



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

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.

Form Number:	FEMA Forms FF-104-FY-21-122 (formerly FF 009-0-1, English), FF-104-FY-21-122-A (formerly FF 009-0-2, Spanish), FEMA Forms FF-104-FY-21-123 (formerly FF 009-0-1T, English), FF-104-FY-21-123-A (formerly FF 009-0-1T, Spanish), FEMA Form FF-104-FY-21-123-COVID-FA (English), FEMA Forms FF-104-FY-21-125 (formerly FF 009-0-1Int, English), FEMA Form FF-104-FY-21-125-A (formerly FF 009-0-2Int, Spanish), FEMA Forms FF-104-FY-21-127 (formerly FF 009-0-5, English), FF-104-FY-21-127-A (formerly FF 009-0-6, Spanish), FEMA Forms FF-104-FY-21-128 (formerly FF 009-0-3, English), FF-104-FY-21-128-A (formerly FF 009-0-4, Spanish), and Request for Information (RFI) (English and Spanish)		
Form Title:	Disaster Assistance Registration – Streamline Registration Intake (RI)		
Component:	Federal Emergency Management Agency (FEMA)	Office:	Office of Response and Recovery (ORR)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Disaster Assistance Registration		
OMB Control Number:	1660-0002	OMB Expiration Date:	N/A
Collection status:	New	Date of last PTA (if applicable):	N/A



PROJECT OR PROGRAM MANAGER

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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Millicent Brown Wilson		
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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 Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR) submits this Privacy Threshold Analysis (PTA) for the Streamline Registration Intake (RI) process information collection. *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 using the paper forms and/or webforms detailed below.

Using the forms Streamline Registration Intake forms, applicants for disaster assistance are able to select the type of assistance they require and only answer questions directly related to the specific types of assistance they need. This will decrease the number of questions survivors need to answer and reduce the time to complete their disaster application online or at a FEMA disaster recovery center. Further, Survivors with business losses, damage to vacation or secondary homes, and unemployment-only needs will be advised earlier in the process that FEMA does not provide this assistance for these categories. Instead of FEMA capturing unnecessary data, FEMA will direct these survivors to agencies that can help them with their needs.

Paper forms are utilized in circumstances, such as power outages, when webforms are not available. These paper forms are manually transcribed into the webform when resources are available to do so (e.g. when power is restored). The information collected from applicants is initially entered into Disaster Assistance Improvement Program (DAIP) platforms such as the Individual Assistance (IA) Survivor Online Application & Resource Portal (SOAR). DAIP then disseminates the information to National Emergency Information System (NEMIS) and the other IA IT systems that require the information to accomplish their purposes in facilitating the IA process (see: Individual Assistance (IA) Program DHS/FEMA/PIA-049). The information gathered through this process will decrease the amount of time needed to create a new registration and allow the survivor to skip any irrelevant question that do not pertain to their damages.

Overall, this collection reflects proposed changes to the disaster assistance application process that will



reduce the time and burden in applying for disaster assistance.

The new and updated forms of the RI are as follows:



FEMA Forms FF-104-FY-21-122 (formerly FF 009-0-1, English) and FF-104-FY-21-122-A (formerly FF 009-0-2, Spanish), Paper Application – When a federally-declared disaster or emergency occurs, a tele-registration 800 number and disaster assistance website are published for individuals to apply for FEMA assistance. In rare circumstances where the system is inaccessible or telecommunication capabilities are inoperable, FEMA service representatives will record the individual’s information using paper versions of FF-104-FY-21-122 (formerly FF 009-0-1, English) or FF-104-FY-21-122-A (formerly FF 009-0-2, Spanish). Once completed and when the system becomes accessible, the FEMA representative manually enters the information into NEMIS. Burden hours have decreased by 14,698 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

FEMA Forms FF-104-FY-21-123 (formerly FF 009-0-1T, English) and FF-104-FY-21-123-A (formerly FF 009-0-1T, Spanish), Tele-Registration – When a federally-declared disaster or emergency occurs, a tele-registration 800 number is published for individuals to call and apply for assistance. A FEMA service representative interviews individuals over the telephone utilizing the questions in this information collection and records the information directly into the electronic copy of FF-104-FY-21-123 (formerly FF 009-0-1T, English) in FEMA’s National Emergency Management Information System (NEMIS) database. Burden hours have decreased by 317,011 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

FEMA Form FF-104-FY-21-123-COVID-FA (English), Tele-Registration, COVID-19 Funeral Assistance – As a result of the Consolidated Appropriations Act, 2021, a dedicated Call Center phone number was created for applicants to apply for COVID-19 Funeral Assistance. The currently approved FF-104-FY-21-123 disaster assistance registration script is used, with staff trained to clarify for applicants how the current questions relate to COVID-19 Funeral Assistance.

FEMA Forms FF-104-FY-21-125 (formerly FF 009-0-1Int, English) and FEMA Form FF-104-FY-21-125-A (formerly FF 009-0-2Int, Spanish), Internet – When a federally-declared disaster or emergency occurs, a website is published for individuals to apply for disaster assistance through www.DisasterAssistance.gov, which utilizes FF-104-FY-21-125 (formerly FF 009-0-1Int, English) or FF-104-FY-21-125-A (formerly FF 009-0-2Int, Spanish). The information collected is electronically transferred into the NEMIS database. Burden hours have increased by 169,775 due to a system release which combined Internet and Smartphone into one comprehensive platform.

FEMA Forms FF-104-FY-21-127 (formerly FF 009-0-5, English) and FF-104-FY-21-127-A (formerly FF 009-0-6, Spanish), Revocable License – Individuals who qualify for transportable temporary housing units (TTHU) such as Manufactured Housing Units (MHU), recreational vehicles or travel trailers, or other fabricated dwellings through FEMA Direct Temporary Housing Assistance are required to acknowledge and accept conditions for receiving and occupying government property. Once an individual is determined eligible for Direct Temporary Housing Assistance, FEMA uses the information collected in FF-104-FY-21-122 (formerly FF 009-0-1), FF-104-FY-21-122-A (formerly FF 009-0-2), FF-104-FY-21-123 (formerly FF 009-0-1T), FF-104-FY-21-125 (formerly FF 009-0-1Int), or FF-104-FY-21-125-A (formerly FF 009-0-2Int) to prepare the *Manufactured Housing Unit Revocable License and Receipt for Government Property* form permitting applicants to use MHUs as temporary



housing. Burden hours have decreased by 1,949 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

FEMA Forms FF-104-FY-21-128 (formerly FF 009-0-3, English) and FF-104-FY-21-128-A (formerly FF 009-0-4, Spanish), Declaration and Release – For FEMA disaster assistance eligibility requirements to be met, a household member must be a citizen, non-citizen national or qualified alien of the United States. FF-104-FY-21-128 (formerly FF 009-0-3, English) or FF-104-FY-21-128-A (formerly FF 009-0-4, Spanish) is used to certify the individual’s information and eligibility. Information gathered in this form is imbedded within FF-104-FY-21-125 (formerly FF 009-0-1Int), FF-104-FY-21-125-A (formerly FF 009-0-2Int), and FF-104-FY-21-123 (formerly FF 009-0-1T), therefore FF-104-FY-21-128 (formerly FF 009-0-3) and FF-104-FY-21-128-A (formerly FF 009-0-4) are only utilized in circumstances when FEMA registrations are collected via FF-104-FY-21-122 (formerly FF 009-0-1) or FF-104-FY-21-122-A (formerly FF 009-0-2), Paper Application. Burden hours have decreased by 1,640 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

Request for Information (RFI) (English and Spanish) – RFI letters are currently utilized to gather additional documentation from disaster assistance applicants to verify disaster related losses and to prevent a duplication of benefits (i.e., receiving insurance settlement payments that fully cover the losses and receiving the same financial assistance from FEMA). RFIs are tailored to the applicant’s claimed loss categories (e.g., transportation, moving and storage, medical/dental, child care, etc.), and request information such as vehicle registrations, auto mechanic receipts, and vehicle insurance policies; itemized bills, receipts, or estimates from medical providers, written statements from medical providers confirming injuries or illnesses are disaster-related, and medical insurance policies; itemized receipts, bills, or estimates for moving and storage expenses and insurance settlement letters; proof of income before and after the disaster, proof of child care expenses before and after the disaster, and proof the child care provider is licensed. Burden hours have decreased by 62,927 due to updated forecasting estimates received from the FEMA RAD based on historical data from years 2007-2019.

FEMA Form FF-256-FY-21-100 (English), Equity Demographics Questions – FEMA will obtain information about the demographic characteristics of those who apply for disaster assistance grants and will allow FEMA to assess and enforce its civil rights, nondiscrimination and equity requirements and obligations as outlined in Federal civil rights laws such as the Civil Rights Act, Rehabilitation Act and Stafford Act. As an example of FEMA’s requirements, Section 308 of the Robert T. Stafford Act requires disaster assistance, including “the distribution of supplies, the processing of applications, and other relief and assistance activities” by FEMA and recipients of FEMA financial assistance, “be accomplished in an equitable and impartial manner, without discrimination on the grounds of race, color, religion, nationality, sex, age, disability, English proficiency, or economic status.”

The questions will be included towards the end of a grant collection form online, through the call center, and on paper. The data collection will use technology to search, query, or analyze information based on the demographic categories and protected characteristics identified in civil rights laws, including the Stafford Act.



- 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 C.F.R. §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 C.F.R. 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 Homeland Security Act of 2002, 6 U.S.C. §§ 311-321j; Reorganization Plan No. 3 of 1978, 43 Fed. Reg. 41943; 4 U.S.C. §§ 2904 and 2906; 44 C.F.R. § 206.2(a)(27); The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104-193; the Government Performance and Results Act of 1993, 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 Act and the Debt Collection Improvement Act of 1996, 31 U.S.C. §§ 3711 – 3720E Pub. L. 104-134, as amended; and Internal Revenue Code of 1986, 26 U.S.C. § 6109 and 31 U.S.C. §§ 3325(d) and 7701(c)(1).



2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons. <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? <i>(Check all that apply.)</i>	<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 checked="" type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i>
d. How do individuals complete the form? <i>Check all that apply.</i>	<input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link: www.DisasterAssistance.gov</i>

¹ 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.



e. What information will DHS collect on the form? *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.*

Demographic Questions:

- Applicant's Demographics:
 - Ethnicity (Hispanic or Latino, Neither, or Prefer not to Answer)
 - Racial category (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, or Prefer Not to Answer)
- Gender (Female, Male, Another Identity [e.g., transgender, nonbinary, or gender variant], or Prefer Not to Answer)
- Tribal Nation enrollment status (Yes, No, or Prefer Not to Answer)
- Highest Level of Formal Education (Did not complete high school, High School Graduate/GED, Some College, Associate Degree, Bachelor's Degree, Master's Degree, Doctoral Degree, or Prefer Not to Answer)
- Marital Status (Never Married, Married or Living with Partner, Separated, Widowed, Divorced, or Prefer Not to Answer)

Currently Approved Information Collected in RI:

- Individual and/or household member names
- Individual and/or household member relationships to the applicant
- Applicant's Citizenship Status
- Disability-related accommodations or assistance the applicant may need
 - Sign Language Interpreter
 - CART (Communication Access Real-time Translation) (in person or remote)
 - Text Message to Communicate
 - Assistive Listening Device
 - Braille
 - Wheelchair Access
 - Large Print
 - Face-to-Face Assistance
 - Language Other Than English
- Age of household occupants
- Dependent status of household occupants
- Damaged dwelling address
- Current mailing address
- County in which the damaged occurred
- Applicant's current phone number
- Applicant's alternate phone number
- Applicant's cell phone number



- Birth date of the applicant, co-applicant, and household occupants
- Social Security Number (of the applicant and co-applicant only)
- Household income of applicant, co-applicant, and adult occupants
- Home insurance information
- Residence type
- Bank name
- Bank account type
- Bank account number
- Applicant's email address
- Amount of damage (self-assessed) to the applicant's home or personal property
- Disaster-related expenses
 - Medical
 - Dental
 - Funeral
- Household vehicle information
 - Year
 - Make
 - Model
 - Damaged
 - Insurance Information
 - Childcare expenses
- 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



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

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 Homeland Security Act of 2002, 6 U.S.C. §§ 311- 321j; Reorganization Plan No. 3 of 1978, 43 Fed. Reg. 41943; 4 U.S.C. §§ 2904 and 2906; 44 C.F.R. § 206.2(a)(27); The Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104-193; the Government Performance and Results Act of 1993, 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 Act* and the *Debt Collection Improvement Act of 1996*, 31 U.S.C. §§ 3711 – 3720E Pub. L. 104–134, as amended; and *Internal Revenue Code of 1986*, 26 U.S.C. § 6109 and 31 U.S.C. §§ 3325(d) and 7701(c)(1).

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.



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.

Demographic data will be used to assess whether FEMA programs appear to be treating everyone the same with respect to race, ethnicity, gender identity, marital status, or education. Any anomalies detected can be used for FEMA to assess policies and make changes to policies and procedures to better assist underserved communities.

i. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of the collection or is form filled out by third party*)?

Yes. Please describe how notice is provided.

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. Additional notice, specific to the purpose and uses of the demographic information, is provided prior to collection that information.

No.



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, but will not make demographic information visible to caseworkers or other staff</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. FEMA manually enters data into the NEMIS-IA electronic version of FF-104-FY-21-122 (formerly FF 009-0-1, English) or FF-104-FY-21-122-A (formerly FF 009-0-2, Spanish) for registrants applying for disaster assistance telephonically or using paper versions of the forms.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. 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.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. By the applicant’s name, address, social security number, demographic identifiers (race, ethnicity, gender, marital status, education), and email address.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Each registrant is issued a Registration Identification (ID) number</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. DAP 8-1.</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. Disposition schedule: TEMPORARY. Retire to inactive storage when 2 years old. Destroy when 6 years 3 months old.</p>
<p>f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i></p>	
<p><input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.</p>	
<p>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.</p> <p>Demographic information in the form of aggregated statistics may be provided to the Office of Equal Rights (OER) for monitoring purposes. Individual demographic information may be provided to OER upon receipt of applicant inquiries or OER investigation of applicant complaints.</p> <p><input checked="" type="checkbox"/> Yes, information is shared <i>external</i> to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.</p>	

² 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.



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.



**Homeland
Security**

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



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:	Everson (Randy) Hull
Date submitted to component Privacy Office:	December 28, 2022
Date submitted to DHS Privacy Office:	December 28, 2022
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. Click here to enter text.
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>	
PIA: DHS/FEMA—026 Operational Data Store and Enterprise Data Warehouse (August 2018). DHS/FEMA—049 Individual Assistance (IA) Program (January 2018). SORN: DHS/FEMA—008 Disaster Recovery Assistance Files (February 10, 2022).	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Laquitta Murray (Schuntel Reddock)
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	January 18, 2023
PTA Expiration Date	January 18, 2026

DESIGNATION

Privacy Sensitive IC or Form:	Yes If "no" PTA adjudication is complete.
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:	e(3) statement update is required. e(3) statement updated statement submitted and approved.
PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/FEMA-026 Operational Data



	Store and Enterprise Data Warehouse; DHS/FEMA-049 Individual Assistance (IA) Program
	If a PIA update is required, please list: Click here to enter text.
SORN:	<p>System covered by existing SORN If covered by existing SORN, please list: DHS/FEMA-008 Disaster Recovery Assistance Files, February 10, 2022, 87 FR 7852, DHS/FEMA-017 Individuals and Households Program Equity Analysis Records System of Records, August 3, 2022, 87 FR 47439 If a SORN update is required, please list:</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>FEMA is submitting this form PTA to document Streamline Registration Intake (RI) process information collection. The purpose of this system is to provides financial assistance and, 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.</p> <p>Using the forms Streamline Registration Intake forms, applicants for disaster assistance can select the type of assistance they require and only answer questions directly related to the specific types of assistance they need.</p> <p>DHS PRIV agrees this form is privacy sensitive, requiring both PIA and SORN coverage. PIA coverage is provided by DHS/FEMA-049 Individual Assistance (IA) Program, which covers the collection, use, maintenance, retrieval, and dissemination of personally identifiable information (PII) of applicants for the purpose of implementing the FEMA IA programs. Additional PIA coverage is provided by DHS/FEMA-026 Operational Data Store and Enterprise Data Warehouse, which covers the collection, use, maintenance, retrieval, and dissemination of information pulled from the source systems.</p> <p>SORN coverage is required because information is retrieved by a unique identifier. SORN coverage is provided by DHS/FEMA 008 Disaster Recovery Assistance Files, which covers FEMA-approved Weapons of Mass Destruction (WMDs) training and information. Additional SORN coverage is provided by DHS/FEMA-017 Individuals and Households Program Equity Analysis, which covers the collection and maintenance of records on applicants for disaster assistance programs.</p>	