin). Self-declarative statements must be provided to FEMA in writing to be maintained in the applicant's file, not solely viewed by an inspector. The statement must include:

- the address of the disaster-damaged residence;
- length of time the applicant lived in the disaster-damaged primary residence prior to the Presidential disaster declaration;
- the major elements of the following statement and additional explanation, "I have made a good faith effort, in coordination with FEMA, to obtain and provide a copy of acceptable ownership documentation. I was unable to obtain this documentation because [provide an explanation of the circumstances that prevent standard ownership verification].";
- the major elements of the following statement, "As the nearest relative of the deceased in the line of succession, my ownership includes all the rights and obligations of the deceased. The decedent's name is \_\_\_\_\_, who died on \_\_\_\_\_. I hereby declare under penalty of perjury that the foregoing is true and correct."; and
- the applicant's name and signature.



Applicants who pay rent to another party to live in the home DO NOT qualify as owners. There may be an exception if the applicant is legally responsible for major repairs and/or taxes on the damaged residence through lease-to-own or land installment agreements. Additional exceptions are made in the circumstance of adverse possession, hereditary family lands, and cultural traditions in islands or insular areas. For Intent to Own, there may be instances when an applicant was in the process of purchasing the damaged dwelling and was unable to complete the purchase before the disaster occurred. If the applicant has provided documentation showing Intent to Own within the incident period, a request for clarification of documents is submitted to IHP Program Specialists for review.

- b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

*The Robert T. Stafford Disaster Relief and Emergency Act, Pub. L. 93-288 provides the legal authority for FEMA's collection of information for disaster assistance benefits. 44 CFR §206.110 implements the policy and procedures set forth in section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5174, as amended.*

*44 CFR Part 16, Enforcement of Nondiscrimination on the Basis of [Disability] in Programs or Activities Conducted by the Federal Emergency Management Agency, implements Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794, and the disability-related non-discrimination provisions set forth in §§ 308 and 309 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C. §§ 5151 and 5152.*

*DHS Directive Number 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-employment) issued 9/25/2013 requires DHS Components to provide equal opportunity for qualified individuals with disabilities served or encountered in DHS-conducted programs and activities, including providing any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial or administrative burdens to DHS. These laws, regulations, and policies require FEMA to provide meaningful access to individuals with disabilities.*

*The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C. §§ 5121-5207; 6 U.S.C. 776-77; The Homeland Security Act of 2002, 6 U.S.C. §§ 311-321j; Reorganization Plan No. 3 of 1978; 4 U.S.C. §§ 2904 and 2906; 44 CFR § 206.2(a)(27); The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193); the Government Performance and Results Act, Pub. L. 103,62, as amended; Executive Order 12862, Setting Customer Service Standards, dated September*





11, 2003; *Executive Order 13411, Improving Assistance for Disaster Victims*, dated August 29, 2006; and *Executive Order 9397 as amended by Executive Order 13478, Related to Federal Agency Use of Social Security Numbers*, dated November 18, 2008.

FEMA requests Social Security Numbers (SSNs) pursuant to the *Debt Collection Improvement Act of 1996, 31 U.S.C. §§ 3325(d) and 7701(c)(1), as amended.*

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</li> <li><input checked="" type="checkbox"/> Non-U.S. Persons.</li> </ul> <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
c. Who will complete and submit this form? (Check all that apply.)	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> Please describe.

<sup>1</sup> Personally identifiable information means any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



	Click here to enter text.
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input type="checkbox"/> Paper.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i> <a href="http://www.disasterassistance.gov">www.disasterassistance.gov</a></p>
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>	
<p><b>Currently Approved Information Collected:</b></p> <ul style="list-style-type: none"> <li>• Applicant and household member names</li> <li>• Applicant’s Citizenship Status</li> <li>• Disability-related accommodations or assistance the applicant may need: <ul style="list-style-type: none"> <li>○ Sign Language Interpreter</li> <li>○ CART (Communication Access Real-time Translation) (in person or remote)</li> <li>○ Text Message to Communicate</li> <li>○ Assistive Listening Device</li> <li>○ Braille</li> <li>○ Wheelchair Access</li> <li>○ Large Print</li> <li>○ Face-to-Face Assistance</li> <li>○ Language Other Than English</li> </ul> </li> <li>• Age of household occupants</li> <li>• Household occupants’ relationship to the applicant</li> <li>• Dependent status of household occupants</li> <li>• Damaged dwelling address</li> <li>• Current mailing address</li> <li>• County in which the damaged occurred</li> <li>• Applicant’s current phone number</li> <li>• Applicant’s alternate phone number</li> <li>• Applicant’s cell phone number</li> <li>• Applicant’s email address</li> <li>• Birth date of the applicant, co-applicant, and household occupants</li> <li>• Social Security Number (of the applicant and co-applicant only)</li> </ul>	



- Household income of applicant, co-applicant, and adult occupants
- Home insurance information
- Residence type
- Bank name
- Bank account type
- Bank account number
- Amount of damage (self-assessed) to the applicant’s home or personal property
- Disaster-related expenses
  - Medical
  - Dental
  - Funeral
- Medical, Dental, and Funeral/Burial insurance information
- Household vehicle information
  - Year
  - Make
  - Model
  - Damaged by the disaster (yes or no)
  - Currently Drivable (yes or no)
  - Insurance Information
  - Current registration status (yes or no)
- Emergency Needs (food, medication, durable medical equipment, gas, shelter, and/or clothing)
- Applicant or household member disability-related needs, for example:
  - Mobility
  - Cognitive/Developmental Disabilities/Mental Health
  - Hearing or Speech
  - Vision
  - Self-Care
  - Independent Living

No new data elements are collected by FEMA as a result of this process; however, new categories of documents are collected to verify occupancy and ownership. For a full list of the document categories and examples see **appendix**.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? *Check all that apply.*

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange |
| <input type="checkbox"/> Alien Number (A-Number)           | Personal Identifier (EDIPI)                              |



- |  |  |
|--|--|
| <input type="checkbox"/> Tax Identification Number   | <input type="checkbox"/> Social Media Handle/ID                                  |
| <input type="checkbox"/> Visa Number   | <input type="checkbox"/> Known Traveler Number                                   |
| <input type="checkbox"/> Passport Number   | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input checked="" type="checkbox"/> Bank Account, Credit Card, or other financial account number | <input type="checkbox"/> Driver's License Number                                 |
| <input checked="" type="checkbox"/> Other. <i>Please list:</i> Disability-related information    | <input type="checkbox"/> Biometrics  |

g. List the **specific authority** to collect SSN or these other SPII elements.

*The Robert T. Stafford Disaster Relief and Emergency Act, Public Law 93-288 provides the legal authority for FEMA's collection of information for disaster assistance benefits. 44 CFR § 206.110 implements the policy and procedures set forth in section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5174, as amended.*

*The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C. §§ 5121-5207; The Homeland Security Act of 2002, 6 U.S.C. §§ 311-321j; Reorganization Plan No. 3 of 1978; 4 U.S.C. §§ 2904 and 2906; 44 CFR § 206.2(a)(27); The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193); Executive Order 12862, Setting Customer Service Standards, dated September 11, 2003; and Executive Order 13411, Improving Assistance for Disaster Victims, dated August 29, 2006.*

*FEMA requests SSNs pursuant to the Debt Collection Improvement Act of 1996, 31 U.S.C. §§ 3325(d) and 7701(c)(1), as amended.*

*Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.*

h. How will this information be used? What is the purpose of the collection? Describe **why** this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.

Applicants will submit occupancy or ownership verification documents via online upload or fax. FEMA uses these verification documents to determine eligibility for Housing Assistance. This information is not shared outside of FEMA.

The SSN is collected to verify the applicant's identity and prevent duplication of disaster



benefits among FEMA, federal, state, and local disaster agencies. In accordance with the U.S. Treasury Department, the applicant’s social security number is required to issue funds to individuals determined eligible for assistance.

Additional SPII is collected for FEMA to deposit financial assistance through electronic funds transfers (EFT) to applicants’ bank accounts. Medical information is collected for the purpose of reimbursing survivors for disaster-related injuries, and to replace durable medical equipment lost or damaged due to the disaster.

<p>i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?</p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided.</p> <p>Individuals will be provided separate notices consistent with the purpose of the information collection. Notice is provided when the applicant registers for assistance, and a copy of the disaster assistance registration is mailed to the applicant which includes the notice.</p> <p><input type="checkbox"/> No.</p>
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3. How will DHS store the IC/form responses?	
<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. National Emergency Management Information System – Individual Assistance (NEMIS-IA) will store the data</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. NEMIS-IA</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe.</p>



	<p>FEMA manually enters data into the NEMIS-IA electronic version of FF 009-0-1 or 009-0-2 for registrants applying for disaster assistance telephonically or using paper versions of the forms.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.</p> <p>Information is collected and uploaded into the NEMIS-IA Registration Intake Modules via business rules.</p>
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><input checked="" type="checkbox"/> By a unique identifier.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p> <p>By the applicant’s name, address, social security number, disaster registration ID, and email address.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p><a href="#">Click here to enter text.</a></p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records pertaining to disaster assistance will be placed in inactive storage two years after FEMA receives the application and will be destroyed when they are six years and three months old, NARA Authority N1-311-86-1, item 4C10a. These same records when electronically entered into NEMIS will be stored indefinitely.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>The program adheres to the disposition schedule which provides timeframes for records destruction and/or disposal of relevant documents associated with the program.</p>

<sup>2</sup> Generally, a unique identifier is considered any type of “personally identifiable information,” meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



f. Is any of this information shared outside of the original program/office? *If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?*

Yes, information is shared with other DHS components or offices. Please describe.

FEMA programs administering federal disaster relief assistance adhere to comprehensive internal management procedures to prevent, detect, deter, report, and investigate fraud, waste, and abuse. FEMA programs and employees proactively review FEMA's awards of disaster assistance payments. After the disaster assistance registration process, it may be found an applicant potentially committed fraud and/or identity theft. FEMA may share the applicant information with the DHS Office of the Inspector General (OIG) to assist with investigation of potential fraud and/or identity theft.

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

Upon receipt of the information collected during the disaster assistance registration process, FEMA may share disaster applicant information with state governments to assist with implementation of housing programs, to ensure applicants receive additional disaster assistance as necessary, and to prevent a duplication of benefits.

FEMA programs administering federal disaster relief assistance adhere to comprehensive internal management procedures to prevent, detect, deter, report, and investigate fraud, waste, and abuse. FEMA programs and employees proactively review FEMA's awards of disaster assistance payments. After the disaster assistance registration process, it may be found an applicant potentially committed fraud and/or identity theft. FEMA may share the applicant information with the Federal Bureau of Investigations (FBI), the Department of Justice (DOJ) and/or state law enforcement to assist with investigation of potential fraud and/or identity theft.

If the applicant receives FEMA financial assistance and it is later determined the assistance was awarded improperly or due to the applicant providing false information, the applicant's information may be provided to the Department of Treasury (DOT) to recoup the previously awarded funds.

FEMA will share disaster applicant information, for applicants who exceed the Small



Business Administration (SBA) provided income threshold, to the SBA Credit Management Systems for low-interest loan consideration. Personal information such as name, address, social security number, assets and salary are securely transmitted from FEMA to SBA for processing. SBA will return a status code for each application received from FEMA, reflecting their SBA disaster loan eligibility.

FEMA has contracted with risk management vendors to provide information received from applicants during registration intake for identity verification purposes. The vendor returns a pass/fail result to FEMA and assists in verifying applicant occupancy of the residence damaged by the disaster as needed.

A Memorandum of Understanding (MOU) and Interconnects Security Agreement (ISA) between FEMA and each participating agency defines the conditions for security and data use, from data exchanges, to the extent they are not covered by other formal arrangements or agreements between the Parties. This agreement also covers any existing data exchanges covered in the DHS/FEMA – REG 2 DRA SORN.

FEMA has a Computer Matching Agreement (CMA) with the Department of Housing and Urban Development (HUD). The purpose of the matching program is to:

- Establish or verify initial or continuing eligibility for DHS/FEMA disaster assistance programs;
- Verify compliance with statutory or regulatory program requirements; and
- Recoup payments or delinquent debts under an identified program.
- Specifically, DHS/FEMA and HUD seek to ensure that individuals do not receive duplicate or erroneous disaster assistance for the same disaster or emergency and/or housing benefits from either agency.

#### Legal authorities

This agreement is executed in compliance with *Privacy Act of 1974 (5 U.S.C.552a)*, as amended.

*The Robert T. Stafford Disaster Relief and Emergency Assistance Act P.L. 93-288, (42 U.S.C. 5121, 42 U.S.C. 5155, 42 U.S.C. 5174); 44 C.F.R. 206.2(a)(27), 206.110(e), 206.115(f), and 206.44.*

*The Debt Collection Improvement Act of 1996, 31 U.S.C. 3325(d) and 7701(c)(1), as amended.*





HUD regulations *24 CFR 5.233, Community Development Block Grant (CDBG) program* as required by *Title I of the Housing and Community Development Act of 1974, 12 U.S.C. 1706e*, as amended by the *Community Development Block Grant-Disaster Recovery (CDBG-DR) Appropriations Acts (Pub. L. 113-2)*, and by the notices published in Federal Register that govern these *CDBG-DR Appropriations Acts*.

No. Information on this form is not shared outside of the collecting office.



**Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.**



## PRIVACY THRESHOLD REVIEW

**(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)**

Component Privacy Office Reviewer:	<b>Janica Woodley</b>
Date submitted to component Privacy Office:	<b>August 11, 2021</b>
Date submitted to DHS Privacy Office:	August 11, 2021
Have you approved a Privacy Act Statement for this form? <i>(Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)</i>	<input checked="" type="checkbox"/> Yes. Please include it with this PTA submission. <input type="checkbox"/> No. Please describe why not. <a href="#">Click here to enter text.</a>
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
FEMA Privacy recommends compliance coverage as follows: <ul style="list-style-type: none"> <li>▪ SORN: DHS/FEMA-008 Disaster Recovery Assistance Files - Explicit coverage is provided in the categories of records provided in the pending update. FEMA is seeking interim coverage under the existing SORN pending the update. The existing SORN provides implicit coverage in the “temporary housing assistance” and “assistance from other sources” categories. The Registration Records category provides patchwork coverage for the data collected via the various document types.</li> <li>▪ PIA: DHS/FEMA/PIA-049 Individual Assistance (IA) Program</li> </ul>	



## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	<b>Joseph Thomas</b>
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	August 12, 2021
PTA Expiration Date	August 12, 2022

## DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If "no" PTA adjudication is complete.</b>
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 SPII 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"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
DHS IC/Forms Review:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	Choose an item. E(3) statement has been reviewed and approved.
PTA:	Choose an item. Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: DHS/FEMA/PIA-049 Individual Assistance (IA) Program If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
SORN:	<p><b>SORN update is required.</b> If covered by existing SORN, please list: <a href="#">Click here to enter text.</a> If a SORN update is required, please list: DHS/FEMA-008 Disaster Recovery Assistance Files, April 30, 2013, 78 FR 25282</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA has submitted this PTA to expand on the types of additional documents that will be requested and accepted from FEMA applicants when verifying ownership or occupancy during the application process for FEMA Individuals and Households Program assistance. When FEMA applicants are unable to provide previously requested occupancy or ownership verification documents, FEMA will now accept a self-declarative statement of occupancy or ownership.</p> <p>Individuals and households applying for assistance must provide information detailing their losses (disaster-related medical, dental, funeral, child care, personal property, transportation, and other necessary expenses) and needs through this information collection. Applicants (both owners and renters) must be able to prove they occupied the disaster-damaged primary residence before receiving HA/ONA.</p> <p>When FEMA is unable to verify an applicant’s occupancy of their disaster-damaged primary residence, FEMA informs the applicant via letter that additional information is required to verify occupancy. The applicant may provide FEMA with any of the documents included in the included appendix for occupancy verification. If the listed documentation is unavailable, FEMA may accept a written self-declaration of occupancy as a last resort from applicants whose pre-disaster residence was a mobile home or travel trailer. FEMA may also accept a written self-declaration from applicants living in any type of housing located in insular areas, e.g. Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the U.S. Virgin Islands, Puerto Rico, or otherwise remote areas such as the interior of Alaska, tribal lands, and islands.</p> <p>DHS PRIV concurs with FEMA that this collection remains privacy-sensitive, and requires both PIA and SORN coverage. PIA coverage is provided by DHS/FEMA/PIA-049 Individual Assistance (IA) Program, which addresses the collection and processing of disaster survivor information related to IA.</p>	



Interim SORN coverage is provided by DHS/FEMA-008 Disaster Recovery Assistance Files, which is currently undergoing an update approval process to clarify that FEMA will be collecting additional/supplemental information explicitly supporting this revised collection.

PRIV has reviewed the Privacy Act Statement available at [www.disasterassistance.gov](http://www.disasterassistance.gov) and finds it appropriate for the collection.