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February 26, 2026

GENERAL MEMORANDUM 26-009

Treasury Proposes New Record System to Collect Data on Financial Assistance Program Beneficiaries

The U.S. Department of the Treasury published a [notice](#) proposing to establish a new Privacy Act system of records titled *Department of the Treasury, Departmental Offices DO .0197—Financial Assistance Programs*. Written feedback is due by **March 6, 2026**. Please let us know if you would like our assistance drafting comments.

The proposed record system will contain information collected in connection with the administration, oversight, and evaluation of Treasury financial assistance programs. Covered programs include the following, among others Treasury deem applicable:

- Coronavirus State and Local Fiscal Recovery Funds,
- Local Assistance and Tribal Consistency Fund,
- Capital Projects Fund,
- Emergency Rental Assistance,
- Homeowner Assistance Fund,
- Social Impact Partnership to Pay for Results Act, and
- State Small Business Credit Initiative.

The records will cover individual beneficiaries and recipients, subrecipients, contractors, and vendors involved in the programs. Information collected may include, but is not limited to:

- full legal name;
- application identification numbers;
- residential address and contact information;
- household financial information;
- self-attestations and signatures;
- amounts of assistance received;
- periods of assistance;
- information about employees or owners of recipients, subrecipients, contractors, or business beneficiaries; and
- demographic and financial information, including Social Security numbers and taxpayer identification numbers.

Treasury states that it intends to use the information to administer programs, assess compliance with federal requirements, conduct audits and oversight, investigate fraud and abuse, and support research and statistical analysis. The notice also outlines data-sharing uses with federal and non-federal entities for purposes such as program integrity, law enforcement, litigation, and research.

This may raise some privacy and administrative burden considerations for Tribes, as the record system would include personally identifiable and financial information about individual Tribal beneficiaries and others who received support from the covered programs. The proposal also allows sharing with governmental and partner organizations for oversight purposes.

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