



Privacy Impact Assessment  
for the

Individual Assistance (IA) Program

**DHS/FEMA/PIA-049**

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**Contact Point**

**Christopher B. Smith**

**Office of Response and Recovery**

**Federal Emergency Management Agency**

**(202) 646-3642**

**Reviewing Official**

**Philip S. Kaplan**

**Chief Privacy Officer**

**Department of Homeland Security**

**(202) 343-1717**



## Abstract

The U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Individual Assistance Division manages the Individual Assistance (IA) programs. These programs provide disaster recovery assistance to individuals and support FEMA's recovery mission under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act), through the collection and processing of disaster survivor information obtained through electronic or paper-based means. FEMA is publishing this Privacy Impact Assessment (PIA) to broadly cover the collection, use, maintenance, retrieval, and dissemination of personally identifiable information (PII) of applicants for the purpose of implementing the FEMA IA programs.

## Overview

Individual Assistance (IA)<sup>1</sup> is authorized when a Governor or Tribal Chief Executive requests federal assistance and the President of the United States declares a major disaster or emergency.<sup>2</sup> The Governor's or Tribal Chief Executive's request for assistance may include any of the following: IA, Public Assistance (PA), or Hazard Mitigation Assistance (HMA). FEMA may begin the initial collection of individual applicants' information once a Presidential declaration has occurred or may be imminent for a major disaster or emergency.

The IA Division's mission is to ensure that disaster survivors have timely access to a full range of programs and services to maximize their recovery. To support this mission, the IA Division operates the IA programs, which include the Individual and Households Program (IHP) and the Transitional Sheltering Assistance (TSA) program. The IHP<sup>3</sup> provides financial assistance and direct services to those who have necessary expenses and serious needs as a direct result of a disaster and are unable to meet those needs through other means. The TSA program provides survivors with lodging in hotels or motels that are paid directly by FEMA. The provision of IHP and TSA requires FEMA to collect, use, maintain, and share PII and sensitive PII (SPII)<sup>4</sup> from applicants, and this is accomplished through various information technology (IT) systems, applications, and forms. FEMA is publishing this PIA to discuss the IHP and TSA from a programmatic standpoint, to include the IHP and TSA's initial collection of information, its

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<sup>1</sup> Individual Assistance refers to money or direct assistance to eligible individuals and households whose property has been damaged or destroyed as a direct result of a major disaster or emergency and whose losses are not covered by insurance or other means.

<sup>2</sup> 42 U.S.C. §§ 5121-5207.

<sup>3</sup> 42 U.S.C. § 5174(a)(1).

<sup>4</sup> SPII refers to the use of the Social Security number, bank account information, and limited medical information. For the purposes of this document, "PII" will be used to refer to both regular PII and SPII.



eventual use and storage, and the associated technologies and tools used to support the program. With the publication of this PIA, the following PIAs have been retired:

- DHS/FEMA/PIA-001 Emergency Preparedness and Response (EP&R) Individual Assistance (September 21, 2004).
- DHS/FEMA/PIA-012a Disaster Assistance Improvement Program (DAIP) (November 16, 2012).
- DHS/FEMA/PIA-027 National Emergency Management Information System-Individual Assistance (NEMIS-IA) (June 29, 2012).
- DHS/FEMA/PIA-038(a) Virginia Systems Repository (VSR): Data Repositories (May 12, 2014).

## **Individuals and Households Program**

The most prominent IA program is the IHP, which requires the collection of certain PII in order to properly administer the program. IHP provides financial assistance and direct assistance in the form of temporary housing assistance to those who have necessary expenses and serious needs as a direct result of a disaster and are unable to meet those needs through other means.<sup>5</sup> IHP consists of Housing Assistance (HA) and Other Needs Assistance (ONA), which comprise the core services that FEMA provides directly to eligible individuals and households.

HA provides financial or direct assistance to individuals or households whose property has been damaged or destroyed by a major disaster or emergency and whose losses are not covered by insurance. HA may consist of Lodging Expense Reimbursement, Rental Assistance, Direct Temporary Housing Assistance, Repair Assistance, Replacement Assistance, or Permanent or Semi-Permanent Housing Construction. ONA provides financial assistance for disaster-related necessary expenses and serious needs that are not covered by insurance. To determine the assistance needs of an applicant, National Processing Service Center (NPSC)<sup>6</sup> representatives may ask medically-related questions to determine what types of durable medical equipment may have been lost or damaged due to the disaster, or what modifications to FEMA-provided housing may be necessary to make a dwelling safe for an applicant or household member with access and functional needs. State, territorial, or tribal governments may elect to administer ONA themselves or jointly with FEMA. If ONA is being administered jointly, state, territorial, or tribal government

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<sup>5</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), available at [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).

<sup>6</sup> NPSCs are call centers where survivors can call FEMA's toll-free phone number to apply for assistance or check the status of an existing application. FEMA operates three NPSCs located in Denton, TX, Hyattsville, MD, and Stephenson, VA, and these sites are staffed year-round and have the capability to expand with additional staff within five hours of a Presidential disaster declaration.



users will have access to the State Web Module in National Emergency Management Information System-Individual Assistance (NEMIS-IA), FEMA's master database that supports the administration of various available disaster assistance programs.

### **Transitional Sheltering Assistance (TSA)**

FEMA may provide TSA to applicants who are unable to return to their pre-disaster primary residence because their home is uninhabitable or inaccessible due to a Presidentially-declared disaster. TSA is intended to reduce the number of disaster survivors congregating in shelters by quickly transitioning survivors into short-term accommodations through direct payments to lodging providers.

In order to move individuals out of temporary shelters and into transitional accommodations, such as hotels and motels, FEMA will survey survivors in temporary shelters, sometimes prior to their formal registration for assistance. These surveys will include contact information, FEMA registration status, and TSA eligibility or rental assistance eligibility. If the individual is not registered for FEMA assistance, FEMA will also deploy a strike team<sup>7</sup> to register the individual for IA. Once they are registered, the data that was collected in the temporary shelters will be correlated against the formal registration data. If found eligible for TSA assistance, applicants' PII may be shared with lodging providers in order to transition the applicant into short-term accommodations. This determination is made automatically when an applicant first applies for assistance, and his or her PII is only shared if found eligible.

### **Disaster Assistance Improvement Program (DAIP)**

Under Executive Order (EO) 13411, FEMA was required to simplify the process of identifying, applying for, and checking the status of disaster assistance.<sup>8</sup> As a result, FEMA implemented the Disaster Assistance Improvement Program (DAIP), which provides a single point of collection for disaster survivor information, regardless of whether a survivor applies for assistance online<sup>9</sup> or via phone. DAIP initiates the collection of information relevant to all disaster assistance programs. Through established criteria and programs, DAIP then disseminates the information to other federal agencies and to NEMIS-IA. During this time, DAIP also performs verification of records and checks for duplication of benefits.

EO 13411 also required FEMA to "strengthen controls designed to prevent improper payments and other forms of fraud, waste, and abuse." The DAIP IT system automatically flags potentially duplicate records, which alerts FEMA personnel that the record should be manually

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<sup>7</sup> A strike team is a group of FEMA personnel deployed to a disaster-affected area to assist survivors in applying for IA.

<sup>8</sup> Executive Order 13411, "Improving Assistance for Disaster Victims." 71 FR 52729 (September 6, 2006). Available at <https://www.gpo.gov/fdsys/pkg/WCPD-2006-09-04/pdf/WCPD-2006-09-04-Pg1527.pdf>.

<sup>9</sup> [www.DisasterAssistance.gov](http://www.DisasterAssistance.gov).



reviewed, and prevents the applicant from receiving any assistance until the potential duplicate is resolved. FEMA further prevents survivors from receiving duplicate benefits by sharing survivor information with participating federal agencies, enabling them to adjust or offset disbursements to survivors as required under 44 CFR § 206.191. In furtherance of this requirement, FEMA has established Computer Matching Agreements (CMA) with the U.S. Department of Housing and Urban Development (HUD) and the Small Business Administration (SBA) as a measure to prevent applicants from receiving duplicate benefits. FEMA's CMAs are discussed further in section 6.2.

### IT Systems

FEMA operates and uses the following IT systems to support the administration of the IA program and processes. These IT systems facilitate various functions to help FEMA assess and meet the needs of survivors. While they are separate IT systems, they all use the same PII data elements, and receive PII from the same, original data sources—the survivor applicants themselves. The data is collected once during the survivor's initial contact with FEMA and it flows into the IT systems outlined below:

- DAIP<sup>10</sup> is the initial collection point for applicant PII, and is the IT system that NPSC staff enter survivor information into in order to initiate a survivor's application for FEMA assistance. The DAIP IT system then disseminates applicant information to NEMIS-IA and to other federal agencies to support the administration of available disaster assistance programs.
- NEMIS-IA<sup>11</sup> is the IT system that houses survivor case files and is the master database that FEMA uses to administer its assistance programs and make disaster assistance decisions.
- VSR<sup>12</sup> is a platform that supports Temporary Sheltering Assistance (TSA) and houses numerous applications that provide support to various IA functions, including Continued Rental Assistance, communications with staff at an NPSC, and communications to applicants.
- Disaster Management and Support Environment (DMSE) Cloud Environment (CE)<sup>13</sup> is ultimately where the information collected by Disaster Survivor Assistance (DSA) mobile application is stored.

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<sup>10</sup> See Appendix A, p. 54.

<sup>11</sup> See Appendix A, p. 49.

<sup>12</sup> See Appendix A, p. 58.

<sup>13</sup> See Appendix A, p. 62.



- Automated Construction Estimating (ACE)<sup>14</sup> is the tool that field inspectors use to collect and store inspection data of properties damaged during a disaster. ACE receives survivor PII from NEMIS-IA in order to schedule and conduct housing inspections.
- FEMA IHP Program Management Section Customer Resource Management portal<sup>15</sup> supports the IHP Helpdesk that FEMA uses internally to track issues with applicants' files.

Through the use of the IT systems and tools, FEMA is able to administer its assistance programs and fulfill the needs of IA applicants. They also help FEMA provide and improve customer service by making the relevant information more easily accessible to FEMA personnel who provide IA services and by reducing the wait times for applicants requesting IA services. In order to accomplish their intended purposes, these systems may use a variety of disaster survivor PII, up to and including the full dataset collected from the survivor's initial application.<sup>16</sup>

Having an interconnected network of systems allows survivor information to be collected once, minimizing the data files necessary to complete the registration process, and enables the information to be disseminated to the authorized agencies that are part of the disaster assistance process. Ultimately, data in NEMIS-IA is replicated into the Enterprise Data Warehouse/Operational Data Store,<sup>17</sup> in order to allow FEMA to conduct reporting and analysis to inform leadership and to improve customer service in the future.

The PII stored in each IT system is only that which is necessary to allow the IT system and FEMA personnel to perform their job functions, and access is only granted to specific IT systems based on mission need and an individual's need to know.

## **Disaster Assistance Application Process**

Survivors' first interaction with FEMA is typically through the website [www.disasterassistance.gov](http://www.disasterassistance.gov), or through the FEMA Helpline, where they can speak with a NPSC representative. However, in some circumstances, FEMA may pre-register survivors who are not already registered for disaster assistance by surveying them for their contact information and registration status in order to rapidly provide access to TSA and move them out of temporary mass-care shelters. Survivors requesting disaster assistance online use the pre-screening questionnaire<sup>18</sup> service hosted on [www.disasterassistance.gov](http://www.disasterassistance.gov) to identify types of assistance for which they may be eligible, and then they may choose to register directly for assistance. The pre-screening

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<sup>14</sup> See Appendix A, p. 70.

<sup>15</sup> See Appendix A, p. 72.

<sup>16</sup> See OMB 1660-002: FEMA Form 009-0-001.

<sup>17</sup> See DHS/FEMA/PIA-026 Operational Data Store (ODS) and Enterprise Data Warehouse (EDW) (June 29, 2012), available at [https://www.dhs.gov/sites/default/files/publications/privacy\\_pia\\_fema\\_026\\_2012.pdf](https://www.dhs.gov/sites/default/files/publications/privacy_pia_fema_026_2012.pdf).

<sup>18</sup> The website [www.disasterassistance.gov](http://www.disasterassistance.gov) and the pre-screening questionnaire is hosted by the U.S. Department of Labor (DOL), but all of the information collected from applicants is not shared with DOL; rather, all applicant PII is entered directly into the DAIP IT system.



questionnaire provides a list of the types of assistance and the option to print the assistance descriptions at a later time or to email assistance descriptions as a reference for later.

To apply for disaster assistance, survivors have four options: visit the website [www.disasterassistance.gov](http://www.disasterassistance.gov) (mobile or full desktop site), call the FEMA Disaster Assistance Helpline and speak to an NPSC representative, register directly with a member of the DSA cadre,<sup>19</sup> or apply using paper forms at a Disaster Recovery Center (DRC).<sup>20</sup> Survivors may also check the status of their registration by creating or accessing an online account on [www.disasterassistance.gov](http://www.disasterassistance.gov). If a survivor decides to apply online, he or she uses FEMA's online Disaster Assistance Center (DAC) to complete the registration process. If a survivor chooses to register in person with a DSA cadre member, the DSA cadre member collects the survivor's PII using a FEMA-issued mobile device and enters it directly into DAIP. If a survivor calls the Disaster Assistance Helpline, an NPSC representative will read a Privacy Notice, collect the survivor's PII, and enter it into DAIP.

Regardless of the method of registration, FEMA collects the survivor and co-applicant's<sup>21</sup> PII to determine whether the survivor is eligible for FEMA assistance. The survivor either enters the information into the online form or provides the information directly to the DSA or NPSC representative. This information includes name, date of birth, and Social Security number (SSN) of the applicant and co-applicant, as well as address, household bank account information, contact information, the names and ages of all occupants, information about the damaged dwelling, ownership or renter status, insurance information, disaster-related expenses (medical, dental, child care), disaster-related vehicle damage, emergency needs, business damage, and income information.

Regardless of the method of registration, the information collected from survivors is initially entered into DAIP. DAIP then disseminates the information to NEMIS-IA and the other IA IT systems that require the information to accomplish their purposes in facilitating the IA process. DAIP disseminates information based on eligibility determination, and NEMIS-IA determines the following: FEMA Disaster Registration Number, which is a unique identifier for the applicant's file; Application Status ("In-Process," "Submitted" "Approved," or "Denied");

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<sup>19</sup> The mission of the DSA program is to build and sustain an expeditionary workforce that can establish a timely presence primarily focused on addressing the needs of disproportionately impacted populations and disaster survivors. DSA cadre members register survivors for disaster assistance, provide guidance on the registration process, and provide an overview of the assistance available through FEMA.

<sup>20</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), p. 31, *available at* [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).

<sup>21</sup> A co-applicant is often included to allow an individual other than the main applicant to be able to check the status of the application. Under most circumstances, the co-applicant and the applicant are spouses or domestic partners. If the co-applicant is not listed as such, FEMA personnel cannot discuss the application status or reveal any details of the application to that individual. Without a co-applicant, FEMA can only discuss the application status with the original applicant.



Housing Inspection Required (Y/N); Priority of Assistance; Type of Assistance being considered; and time stamps.

Once an application is completed, FEMA sends out a hard-copy version to the applicant, so that he or she has a chance to review it for accuracy. An important part of the mail-out package is the Eligibility Determination Letter, which explains to the survivor the types of benefits for which FEMA has found them to be eligible.<sup>22</sup> This mail-out package also includes instructions on the appeal process, as well as a redress notice. This mail-out package is sent automatically, unless an applicant opts out of receiving it and chooses instead to receive all correspondence electronically.

After completing the initial registration, survivors are required to submit proof of the following items, as appropriate: identity, such as a driver's license or passport; home ownership; residential rental leases; insurance; medical bills, in the event of a disaster-related medical condition; and tax forms. Other substantiating documentation may also be submitted (e.g., photographs of damage) dependent upon the circumstance. Survivors can submit this documentation through [www.disasterassistance.gov](http://www.disasterassistance.gov), by faxing it, or by mailing directly to FEMA. After receipt, the documents are stored in FEMA's enterprise document management system, Document Management and Records Tracking System (DMARTS).<sup>23</sup>

In order to monitor their application status or update their information, survivors may establish a User ID, password, and personal identification number (PIN) to create an online account at [www.disasterassistance.gov](http://www.disasterassistance.gov). Only survivors who wish to gain access to their application information will need to create an account. Otherwise, no account is required in order to receive assistance.

### **Third-Party Validation**

To prevent fraud, IHP uses third-party validation services to validate an applicant and co-applicant's identities and the accuracy of the address provided.

When a survivor initiates a request for disaster assistance, FEMA requests the survivor's name, address, SSN, and date of birth. The DAIP routes this to a third-party identity proofing (IdP) service to conduct identity authentication. The IdP authentication service generates knowledge-based questions that verify information through financial transactions, public records, and other services. An individual must correctly answer the IdP questions in order to authenticate his or her identity and continue the application process. In cases in which the applicant registers online, via the FEMA mobile website or by telephone, the IdP service will return a "pass/fail" flag notifying

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<sup>22</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), p. 37, available at [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).

<sup>23</sup> DHS/FEMA/PIA-009(a) Document Management and Records Tracking System (DMARTS) (May 15, 2013).





the applicant of his or her status in a matter of seconds. Applicants registering via the paper form will only be notified of a “fail” flag by FEMA staff.

If FEMA receives a “fail” flag,<sup>24</sup> FEMA staff will review, directly with the applicant, the accuracy of the name spelling, date of birth, and SSN recorded in the registration. If his or her identity still remains flagged as “fail,” and FEMA cannot validate that particular applicant’s identity, FEMA staff will ask if there is another household member whose name and SSN could be used to complete the registration for the household. If so, FEMA staff will communicate with the new household member and restart the registration using his or her information as the primary registrant. If no other household member is able to verify his or her own identity, the caller will be advised that assistance cannot be processed unless an identity is verified and the caller should submit identity verification documents to FEMA via fax or mail as soon as he or she is able. The initial application may be completed without identity verification, but any assistance determinations will not occur until after FEMA validates the applicant’s identity.

The following are acceptable documents that applicants may submit to FEMA for the purpose of identity verification:

- Documentation from the Social Security Administration (SSA), or other federal entity, containing full or last four digits of the SSN;
- Social Security card, if accompanied by federal or state-issued identification;
- Employer’s payroll document containing full or last four digits of the SSN;
- Military identification;
- Marriage license to confirm proof of maiden name—if identity verification still fails using the maiden name, a different identity document will need to be submitted;
- United States passport; and,
- On a case-by-case basis, FEMA may allow applicants residing in U.S. territories to submit specific identity documents, such as voter registration cards.

Once the identity is verified, FEMA determines whether the applicant is eligible for assistance through the IHP, and the applicant’s PII is routed and stored in the NEMIS-IA system to begin processing. Once the PII is in the NEMIS-IA system, FEMA is able to determine the types and amounts of assistance for which the applicant may be eligible.

Should a survivor wish to create an online account for the purpose of checking the status of or performing limited updates to his or her registration, the same information taken from

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<sup>24</sup> A “fail flag” would typically occur when a potential applicant answers too many of the screening questions incorrectly.



publicly available and commercial sources is also used by the third-party IdP service to generate four questions that are used to authenticate the survivor.

IHP also validates address information and property ownership records against public records. This process validates the site address, the flood plain mapping information for the address, the Assessor's Parcel Number (APN),<sup>25</sup> property records, and the specific latitude and longitude coordinates. This is an automated process that validates the submitted damaged dwelling's address using a commercial database. This is necessary to update invalid addresses that are either entered incorrectly or to identify those addresses that require more information to verify. This process serves as a reliable source for accurate addresses. It helps FEMA provide timely assistance to survivors during disaster recovery, and avoids deficiencies or delays that could occur due to inaccurate or incomplete address information.

### **Collecting Additional Information**

FEMA IA may reach out to a survivor to request additional information in the event that an application is incomplete, or to verify the survivor's current information (e.g., continuing need for rental assistance). These call-outs are supported by the Virginia Systems Repository (VSR)<sup>26</sup> and the data collected is described in Appendix A. VSR has a sub-application called the Callout and Review System (CARS) that reminds NPSC staff that additional information is needed from a particular survivor and that the survivor should be contacted in order to gather this information. Applicants whose files are incomplete are put into a queue, which controls the number of times FEMA contacts them and allows the survivor to schedule a specific callback time.

### **FEMA Field Personnel**

#### ***Onsite Inspections***

In order to validate an applicant's disaster-caused losses, FEMA staff or contracted inspectors conduct onsite inspections. Not all applicants require an onsite inspection. For example, applicants with no reported real or personal property damage, or with damage believed to be fully covered by insurance, are not inspected. For those registrations that do require onsite inspections, ACE assigns inspectors to perform onsite inspections and confirm damage to applicants' real and personal property (e.g., home, car, furniture).

FEMA uses the PII originally collected from survivors during the IHP application process to enable inspectors to inspect properties and store information pertaining to the damage caused by a disaster using mobile devices and the ACE application, discussed in the Appendix.<sup>27</sup> The

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<sup>25</sup> The APN is a tax record number that is associated to the specific property parcel. When this APN is available, it can also be tied with data about that parcel such as the building size, the number of bedrooms in the building, and whether it is a mobile home.

<sup>26</sup> See Appendix A, p. 58.

<sup>27</sup> See Appendix A, p. 70.



inspectors use the information to confirm the applicant's registration data by verifying the applicant's identification, address, and telephone numbers. Inspectors will also capture relevant information while they are with the applicant in order to verify the damage to a property. Once the inspection is complete, the inspector uploads the data from the onsite inspection into ACE. The results of the onsite inspection collected by FEMA housing inspectors are used to determine the level of assistance that may be provided to the survivor.

In some instances, inspectors may update applicant information in order to correct information within NEMIS-IA. In such instances, the information is transmitted to FEMA's IA IT systems and the data is rerun against the same identity verification processes to which the initial registration information was subject.

### *Disaster Survivor Assistance (DSA) Cadre*

In addition to home inspections, field inspections, not specifically focused on applicant dwellings, may be conducted by members of FEMA's DSA cadre. While in the field, cadre members use a mobile application, DSA Smart,<sup>28</sup> that allows them to input information gathered during field inspections. This information may include mapping data, situational awareness of disaster areas, and any other information disaster survivors report (non-PII). Survivors typically report downed trees and power lines, flooded roads, and other disaster-related safety and recovery issues. These reports provide actionable, timely, and comprehensive summary status reports that are designed to inform leadership decision-making. DSA cadre members help to identify general survivor needs and describe any broad-based trends or the need for increased support in the impacted area. The DSA cadre uses the DMSE CE<sup>29</sup> tool to collect and store information from survivors. The information is then aggregated to provide leadership with operational and localized information about a disaster to enable better operational decision-making, including scalability decisions based upon accurate estimates of the size and breadth of a disaster. In the event that the DSA cadre meets survivors that have not yet registered for FEMA assistance, DSA cadre members will assist the survivor in applying for assistance through [www.disasterassistance.gov](http://www.disasterassistance.gov).

### **Appeals/Recoupment/Oral Hearings Process**

#### *Appeals*

Applicants who disagree with FEMA's eligibility determination on their case have the right to submit a written appeal to the FEMA NPSC for a review of their case.<sup>30</sup> The applicant's appeal letter must explain the reasons for the appeal and must be signed by the applicant or person who the applicant authorizes to act on his or her behalf. Applicants must file an appeal contesting their initial eligibility determination within sixty days of the date on their Eligibility Notification

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<sup>28</sup> See Appendix A, p. 62.

<sup>29</sup> See Appendix A, p. 62.

<sup>30</sup> 42 U.S.C. § 5189a; 44 CFR § 206.115.



Letter.<sup>31</sup> The appeal submission must either be notarized or submitted by the individual under penalty of perjury as a substitution for notarization.<sup>32</sup> The appeal should also include the following information:

- Applicant's/Co-applicant's full name;
- Applicant's/Co-applicant's FEMA registration ID;
- FEMA Disaster Number (generated by FEMA, provided to survivors via NPSCs, Disaster Recovery Centers, etc.);
- Address of the Applicant's/Co-applicant's pre-disaster primary residence; and,
- Applicant's/Co-applicant's current phone number and address.

Applicants/Co-Applicants may appeal the following determinations:

- Initial eligibility determinations for Housing Assistance and ONA, including:
  - The amount or type of Housing Assistance and ONA an applicant received;
  - The decision to withdraw an application for FEMA disaster assistance;
  - The recovery of funds improperly awarded to an applicant; and,
  - The denial of a late application request for assistance.
- A denial for Continued Rental Assistance
- Direct Housing Assistance determinations, including:
  - The termination of eligibility to remain in a FEMA-provided mobile housing unit (MHU);
  - FEMA's intent to collect rent or the amount of rent collected from occupants of a FEMA-provided MHU;
  - A denial of a request to purchase a FEMA-provided MHU;
  - The sales price of a FEMA-provided MHU the applicant may want to purchase; and,
  - Any other eligibility-related decision.

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<sup>31</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), p. 26, available at [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).

<sup>32</sup> 6 CFR 5.21(d).



## ***Recoupment***

FEMA regularly performs internal audits of disaster assistance payments to ensure taxpayer dollars were properly spent. Those reviews often show a small percentage of specific cases in which disaster assistance was given to applicants who were not eligible for some or all of the money they received. FEMA may also identify errors while processing additional disaster assistance or appeals. FEMA may recover these funds through a process called “recoupment.”<sup>33</sup>

FEMA employs a deliberative process to identify and verify payments that must be recouped and established as debts. This process involves multiple levels of FEMA staff and management review and validation before a debt is established. When FEMA determines assistance was given to applicants who were not eligible for some or all of the money received, FEMA IA program staff notifies the applicant in writing of his or her potential debt and his or her right to appeal the decision. Prior to recoupment, FEMA will, whenever possible, attempt to obtain additional information that may demonstrate that the funds do not need to be repaid by contacting the applicant, contractors, landlords, insurance companies, or other third parties.

FEMA requests the return of IHP Assistance for the following reasons:

- Duplication of benefits, which occurs when FEMA provides funds that were also previously received from another source, such as insurance or another federal agency. A duplication of benefits may also occur when multiple applicants in a household receive an award for the same item or type of assistance.<sup>34</sup>
- Assistance provided in error, which occurs when FEMA determines an applicant was provided assistance for which he or she is not eligible.
- Funds spent inappropriately, which occurs when FEMA determines the applicant spent the funds on ineligible items (e.g., using assistance to pay off credit card debt).
- Potential fraud, which occurs when FEMA determines the applicant obtained the assistance through false means (e.g., false address, submitting false or altered documents, misrepresenting insurance coverage).

In the event of potential fraud, the investigation and the associated files are handled by FEMA’s Office of the Chief Security Officer’s Fraud and Internal Investigations Division. This activity will be covered under a separate, forthcoming System of Records Notice (SORN) and PIA. However, because these files originate as IA Disaster Registration files and will end up back in IA to allow for the recoupment process to occur, they are being mentioned in this PIA.

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<sup>33</sup> 44 CFR § 206.116.

<sup>34</sup> 44 CFR § 206.191.



Once FEMA has determined that the applicant was awarded more assistance than that for which he or she was eligible, FEMA IA staff will send the applicant a written “Notice of Potential Debt” identifying all of the following:

- The amount of assistance the applicant received for which FEMA has determined the applicant is ineligible;
- The reason(s) the applicant is not eligible for the assistance provided;
- The process for appealing the decision, including the process for requesting an oral hearing;
- The documentation required to dispute the ineligibility determination; and,
- The notice that a final determination will be provided to the applicant informing the applicant whether a debt is owed.

Applicants who disagree with the potential debt amount or reason may submit a written appeal or request for an oral hearing within 60 days of the date on the FEMA potential debt notification letter.

### ***Notice of Potential Debt and Appeal Process: Oral Hearings***

Applicants may request an oral hearing as part of their written appeal. FEMA will only grant oral hearings in limited cases, such as when there is an issue of identity theft, credibility, or truthfulness, and the case cannot be decided solely on the review of documents. If the Oral Hearing Officer decides not to grant an oral hearing, that decision is final and cannot be appealed.

### ***Appeal Determination***

FEMA evaluates an applicant’s case and appeal and makes a final written decision within 90 days after receiving the appeal, or 90 days after concluding the oral hearing. FEMA’s decision is considered a final agency decision and may not be appealed again.

FEMA may approve an applicant’s appeal challenging the reason for the potential debt or the amount of the potential debt after FEMA reviews the appeal. When FEMA approves an appeal for the reason of the potential debt, FEMA terminates the debt and returns any money the applicant paid to FEMA. When FEMA approves an appeal for any percentage of the potential debt, FEMA adjusts the amount of the debt based on the appeal decision and returns any money that was collected in excess of the award or implements debt collection activities for any remaining debt.

FEMA may also deny an applicant’s appeal challenging the reason or amount for the potential debt after review of the appeal. FEMA establishes the debt amount after the appeal period expires and all decisions are rendered on any appeals received, and forwards the debt to



the FEMA Financial Center (FFC) to implement debt collection activities. As part of the debt collection activities, the FFC provides each applicant the opportunity to make payment arrangements. Applicants that do not make payment arrangements will have their debt forwarded to the United States Department of Treasury to implement further debt collection activities.

## **Other Federal Partners**

As a further means of improving the customer service that FEMA provides to survivors, especially during large-scale disasters, FEMA has partnered with the Internal Revenue Service (IRS) to increase the available number of representatives who can take survivors' disaster assistance application calls and provide helpline support. Although the IRS is currently FEMA's only partner, FEMA is seeking to partner with other federal agencies with large-scale call center capabilities.

FEMA and the IRS have memorialized this partnership through an Interagency Reimbursable Work Agreement (IRWA) that defines the IT security requirements, privacy requirements, rules of behavior, as well as the IRS's duty to discipline any IRS agent who inappropriately accesses or misuses the data found FEMA's IT systems. The IRS agents who support FEMA undergo a background check to ensure that the IRS agents are appropriately vetted and should be granted access to FEMA's IT systems. In order to gain a FEMA Enterprise Identity Management System (FEIMS)<sup>35</sup> account, which is required for accessing NEMIS-IA, the IRS agents must pass cybersecurity and privacy training, as well as agree to the FEMA Rules of Behavior. Once the IRS agents have a FEIMS account, they are also required to undergo DHS's annual cybersecurity training and privacy training.

The IRS agents connect directly to the FEMA network through a virtual private network (VPN) that is accessible through a browser. The IRS agents use a User ID and password in order to access the FEMA Enterprise Network (FEN), and once the connection is established, the IRS agents are fully behind the DHS firewall. From within the firewall, the IRS agents are able to access the registration intake system and NEMIS-IA based on their assigned user roles and permissions. The IRS agents are granted a limited role within NEMIS-IA to ensure that they are only able to access data for which they have a need to know. Each time the IRS agents access NEMIS-IA, they must agree to system monitoring and agree to use the system appropriately.

FEMA and the IRS are not engaging in information sharing, as all survivor PII is collected directly inside of FEMA's IT systems. FEMA requires the IRS to provide three laptops, located at a FEMA facility. The laptops provide FEMA with the ability to access the IRS call center's real-time call queues, agent availability, and retrieve historical reports for all FEMA calls routed to IRS facilities.

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<sup>35</sup> See DHS/FEMA/PIA-031 Authentication and Provisioning Services (August 6, 2013). Available at <https://www.dhs.gov/sites/default/files/publications/privacy-pia-fema-aps-20130806.pdf>.



For other participating department and federal agency programs, FEMA's IA IT systems electronically route relevant survivor information to the participating agencies' IT systems, to include the SSA,<sup>36</sup> HUD, and SBA. From within their [www.disasterassistance.gov](http://www.disasterassistance.gov) account, an applicant can also choose to apply for assistance from other federal agencies. In rare circumstances when survivors register first with HUD or SBA,<sup>37</sup> the applicant's PII is transferred to FEMA, according to the terms defined in the HUD-DHS/FEMA CMA<sup>38</sup> and the SBA-DHS/FEMA CMA.<sup>39</sup>

### **Application Status Messaging**

FEMA uses a third-party text message service to provide disaster survivors with registration status change notifications, should they opt in. The text message notifications to a survivor's mobile device are available for a select number of registration status changes.

SMS status notifications either in English or Spanish are sent from the DAIP to the third-party text message service, which dispatches the notification to a survivor's mobile phone. Status notifications only contain the FEMA Registration ID and are available for a variety of events. The SMS capability is expected to reduce the number of calls to FEMA NPSCs and visits to [www.disasterassistance.gov](http://www.disasterassistance.gov) by satisfying the survivor's desire for timely status change notifications without requiring the survivor to repeatedly call the Disaster Assistance Helpline or check their status online.

## **Section 1.0 Authorities and Other Requirements**

### **1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

The Stafford Act<sup>40</sup> allows the President to authorize FEMA to provide financial assistance to individuals and households in a state where, as a direct result of a major disaster, survivors incur necessary expenses and have serious needs that they are unable to meet through other means.<sup>41</sup>

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<sup>36</sup> FEMA has partnered with the SSA to enable applicants who currently receive Social Security benefits to automatically change their address to ensure continued receipt of benefits.

<sup>37</sup> This would occur if a survivor had a preexisting relationship with HUD or SBA, such as already receiving an SBA loan.

<sup>38</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.

<sup>39</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.

<sup>40</sup> 42 U.S.C. §§ 5121-5207.

<sup>41</sup> 42 U.S.C. § 5174; 44 CFR §§206.110-119.





Section 312 of the Stafford Act prohibits persons, business concerns, and other entities from receiving benefits from a loss that would duplicate financial assistance under other programs, from insurance, or from any other source.<sup>42</sup> Section 408 Stafford Act also requires that the President develop a system to verify the identity and address of recipients of assistance under this section to provide reasonable assurance that payments are made only to an individual or household that is eligible for such assistance.<sup>43</sup> FEMA uses the SSN in order to verify an individual's identity when he or she applies for assistance, and to ensure that no duplication of benefits are provided between FEMA, SBA, or HUD to any individual applicant. Section 502 of the Stafford Act<sup>44</sup> provides that the President provide assistance to survivors and communities, in accordance with Section 408 of this Act.

Other legal authorities and agreements include:

- The Homeland Security Act of 2002,<sup>45</sup> which assigns FEMA the responsibility to reduce the loss of life and property and protect the nation from all hazards, including natural disasters, acts of terrorism, and other man-made disasters by leading and supporting the nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation.
- The Clinger Cohen Act,<sup>46</sup> which provides guidance for multiagency investments and guidance for interagency support.
- Section 401 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996,<sup>47</sup> which defines which aliens are not qualified for federal public benefits.
- The Debt Collection Improvement Act of 1996,<sup>48</sup> which requires the head of an executive agency to collect the taxpayer identification number before making a payment to an individual; requires that a debt or claim owed to the United States that has been delinquent for 180 days be turned over by the head of the agency to the Secretary of the Treasury; and requires that the head of each federal agency require any person doing business with that agency furnish to that agency such person's taxpayer identifying number.
- The Economy Act<sup>49</sup> permits the head of an agency or major organizational unit within an agency to place an order for goods and services with another major organizational unit within that agency or to go to another agency for those goods and services.

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<sup>42</sup> 42 U.S.C. § 5155; 44 CFR § 206.191.

<sup>43</sup> 42 U.S.C. 5174(i).

<sup>44</sup> 42 U.S.C. 5192.

<sup>45</sup> 6 U.S.C. §§ 313-314.

<sup>46</sup> 40 U.S.C §§ 11303 and 11318.

<sup>47</sup> 8 U.S.C. §§ 1611.

<sup>48</sup> 31 U.S.C. §§ 3325(d), 3711(g), and 7701(c)(1).

<sup>49</sup> 31 U.S.C. § 1535.



- Section 4 of the Government Performance and Results Act of 2010,<sup>50</sup> which requires the head of each agency an annual report on agency performance on a public website and to the Office of Management and Budget.
- Executive Order 12862, “Setting Customer Service Standards,”<sup>51</sup> which requires agencies to set customer service standards, report on customer service, and develop customer service plans in order to improve the customer service that the agency provides to the public.
- Executive Order 13411, “Improving Assistance for Disaster Victims,”<sup>52</sup> provides for improving disaster assistance to the public by providing centralized access to all federally-funded disaster assistance programs, and also requires FEMA to strengthen controls designed to prevent improper payments and other forms of fraud, waste, and abuse.
- 5 U.S.C. § 301 – Departmental Regulations, which allows the head of an executive agency to prescribe regulations for the government of the agency; the conduct of its employees; the distribution and performance of its business; and the custody, use, and preservation of its records, papers, and property.
- Reorganization Plan No. 2 of 1970,<sup>53</sup> which requires the President, in order to improve economy and efficiency in the U.S. Government, to make a study of each agency to determine how the agency can be better organized, improve appropriations, assign particular activities to particular services, and regroup services.
- Executive Order 9397 “Numbering System for Federal Accounts Relating to Individual Persons,”<sup>54</sup> as amended by Executive Order 13478 “Amendments to Executive Order 9397 Relating to Federal Agency Use of Social Security Numbers.”<sup>55</sup>
- 44 U.S.C. § 3534 Federal Agency Responsibilities, which requires the head of each agency to provide information security protections for the agency’s information.

## **1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

The applicant information in the IA system is covered by the DHS/FEMA-008 Disaster Recovery Assistance (DRA) Files SORN.<sup>56</sup> The DHS/ALL-004 General Information

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<sup>50</sup> 31 U.S.C. § 1116.

<sup>51</sup> Executive Order 12862, “Setting Customer Service Standards,” 58 FR 176 (September 14, 1993).

<sup>52</sup> Executive Order 13411, “Improving Assistance for Disaster Victims,” 71 FR 52729 (September 6, 2006).

<sup>53</sup> 31 U.S.C. § 1111.

<sup>54</sup> Executive Order 9397, “Numbering System for Federal Accounts Relating to Individual Persons,” 8 FR 16095 (November 30, 1943).

<sup>55</sup> Executive Order 13478, “Amendments to Executive Order 9397 Relating To Federal Agency Use of Social Security Numbers,” 73 FR 70239 (November 20, 2008).

<sup>56</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



Technologies Access Accounts Records System SORN<sup>57</sup> covers the user information collected to grant access to the IA IT systems. The DHS/ALL-021 Department of Homeland Security Contractors and Consultants SORN<sup>58</sup> and the DHS/ALL-023 Department of Homeland Security Personnel Security Management SORN<sup>59</sup> cover the contact and background information of DHS contractors and consultants contained in the Virginia Systems Repository IT system.<sup>60</sup>

### **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

Yes. All associated systems have completed system security plans and have undergone the Assessment and Accreditation process.

### **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

- Under GRS-5.4, Item 080, Housing Rental and Lease Records are temporary and should be destroyed three years after lease termination, lapse, reassignment, rejection of application, cancellation of lease, or conclusion of litigation, as applicable.
- Under GRS-5.5, Item 020, mail, printing, and telecommunication control records are temporary and should be destroyed when one year old or when superseded or obsolete, whichever is applicable, but longer retention is authorized, if required for business use.
- DAA-0563-2012-0002-0007 provides that all mission activities photographs that provide adequate and proper documentation of mission activities are permanent. They must be cut off at the end of the calendar year in which they were created. FEMA must transfer to NARA in 3 year blocks at the end of the last year of the block, along with any related documentation and external finding aids in hard copy or electronic form.
- Under N1-311-86-001, Item 4C6b, any correspondence with insurance carriers that hold policies on disaster survivors' residences are temporary. These files must be consolidated at the appropriate regional office upon termination of the disaster (when all families have been relocated to permanent housing; the audit, if one is made, has been accepted by both FEMA and the state; and all monies due have been received). These records should be retired to a Federal Records Center (FRC) 1 year after termination, and they should be destroyed 3 years after termination.

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<sup>57</sup> DHS/ALL-004 General Information Technologies Access Accounts Records System 77 FR 70792 (November 27, 2012).

<sup>58</sup> DHS/ALL-021 Department of Homeland Security Contractors and Consultants 73 FR 63179 (October 23, 2008).

<sup>59</sup> DHS/ALL-023 Department of Homeland Security Personnel Security Management 75 FR 8088 (February 23, 2010).

<sup>60</sup> See Appendix A, p. 57.



- Under N1-311-86-001, Item 4C6c, correspondence files associated with the duplication of benefits are temporary. These files should be consolidated at the appropriate regional office upon closeout of Disaster Field Operations. They should be retired to an FRC 1 year after closeout, and destroyed 3 years after closeout.
- Under N1-311-86-001, Item 4C10a, all IA program files, except those relating to temporary housing and Individual and Family Grant programs, which include other programs such as Disaster Unemployment Assistance, Crisis Counseling and Training, Legal Services, Superfund, Flood Plain Management, Duplication of Benefits, and the Cora Brown Fund, are temporary. They must be retired to inactive storage when 2 years old, and destroyed when 6 years, 3 months old.
- Under N1-311-86-001, Item 4C10b, Temporary Housing Files, including copies of computer printouts scoreboards, Federal Coordinating Officer's digests, correspondence, and related records are temporary. They must be destroyed when database elements have been established and defined.
- Under N1-311-86-001, Item 4C10c, records relating to mobile home and travel trailer program files, including copies of correspondence and procedures, are temporary. These records should be cut off at the end of the calendar year, and destroyed 6 years and 3 months after cutoff.
- Under N1-311-86-001, Item 4C10d, files relating to permanent relocations under the Superfund and purchases of properties under the National Flood Insurance Act of 1968, as amended, 42 U.S.C. 4001, et seq., which include headquarters files relating to individual property owners, background data, addresses, value of property, negotiation records, and related records, are permanent. These records should be cut off at the conclusion of the project, retired to an FRC 3 years after cutoff, and then transferred to the National Archives in 5-year blocks 20 years after cutoff.
- N1-311-00-001, Item 1 provides that customer services satisfaction surveys that have been filled out and returned by disaster applicants are temporary. They should be destroyed upon the transmission of the final report.
- N1-311-00-001, Item 2 requires that statistical and analytical reports that are based on survey responses and document trends and recommend programmatic changes to disaster assistance are temporary. They should be cut off at the close of the report, retired to an FRC 3 years after cutoff, and destroyed 20 years after cutoff.
- N1-311-00-001, Item 3 requires that a composite of survey results per disaster are maintained in an agency-standard database. These records are temporary and should be destroyed when no longer needed for analytical purposes.



- N1-311-86-001, Item 4B6b requires that documents created in developing protection criteria for shelters in private homes, including drawings, specifications, home protection surveys, and other records on required protection for individual families in their homes are temporary. They should be cut off at completion of the contract and destroyed 3 years after cutoff.
- Per N1-311-04-05, Item 1, all records categories associated with September 11, 2001, and Hurricane Katrina permanent, per the FEMA records disposition manual. This disposition instruction is applicable to records, both paper and electronic, regardless of format or media. These records are permanent, and they should be cut off when all activity has ceased for the particular operations after. They should be transferred to an FRC 1 year after cutoff and transferred to the National Archives 20 years after cutoff.
- Per N1-311-04-05, Item 2, all records relating to Hurricane Katrina and September 11, 2001, which have temporary dispositions in the FEMA records disposition manual are temporary. Cutoff occurs when all activity has ceased for the particular operations area. They should be transferred to an FRC 1 year after cutoff and destroyed 75 years after cutoff.
- Per N1-311-04-05, all unscheduled records categories associated with Hurricane Katrina and September 11, 2001, remain unscheduled. These records should be cut off when all activity has ceased for the particular operations area. Programs in possession of these records should contact their local Records Liaison Officer or the Headquarters Information Management Division, Records Management branch to in order to develop a disposition schedule. Records should be transferred to an FRC 1 year after cutoff.
- Per N1-311-04-05, Item 3, all records associated with a domestic catastrophic event, to include September 11, 2001, and Hurricane Katrina are permanent, and should be cut off when all activity has ceased for the particular operations area. The records should be transferred to an FRC 1 year after cutoff, and transferred to the National Archives 20 years after cutoff. This category includes, but is not limited to, records relating to pre-response operations; the Presidential Declaration; Emergency Coordination (EC); Emergency Support (ES); Urban Search and Rescue response (US&R); Public Assistance (PA), including, but not limited to, project applications, original damage survey report, mission assignments, funding documents, project time extensions, applicant appeals, eligibility determinations, and documents on insurance requirement, policies, procedures; Individual Assistance (IA) records including, but not limited to, mission assignments, specific IA policies, and guidance/standard operating procedures(s) and correspondence with state and local officials; and Mitigation. This disposition instruction is applicable to records, both paper and electronic, regardless of format or media.



- N1-311-86-1, Item 4C8b(1), provides that master occupant/applicant files, containing all original occupant-related documents, such as site requests, mobile home sales documents, leases, or contracts, are temporary. These records should be consolidated at the appropriate regional office at the end of Phase II, when survivors in shelters are moved to permanent housing, retired to an FRC 1 year after the files are consolidated, and destroyed 6 years 3 months after the files are consolidated.
- Per N1-311-86-1, Item 4C8b(2), provides that working field applicant and occupant files are temporary. They should be reviewed at the end of Phase I operations (when all qualified applicants have received temporary housing) to ensure all occupant-related original documents are in the master occupant/applicant files or Mobile Home Storage Program files, as appropriate. These files should be destroyed when FEMA stops providing services to the occupant.
- Under N1-311-86-1, Item 4C8b(4), control records and logs relating to temporary assistance program files are temporary. These records should be forwarded to the appropriate regional office at the end of Phase II, retired to an FRC 1 year after the end of Phase II, and destroyed 6 years and 3 months after the end of Phase II.

**1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

The following forms are used to collect survivor PII, in order to provide IHP services and disaster assistance:

- OMB 1660-0002 Disaster Assistance Registration
- OMB 1660-0061 Federal Assistance to Individuals and Households Program
- OMB 1660-0030 Manufactured Housing Operations Forms
- OMB 1660-0138 Direct Housing Program
- OMB 1660-0011 Debt Collection Financial Statement
- OMB 1660-0042 Survivor Sheltering Assessment Tool



## Section 2.0 Characterization of the Information

### 2.1 Identify the information the project collects, uses, disseminates, or maintains.

#### Registration and Assistance Records:

- FEMA Disaster Number (generated by FEMA, provided to survivors via NPSCs, Disaster Recovery Centers, etc.);
- FEMA Registration ID;
- Applicant/Co-Applicant Information:
  - Full Name;
  - Social Security number or alien registration number;
  - Signature;
  - Date of Birth;
  - Phone numbers;
  - Email addresses;
  - Position Title;
  - Employer Name;
  - Language(s) spoken;
  - Number of Dependents Claimed;
  - User ID;
  - Password;
  - Personal Identification Number (PIN);
- Witness Signature;
- Damaged Dwelling:
  - Addresses of the damaged dwelling and the applicant's current location (if other than the damaged dwelling);
  - County;
  - Geospatial location of dwelling; and
  - Information related to residence (type, own/rent, damage sustained).



- Disaster-Related Expenses;
- Emergency Needs (Food, Clothing, Shelter);
- Special Needs (Mobility, Mental, Hearing, Vision, Other Care);
- Occupant and Household Information (for all occupants at the time of disaster):
  - Name (First Name, Middle Initial, Last Name);
  - Age;
  - Relationship to Applicant;
  - Dependent? (Yes/No);
  - Sex; and
  - Pre and Post-Disaster Income Information Of Those Occupants 18 Years of Age or Older.
- Business Damage:
  - Self-Employment is Primary Income? (Yes/No); and
  - Business or Rental Property Affected? (Yes/No).
- Authorization for Electronic Funds Transfer of Benefits:
  - Institution Name;
  - Account Type;
  - Account Number and Routing Number; and
  - Average Balance.
- Comments and Correspondence from the Applicant;
- Supporting documents to show proof of occupancy or ownership and verify identity;
- Public Records Information for Identity Verification;
- Pre-registration Questionnaire Information;
- Disaster Loan Status (Rejected, Approved, Declined, Verified, Cancelled);
- Travel and accommodations-related information (e.g., flight information, travel assistance needs, companion information);
- Information related to determining eligibility for assistance: date of the disaster, application status, insurance information, types and amount of damage to the dwelling,





results of the home inspection (including inspector's notes and determination);

- Landowner's Information (in cases in which FEMA is placing a manufactured housing unit on the landowner's land);
  - Name;
  - Address;
  - Phone number; and
  - Signature.
- Correspondence and documentation related to determining eligibility and appropriate housing unit size, type, and location for temporary housing assistance including: general correspondence; complaints, recoupment, appeals, oral hearings, and resolutions; requests for disbursement of payments; inquiries from tenants and landlords; information related to household access and functional needs; general administrative and fiscal information; payment schedules and forms; termination notices; information shared with the temporary housing program staff from other agencies to prevent the duplication of benefits; leases; contracts; specifications for repair of disaster damaged residences; reasons for revocation or denial of aid; sales information related to occupant purchase of housing units; and the status or disposition of housing applications.

DAIP information supplied by partner agencies:

- Change of Address Status Code (from SSA);
- Disaster Loan Event Status Code (Rejected, Approved, Declined, Verified, Cancelled) (from SBA);
- Pre-registration Questionnaire Information (from the U.S. Department of Labor);<sup>61</sup>
- Pre-registration Questionnaire Session ID (from the U.S. Department of Labor);
- Food for Florida Pre-registration ID and Application Status (from the State of Florida); and
- HUD Household Data (from HUD).<sup>62</sup>

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<sup>61</sup> The questionnaire is located on the website [www.disasterassistance.gov](http://www.disasterassistance.gov), which is hosted by the U.S. Department of Labor (DOL), but all of the information collected from applicants is not shared with DOL; rather, all applicant PII is entered directly into the DAIP IT system.

<sup>62</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.



Information provided by third parties:

- “Pass/Fail” flag (for identify verification provided by third-party identity verification service);
- Public records information for IdP; and
- Contracted database that is used to validate and standardize the applicant’s address.<sup>63</sup>

Information generated by IA during processing and returned to the DAIP IT system:

- FEMA Disaster Number (generated by FEMA, provided to survivors via NPSCs, Disaster Recovery Centers, etc.);
- Application Status (“In-Process,” “Submitted,” “Approved,” or “Denied”);
- Housing Inspection Required (Y/N);
- Priority of Assistance;
- Type of Assistance being considered; and
- Time Stamps.

Information collected in order to generate a [www.disasterassistance.gov](http://www.disasterassistance.gov) account:

- User ID;
- Password; and
- Personal identification number (PIN).

Information collected by FEIMS<sup>64</sup> to grant all personnel access to ACE, NEMIS-IA, VSR, and DAIP:

- User ID; and
- Password.

## 2.2 What are the sources of the information and how is the information collected for the project?

FEMA directly collects information from the subject individual when they apply for disaster assistance. As defined in 1.5, FEMA uses a number of electronic and hardcopy forms to

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<sup>63</sup> FEMA uses a contractor to provide standardized addresses to verify that the address the applicant entered matches standardized formatting and to ensure accuracy.

<sup>64</sup> FEIMS is FEMA’s account provisioning tool for those IT systems that do not support Personal Identity Verification card authentication.



collect survivor PII. These forms are contained in Appendix B, and collect only those data fields defined in 2.1.

For identity verification purposes, FEMA has contracted with an IdP authentication service to ensure that IA applicants are who they say they are. The IdP authentication service generates questions by using information collected by a third-party company from available public information.

FEMA may receive applicant data from SBA or HUD, in the event that a survivor applies with either agency first. The data elements that FEMA receives are defined in the HUD-DHS/FEMA CMA<sup>65</sup> and the SBA-DHS/FEMA CMA.<sup>66</sup>

### **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

When a survivor initiates a request for disaster assistance, FEMA requests the survivor's name, address, SSN, and date of birth. This data is sent to a third-party IdP service to verify that a person with these attributes exists and that the SSN is valid. The IdP service produces questions created from information taken from publicly-available and commercial sources, and an individual must correctly answer the IdP questions in order to authenticate his or her identity and continue the application process. In cases in which the applicant registers online, via the FEMA mobile website or by telephone the IdP service will return a "pass/fail" flag notifying the applicant of his or her status in a matter of seconds. Applicants registering via the paper form will only be notified of a "fail" flag by FEMA staff. FEMA guarantees the accuracy of the data coming from the IdP through the security and accuracy requirements of the contract between FEMA and the IdP.

Should a survivor wish to create an online account for the purpose of checking the status of or performing limited updates to his or her registration, the same information taken from publicly-available and commercial sources is also used by the third-party IdP service to generate four questions that are used to authenticate the survivor. The IdP service receives the survivor's response to the identity verification questions and the survivor's SSN for identity authentication. The IdP service returns a "pass" or "fail" status to FEMA. FEMA does not see the questions or the answers and merely receives a "pass/fail" indication from the IdP service.

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<sup>65</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.

<sup>66</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.



## 2.4 Discuss how accuracy of the data is ensured.

Since survivors personally complete the online and hardcopy registrations, the information is presumed to be accurate. Survivors who opt to use the telephone registration process provide their information to the NPSC representative, who enters the data into the system. Regardless of the manner of registration, all applicants must pass the IdP in order to verify their identity.

Survivors receive a hard-copy printout of their registration via a mail-out package and therefore are aware of their own registration information and informed that they can correct errors and update information either through the online portal at [www.disasterassistance.gov](http://www.disasterassistance.gov) or by calling the NPSC. The mail-out packages include guidance on the appeals process, as well as a redress notice. Because survivors themselves are the source of the information, it is assumed that the survivor will verify the accuracy of information entered. The integrity of the data is maintained by the IT security controls on the individual IT systems, as well as auditing procedures, as required by DHS policy.

In order to monitor their application status or update their information, survivors may establish a User ID, password, and personal identification number (PIN) in order to create an online account at [www.disasterassistance.gov](http://www.disasterassistance.gov) and gain limited access to their own data. Only survivors that wish to gain access will need to create an account. Otherwise, no account is required in order to receive assistance.

Additionally, according to the contract between FEMA and the IdP, the IdP provider is required to guarantee accuracy of the data sent to FEMA.

The information FEMA receives from HUD and SBA undergoes verification against the SSN, and FEMA verifies that the PII provided by HUD or SBA matches what the applicant provides. Further, data accuracy is guaranteed through the CMAs between DHS/FEMA and HUD<sup>67</sup> and DHS/FEMA and SBA.<sup>68</sup>

## 2.5 Privacy Impact Analysis: Related to Characterization of the Information

**Privacy Risk:** The IA program could maintain inaccurate information about disaster assistance applicants, particularly when the data is collected from other federal agencies in the event that the applicant applies with HUD or SBA first.

**Mitigation:** FEMA mitigates this privacy risk by verifying any applicant data received from other federal agencies against the applicant's SSN, and if inaccuracies are found in the

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<sup>67</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.

<sup>68</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.



received data, FEMA supplies the correct data from the applicant's FEMA file, which will automatically update HUD and SBA's files via the CMAs.

**Privacy Risk:** A survivor may inadvertently provide inaccurate information.

**Mitigation:** When a survivor contacts FEMA, FEMA verifies the applicant's PII by asking for the applicant's name, address, Registration ID (or SSN, if they do not know his or her Registration ID), and last four of the SSN (in the event that the survivor supplied his or her Registration ID). FEMA also sends each applicant a hard-copy printout of his or her application. This procedure provides the applicants with a means to check for any application errors. Additionally, FEMA offers applicants multiple methods of correcting any discrepancy in their data to assure that the IA program will properly process their applications. Survivors may edit their data via [www.disasterassistance.gov](http://www.disasterassistance.gov), via FEMA's mobile website at <http://m.fema.gov/>, or by contacting a NPSC representative via FEMA's toll-free Disaster Assistance Helpline.

**Privacy Risk:** The identity verification "pass/fail" flag could inaccurately fail or pass an individual.

**Mitigation:** To mitigate the risk of an erroneous failure, FEMA has set up a manual review process for applicants who received a "fail" flag. In order to mitigate the risk of an inaccurate "pass," DHS/FEMA has contracted with a third-party IdP service that is contractually required to guarantee data accuracy, and FEMA verifies the information with the applicant in the event of a "fail" flag. FEMA also conducts routine data accuracy reviews from this service by sampling passed applications for data accuracy.

## Section 3.0 Uses of the Information

### 3.1 Describe how and why the project uses the information.

FEMA uses the survivor-provided information to determine eligibility for assistance, and if eligible, to provide assistance to disaster survivors. FEMA also uses the information collected for inspection management, which verifies survivor damage claims and assesses the repair or replacement costs. Survivors are required to submit supporting documents such as a driver's license or a government-issued picture ID, property title, tax bill, or utility bill for proof of occupancy. FEMA also uses subsets of applicants' PII for administrative purposes including: budgeting, sheltering, prioritizing assistance, and administering the appeals process.



FEMA also shares survivor PII with participating partner agencies, SBA<sup>69</sup> and HUD,<sup>70</sup> which then use the information to contact survivors about additional assistance that may be available through a participating partner agency when the survivor does not choose to register for such assistance electronically.

FEMA uses the applicant/co-applicant's SSNs both as proof that the individuals are who they are representing themselves to be, as well as to ensure that the SSNs that were used as part of the application package only receive benefits once, and do not receive additional, duplicate benefits from FEMA or other sources. Applicants' SSNs are also used to verify their identities through the IdP service.

### **3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.**

No.

### **3.3 Are there other components with assigned roles and responsibilities within the system?**

When FEMA uses support personnel from the IRS, the IRS personnel serve as NPSC agents who can process survivor applications and answer applicant's questions.

### **3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** FEMA's use of a third-party IdP service and commercial data provider to provide identity authentication poses a risk that a survivor will be denied the benefit of creating an account because of inaccurate information.

**Mitigation:** FEMA mitigates this risk in several ways. To mitigate the risk of inaccurate information DHS/FEMA has agreements in place with the third-party IdP service that require a certain level of accuracy. The IdP service verifies an individual's identity by validating the applicant's responses to verification questions against the IdP's database of amalgamated public records data to ensure that the applicant is the person that is applying for FEMA benefits. FEMA also conducts routine data accuracy reviews from this service by sampling passed applications for data accuracy.

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<sup>69</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.

<sup>70</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.



**Privacy Risk:** The third-party IdP service could use the information for purposes other than those specifically stated by FEMA.

**Mitigation:** FEMA mitigates this risk by putting in place a contractual arrangement stating that the IdP may not use the information for any purpose other than providing FEMA the data it is contractually obligated to provide. Violation of these terms will result in a cause of action against the IdP.

**Privacy Risk:** Personnel could use the information in the IA program for purposes other than those for which it was originally collected.

**Mitigation:** FEMA mitigates this privacy risk in several ways. First, FEMA is bound by the Routine Uses defined in the DRA SORN.<sup>71</sup> Second, FEMA limits its data collection from IA applicants to only data that is required to process disaster assistance applications. Third, IA datasets are minimized to reduce the amount of PII that transverses FEMA IT systems and to ensure that only those FEMA programs and personnel with a need to know are able to access this PII. Fourth, FEMA also limits IT system access to authorized users. Access is based on an individual's roles and responsibilities, and all users are required to sign a Rules of Behavior Agreement in order to access any FEMA systems. Any individual, including IRS agents, discovered to have inappropriately accessed any of the IA IT systems will face disciplinary action up to and including loss of security clearance and/or termination of employment. Last, the Information System Security Officer (ISSO) for IA performs periodic system access reviews.

## Section 4.0 Notice

### **4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

Notice is provided by way of the DRA SORN.<sup>72</sup> In addition, a Privacy Notice<sup>73</sup> is provided in hardcopy, electronic form, or verbally by NPSC staff to survivors requesting assistance. The notice explains why FEMA collects the survivor's PII, what it is used for, with what agencies or entities the data is shared, the consequences of failure to submit the PII, and the legal authorities for collecting and sharing survivor PII.

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<sup>71</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

<sup>72</sup> *Id.*

<sup>73</sup> See Appendix B: OMB 1660-002: FEMA Form 009-0-1.



## 4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

During the registration process, prior to entering any PII, FEMA informs the survivor, through the Privacy Notice, that failure to submit the necessary PII may result in the denial of disaster assistance. A survivor can also exit the registration process at any time prior to submitting the application, and his or her PII will be deleted.

## 4.3 Privacy Impact Analysis: Related to Notice

**Privacy Risk:** Survivors may be unaware of the collection and uses of their PII.

**Mitigation:** This risk is mitigated because notice is provided to survivors through the Privacy Notices on all the forms that survivors complete, including the online forms, as well as verbally by the NPSC representative during a phone interview, and by the DRA SORN.<sup>74</sup>

**Privacy Risk:** The individuals applying for FEMA's IA programs might not receive a Privacy Notice informing them about what PII is collected and how it is used at the time their information is collected.

**Mitigation:** This risk is mitigated because FEMA provides notice of its information collection to facilitate the provision of its IA programs in several ways. Methods include Privacy Notices on paper forms, web and mobile sites, and a verbal privacy notice provided by FEMA's NPSC staff who provide telephone assistance to applicants. Lastly, this document and the DRA SORN<sup>75</sup> provide notice of FEMA's collection of information for IA programs.

## Section 5.0 Data Retention by the project

### 5.1 Explain how long and for what reason the information is retained.

IA data is retained according to the records schedules defined in 1.4, depending upon the type of record and the schedule which it belongs to.

- Under GRS-5.4, Item 080, Housing Rental and Lease Records are temporary and should be destroyed three years after lease termination, lapse, reassignment, rejection of application, cancellation of lease, or conclusion of litigation, as applicable.
- Under GRS-5.5, Item 020, mail, printing, and telecommunication control records are temporary and should be destroyed when one year old or when superseded or obsolete, whichever is applicable, but longer retention is authorized, if required for business use.

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<sup>74</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

<sup>75</sup> *Id.*





- DAA-0563-2012-0002-0007 provides that all mission activities photographs that provide adequate and proper documentation of mission activities are permanent. They must be cut off at the end of the calendar year in which they were created. FEMA must transfer to NARA in 3 year blocks at the end of the last year of the block, along with any related documentation and external finding aids in hard copy or electronic form.
- Under N1-311-86-001, Item 4C6b, any correspondence with insurance carriers that hold policies on disaster survivors' residences are temporary. These files must be consolidated at the appropriate regional office upon termination of the disaster (when all families have been relocated to permanent housing; the audit, if one is made, has been accepted by both FEMA and the state; and all monies due have been received). These records should be retired to a Federal Records Center (FRC) 1 year after termination, and they should be destroyed 3 years after termination.
- Under N1-311-86-001, Item 4C6c, correspondence files associated with the duplication of benefits are temporary. These files should be consolidated at the appropriate regional office upon closeout of Disaster Field Operations. They should be retired to an FRC 1 year after closeout, and destroyed 3 years after closeout.
- Under N1-311-86-001, Item 4C10a, all IA program files, except those relating to temporary housing and Individual and Family Grant programs, which include other programs such as Disaster Unemployment Assistance, Crisis Counseling and Training, Legal Services, Superfund, Flood Plain Management, Duplication of Benefits, and the Cora Brown Fund, are temporary. They must be retired to inactive storage when 2 years old, and destroyed when 6 years, 3 months old.
- Under N1-311-86-001, Item 4C10b, Temporary Housing Files, including copies of computer printouts scoreboards, Federal Coordinating Officer's digests, correspondence, and related records are temporary. They must be destroyed when database elements have been established and defined.
- Under N1-311-86-001, Item 4C10c, records relating to mobile home and travel trailer program files, including copies of correspondence and procedures, e.g., acquisitions, technical standards, and guides; specimen contracts and procurement documents; data on mobile home programs at disaster sites; and working papers on manuals, instructions, and other issuances are temporary. These records should be cut off at the end of the calendar year, and destroyed 6 years and 3 months after cutoff.
- Under N1-311-86-001, Item 4C10d, files relating to permanent relocations under the Superfund and purchases of properties under Section 1362, which include headquarters files relating to individual property owners, background data, addresses, value of property, negotiation records, and related records, are permanent. These records should



be cut off at the conclusion of the project, retired to an FRC 3 years after cutoff, and then transferred to the National Archives in 5-year blocks 20 years after cutoff.

- N1-311-00-001, Item 1 provides that customer services satisfaction surveys that have been filled out and returned by disaster applicants are temporary. They should be destroyed upon the transmission of the final report.
- N1-311-00-001, Item 2 requires that statistical and analytical reports that are based on survey responses and document trends and recommend programmatic changes to disaster assistance are temporary. They should be cut off at the close of the report, retired to an FRC 3 years after cutoff, and destroyed 20 years after cutoff.
- N1-311-00-001, Item 3 requires that a composite of survey results per disaster are maintained in an agency-standard database. These records are temporary and should be destroyed when no longer needed for analytical purposes.
- N1-311-86-001, Item 4B6b requires that documents created in developing protection criteria for shelters in private homes, including drawings, specifications, home protection surveys, and other records on required protection for individual families in their homes are temporary. They should be cut off at completion of the contract and destroyed 3 years after cutoff.
- Per N1-311-04-5, Item 1, records pertaining to September 11, 2001, and Hurricane Katrina and all records categories associated with these events are permanent, per the FEMA records disposition manual. This disposition instruction is applicable to records, both paper and electronic, regardless of format or media. These records are permanent, and they should be cut off when all activity has ceased for the particular operations after. They should be transferred to an FRC 1 year after cutoff and transferred to the National Archives 20 years after cutoff.
- Per N1-311-04-5, Item 2, all records relating to Hurricane Katrina and September 11, 2001, which have temporary dispositions in the FEMA records disposition manual are temporary. Cutoff occurs when all activity has ceased for the particular operations area. They should be transferred to an FRC 1 year after cutoff and destroyed 75 years after cutoff.
- Per N1-311-04-5, all unscheduled records categories associated with Hurricane Katrina and September 11, 2001, remain unscheduled. These records should be cut off when all activity has ceased for the particular operations area. Programs in possession of these records should contact their local Records Liaison Officer or the Headquarters Information Management Division, Records Management branch to in order to develop a disposition schedule. Records should be transferred to an FRC 1 year after cutoff.



- Per N1-311-04-5, Item 3, all records associated with a domestic catastrophic event, to include September 11, 2001, and Hurricane Katrina are permanent, and should be cut off when all activity has ceased for the particular operations area. The records should be transferred to an FRC 1 year after cutoff, and transferred to the National Archives 20 years after cutoff. This category includes, but is not limited to, records relating to pre-response operations; the Presidential Declaration; Emergency Coordination (EC); Emergency Support (ES); Urban Search and Rescue response (US&R); Public Assistance (PA), including, but not limited to, project applications, original damage survey report, mission assignments, funding documents, project time extensions, applicant appeals, eligibility determinations, and documents on insurance requirement, policies, procedures; Individual Assistance (IA) records including, but not limited to, mission assignments, specific IA policies, and guidance/standard operating procedures(s) and correspondence with state and local officials; and Mitigation. This disposition instruction is applicable to records, both paper and electronic, regardless of format or media.
- N1-311-86-1, Item 4C8b(1), provides that master occupant/applicant files, containing all original occupant-related documents, such as site requests, mobile home sales documents, leases, or contracts, are temporary. These records should be consolidated at the appropriate regional office at the end of Phase II (when all shelterees have been moved to permanent housing), retired to an FRC 1 year after the files are consolidated, and destroyed 6 years 3 months after the files are consolidated.
- Per N1-311-86-1, Item 4C8b(2), provides that working field applicant and occupant files are temporary. They should be reviewed at the end of Phase I operations (when all qualified applicants have received temporary housing) to ensure all occupant-related original documents are in the master occupant/applicant files or Mobile Home Storage Program files, as appropriate. These files should be destroyed when FEMA stops providing services to the occupant.
- Under N1-311-86-1, Item 4C8b(4), control records and logs relating to temporary assistance program files are temporary. These records should be forwarded to the appropriate regional office at the end of Phase II, retired to an FRC 1 year after the end of Phase II, and destroyed 6 years and 3 months after the end of Phase II.

## **5.2 Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** IA will retain the data for a longer period than necessary and not in accordance with the NARA-approved records schedules.

**Mitigation:** This risk is mitigated because FEMA follows all pertinent records schedules discussed in 1.4 and 5.1. In addition, the FEMA Records Branch provides trainings to inform FEMA programs of proper record retention, disposition requirements, records inventory training,



file plan training, and file structure training to ensure that FEMA personnel are aware of the National Archives' requirements.

## Section 6.0 Information Sharing

### **6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.**

FEMA routinely shares PII outside of DHS with federal, state, tribal, local, international, private sector, and voluntary entities, as defined in the DRA SORN,<sup>76</sup> for the purposes of providing disaster assistance, meeting survivor needs, and preventing the duplication of benefits. FEMA's interagency partners are granted limited access to information as it relates to their programs, and applicants are automatically routed to SBA and/or HUD to determine their eligibility for benefits under their programs, depending on their income. In all cases, access to the data is limited and is granted based on a demonstrated need-to-know basis. Formalized CMAs are in place with SBA<sup>77</sup> and HUD<sup>78</sup> to prevent a duplication of benefits. Each CMA requires that FEMA and HUD and FEMA and SBA compare registration data to ensure that applicants are not receiving duplicate benefits. To do so, each agency compares its records to those of its partner by using the SSN and FEMA Registration ID as each applicant's unique identifier. However, when a match is found, an applicant's benefits are not automatically denied or reduced. FEMA personnel (or HUD or SBA) conduct a manual review of the match to ensure that the match is accurate. If and when this occurs, the agency that has awarded benefits may reduce or deny additional benefits.

#### ***Housing and Urban Development***

FEMA and HUD share information in order to prevent applicants from receiving duplicate benefits from either agency, as well as to quickly transition applicants and their families from the temporary relief programs provided by FEMA into longer-term relief programs administered by HUD.<sup>79</sup> HUD uses FEMA data to assess damage and allocate Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the most impacted states and local governments (grantees). Those grantees administer CDBG-DR programs that provide aid to disaster survivors, most often by funding housing rehabilitation. CDBG-DR assistance is meant to address unmet needs that remain after a disaster survivor has received insurance proceeds and any aid from FEMA

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<sup>76</sup> *Id.*

<sup>77</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.

<sup>78</sup> Computer Matching Program between HUD and DHS/FEMA, 81 FR 63195 (September 14, 2016). Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-22006.pdf>.

<sup>79</sup> See <https://www.hud.gov/info/disasterresources>.



or SBA. The CMA between HUD and FEMA enables HUD and CDBG-DR grantees to identify these unmet needs, as well as to prevent recipients from receiving duplicate benefits.

HUD may also use FEMA data to help disaster survivors through its standard programs, such as public housing and housing choice vouchers. Survivors receiving temporary housing assistance from FEMA who also have very low incomes may be eligible for HUD housing assistance. HUD identifies these individuals using FEMA data, and helps them to transition from temporary FEMA assistance to longer-term HUD assistance.

FEMA and HUD perform a computer match<sup>80</sup> on the following data elements:

- FEMA Registration ID;
- FEMA Disaster Number;
- SSN of the head of household;
- First and Last Name and Middle Initial of the head of household;
- Date of birth of head of household; and
- Damaged Address Street Address.

### ***Small Business Administration Loans***

Through ONA, the SBA provides low-interest, long-term loans to assist individuals and households with personal property; transportation; and moving and storage expenses incurred due to a declared disaster. To determine a survivor's eligibility for an SBA loan, the survivor must meet an income threshold. This determination is part of the IA application process, and if a survivor passes the income threshold minimum of \$33,000 per year, FEMA routes his or her application to SBA, where the SBA evaluates the survivor on their suitability to receive a low-interest loan. SBA returns a status once the survivor's loan eligibility has been determined. This information is made available to the survivor via his or her online account, or via telephone, in the event that an individual does not have an online account. SBA uses information provided by FEMA, as part of the CMA,<sup>81</sup> in order to contact those survivors who are eligible for the SBA loan program and did not create an online account at [www.disasterassistance.gov](http://www.disasterassistance.gov). FEMA may provide additional assistance to supplement SBA's assistance once an SBA eligibility determination has been made.

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<sup>80</sup> A computer matching program is a computerized comparison of two or more automated systems of records for the purpose of establishing or verifying eligibility or compliance as it relates to cash or in-kind assistance or payments under federal benefit programs.

<sup>81</sup> Computer Matching Program between SBA and DHS/FEMA, 80 FR 57902 (September 25, 2015). Available at <https://www.gpo.gov/fdsys/pkg/FR-2015-09-25/html/2015-24477.htm>.



Like HUD, FEMA and SBA have entered into a CMA to prevent survivors from receiving duplicate benefits from both agencies.<sup>82</sup>

FEMA and SBA compare records on the following data elements:

- FEMA Registration ID Number;
- SSN;
- Name;
- Address;
- Date of birth;
- Damaged property information;
- Insurance policy data;
- Property occupant data;
- Vehicle registration data; and,
- Flood zone and flood insurance data.

### ***Social Security Administration***

FEMA has partnered with the SSA to enable applicants who are currently receiving Social Security benefits to automatically change their address to ensure continued receipt of benefits. From within their [www.disasterassistance.gov](http://www.disasterassistance.gov) account, an applicant can choose to apply for assistance from other federal agencies. The applicant clicks a link, “Update My Address with the Social Security Administration,” which provides a consent and Privacy Notice screen. The applicant provides consent via a checkbox and clicks “Next.” The next page verifies the applicant’s current address, where they must select a checkbox to confirm their address change, as well as a checkbox to change their phone number. Finally, they select an effective date and click “Next.” The final screen is a confirmation page. The information shared with SSA is as follows: street address, city, state, zip, phone number, and phone type.

### ***Food for Florida under the United States Department of Agriculture***

The IHP may share information provided by disaster survivors with the Food for Florida Program (FFF), which shares survivor data with the Florida Department of Children and Families (FDCF) and the Florida Northwood Shared Resource Center (FNSRC) to prequalify and preregister them for additional assistance. FFF is a federally-funded, state-administered program from the U.S. Department of Agriculture’s Disaster Supplemental Nutrition Assistance Program

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<sup>82</sup> *Id.*



(DSNAP) that provides food to mothers with children in need of food assistance. FEMA has yet to share information with this program. If and when this functionality is turned on, FEMA will share with the DAIP, FFF, FDCF, and the FNSRC:

- FEMA Registration ID;
- Registrant First Name;
- Registrant Last Name;
- Registrant Middle Initial;
- Registrant SSN;
- Registrant Date of Birth;
- Sex indicator for Male or Female of Registrant;
- Applicant Driver's License/ID Number;
- Language;
- Damaged street address;
- City;
- State;
- Zip+4;
- Home damage (Y/N);
- Mailing address;
- Current phone number;
- Alternate phone number; and,
- County code.

### ***Application Status Messaging***

The IHP uses a third-party text message service to provide disaster survivors with registration status change notifications, should they opt-in. The text message notifications to a survivor's mobile device are available for a select number of registration status changes.

SMS status notifications either in English or Spanish are sent from the DAIP to the third-party text message service, which dispatches the notification to a survivor's mobile phone. Status notifications only contain the FEMA Registration ID and are available for a variety of events. The



table below maps the events with the corresponding SMS notifications sent to a survivor’s mobile phone:

Event	SMS Notification
<b>Opt-in Confirmation</b>	“FEMA ID##### To complete your subscription to FEMA’s text messaging service reply YES to accept or STOP to decline.”
<b>Welcome Notification</b>	“FEMA ID ##### You are now set up to get text messages when your application status changes on DisasterAssistance.gov. Reply STOP to end this text message service.”
<b>Eligibility Decision</b>	“FEMA ID ##### Status updated. Log in to DisasterAssistance.gov to check status. Reply STOP to end this text message service.”
<b>Request for Information</b>	“FEMA ID##### More information needed. Log in to DisasterAssistance.gov for details. Reply STOP to end this text message service.”
<b>Inspection</b>	“FEMA ID##### A FEMA Inspector was unable to contact you. Your case is on hold. Call 1-800-621-FEMA (3362). Reply STOP to end this text message service.”
<b>Opt-out Confirmation</b>	“FEMA ID##### You have stopped FEMA’s text messaging service. Continue to check status at DisasterAssistance.gov.”

The SMS capability is expected to reduce the number of calls to FEMA NPSCs and visits to [www.disasterassistance.gov](http://www.disasterassistance.gov) by satisfying the survivor’s desire for timely status change notifications without requiring them to repeatedly call the NPSCs or check the survivor’s application status online. This potential system load reduction would be especially beneficial to FEMA and to disaster survivors in catastrophic events, when a surge of survivors can stress and overload FEMA’s NPSC and web applications’ capacities.

FEMA is working to limit the length of text that survivors can send in reply to the outbound text messages. In the interim, FEMA warns participants not to reply to text messages to minimize the chance that they might send PII.

### ***Third-Party IdP***

The DAIP uses a third-party IdP verification service to verify the identity of FEMA applicants. It also authenticates applicants who choose to create an account on [www.disasterassistance.gov](http://www.disasterassistance.gov) to check the status of their registration. The information shared with the IdP service to enable these ID verification and authentication services includes the registrant’s SSN, as well as the registrant’s responses to four authentication questions.





## **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN(s) noted in 1.2.**

The external information sharing discussed in 6.1 is done under Routine Uses F, H, and I of the DRA SORN.<sup>83</sup> Routine Use F allows FEMA to share with its contractors when necessary for the purpose of providing disaster assistance. This routine use allows FEMA to share information with the text messaging service that is used to supply survivors with registration status change notifications. Routine Use H allows FEMA to share applicant information to prevent a duplication of benefits or to address the unmet needs of eligible, ineligible, or partially eligible FEMA applicants. This sharing is compatible with the original purpose of collection because FEMA conducts these information sharing activities in order to prevent a duplication of benefits and to assist in addressing applicants' unmet needs. Routine Use I allows FEMA to share with federal, state, tribal, or local government agencies; voluntary organizations; insurance companies; employers; any public or private entities; banks and financial institutions when an applicant's eligibility, in whole or in part, for IA benefits depends upon financial benefits already received or available from that source for similar purposes as necessary to determine benefits; and to prevent duplication of disaster assistance benefits. FEMA shares information with these entities to prevent a duplication of benefits, as well as to determine IA eligibility.

Additionally, FEMA memorializes external information sharing through a number of documents, including CMAs, Information Sharing Access Agreements (ISAA), FEMA-State Agreements, and Routine Use letters. In this documentation, FEMA provides the receiving entity with the security requirements to ensure that the data is protected from third-party disclosure, and that survivor PII is protected according to industry-standard security practices.

## **6.3 Does the project place limitations on re-dissemination?**

The contracts, MOUs, ISAAs, FEMA-State Agreements, and CMAs between FEMA and each participating entity cover security requirements for transmission of data, as well as the limitations on re-disseminating the data. Additionally, Service Level Agreements (SLA), and Interconnection Security Agreements (ISA) are in place with HUD, SBA, SSA, and FFF detailing technical requirements for transmission and security of data between FEMA, partner agencies, and FEMA's contractors.

## **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

FEMA routinely shares PII outside of DHS with those entities defined in the DRA SORN<sup>84</sup> for the purposes of providing disaster assistance, meeting survivor needs, and preventing the

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<sup>83</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

<sup>84</sup> *Id.*



duplication of benefits. These disclosures are memorialized through various documents, including CMAs, ISAAs, FEMA-State Agreements, and Routine Use letters, which are maintained by ORR.

When a survivor makes a Freedom of Information Act (FOIA) request or a request under the Privacy Act and records are disclosed, such disclosures are recorded through the Information Management Division/Disclosure Branch's standard practices, consistent with the FOIA/PA SORN.<sup>85</sup>

## 6.5 **Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** Survivor PII could be shared with agencies outside of DHS for purposes other than those outlined in 6.1.

**Mitigation:** This risk is mitigated because IA only shares PII with other entities and agencies pursuant to the sharing agreements described in 6.1. If a user is found through FEMA's auditing processes to have shared PII for other purposes, that user may face disciplinary action up to and including loss of employment or loss of security clearance.

FEMA will review these agreements every three years or as changes are made to the interface and annually review appropriate security documents for any newly identified risks. Any newly identified risks will be mitigated between the partnering agencies in accordance with applicable laws.

**Privacy Risk:** The information in the IA IT systems could be erroneously disclosed.

**Mitigation:** This risk is mitigated because FEMA only shares the information in IA outside of DHS pursuant to the routine uses found in the DRA SORN,<sup>86</sup> and only pursuant to information agreements signed by FEMA and the external entity, or in response to a written request submitted to the FEMA Disclosure Office.

**Privacy Risk:** Survivors could accidentally send PII if they reply to a FEMA text message.

**Mitigation:** This risk is partially mitigated. FEMA's outgoing text messages warn recipients not to respond to text messages to minimize the risk that an applicant might inadvertently disclose PII.

**Privacy Risk:** Survivors could accidentally provide an inaccurate mobile phone number, and FEMA text messages could be sent to the wrong mobile phone, potentially giving a third party access to the survivor's application information.

**Mitigation:** This risk is mitigated because the information sent by FEMA in text messages only comprises the type of update that has been made to the account and the FEMA Registration

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<sup>85</sup> DHS/ALL-001 Department of Homeland Security (DHS) Freedom of Information Act (FOIA) and Privacy Act (PA) Record System, 79 FR 6609 (February 4, 2014).

<sup>86</sup> *Id.*



ID. An individual who receives a text from FEMA cannot access an applicant's PII without either verifying the applicant's identity to an NPSC representative<sup>87</sup> or logging into his or her [www.disasterassistance.gov](http://www.disasterassistance.gov) account. In addition, because applicants provide their own mobile phone number, that number is presumed to be correct. Applicants can review their information, including text messaging opt-in, by accessing their online account via [www.disasterassistance.gov](http://www.disasterassistance.gov).

## Section 7.0 Redress

### 7.1 What are the procedures that allow individuals to access their information?

Survivors can access their information in several ways: (1) if a survivor created an online account at [www.disasterassistance.gov](http://www.disasterassistance.gov), the survivor may access his or her information by logging into the account using the User ID, password, and PIN that the survivor established when he or she created the account; (2) survivors may call the published disaster assistance toll-free number to check on the status of their application or access their records after providing their registration ID; (3) survivors receive a hard copy of their completed FEMA Form 009-0-1 as part of the mail-out package to the survivor after registration, which includes a notice of redress; (4) survivors may visit a DRC to discuss or review their case files; (5) survivors may request their applicant file; (6) non-citizen survivors can request their records by going to the DHS FOIA website<sup>88</sup> and completing the online form; (7) survivors who are U.S. citizens or lawful permanent residents may submit a Privacy Act request pursuant to DHS's Privacy Act Regulations;<sup>89</sup> and (8) in rare cases, housing inspectors may collect and enter applicant information into the Automated Construction Estimator (ACE)<sup>90</sup> in order to modify/correct their information within the NEMIS-IA system.

Requests for Privacy Act-protected information must be made in writing, and clearly marked as a "Privacy Act Request." The name of the requester, the nature of the records sought, and the required verification of identity must be clearly indicated. Requests should be sent to:

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<sup>87</sup> Applicants initially verify their identity with NPSC personnel by providing either their full SSN or Registration ID. NPSC personnel will query NEMIS-IA by either the SSN or the Registration ID, and will then ask the survivor to provide the last 4 of the SSN (in cases in which the applicant provided the Registration ID), first and last name, and the damaged address. Should a survivor provide any of this information inaccurately, NPSC personnel will tell the applicant that the call cannot proceed, as he or she has failed to verify his or her identity. Per policy, NPSC personnel are forbidden from revealing any application information to an unauthenticated caller.

<sup>88</sup> See <https://www.dhs.gov/freedom-information-act-foia>.

<sup>89</sup> 44 CFR § 6 and 6 CFR § 5.

<sup>90</sup> See Appendix A, p. 70.



FEMA Information Management Division  
Chief, Disclosure Branch  
500 C Street, S.W., Mailstop 3172  
Washington, D.C. 20472

## **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

Survivors may correct certain data that they entered inaccurately via [www.disasterassistance.gov](http://www.disasterassistance.gov) by logging into their account and making the appropriate corrections. If online access is not available, or if the survivor prefers, he or she can contact the NPSC and correct information (after verifying his or her identity). In addition, survivors could notify FEMA in writing of the error or inaccuracy and provide FEMA with the correct information.<sup>91</sup> Survivors may send requests for their applicant file to the Disclosure Officer at:

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Chief, Disclosure Branch  
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Washington, D.C. 20472

However, survivors may also request a copy of their file by contacting the NPSC, which is generally a more expedient way of correcting information. For data that needs to be corrected from an external agency, a request can be made to that agency in accordance with their applicable policies.

If a survivor fails the IdP checks for identity when applying for assistance, he or she can still complete a registration through an NPSC representative. However, the survivor still has to submit proof of his or her identity in order to actually receive disaster assistance. When a survivor who has not passed identity verification submits an application, the survivor receives an ineligible decision notification telling them that FEMA was unable to verify his or her identity, as well as what documentation the survivor can provide in order to overturn the verification failure. FEMA does not provide the information from the IdP service to the survivor, as FEMA does not have details as to why the survivor failed the check. All applications that fail the identity verification process are manually reviewed by FEMA personnel.

If the survivor fails the IdP identity authentication when attempting to check the status of his or her application via their online account, the survivor is instructed to either return to the website and attempt again or contact the NPSC, where a representative retrieves the survivor's registration form and again asks a series of questions from the details of the registration to ensure

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<sup>91</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), p. 27, available at [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).



the survivor submitted the registration. If the survivor correctly answers the questions, the NPSC is permitted to discuss the status of the survivor's registration, and the survivor will be allowed to change his or her current mailing address. Survivors needing to change their SSN or bank account information are required to mail in proof of a change before this information will be changed.

### **7.3 How does the project notify individuals about the procedures for correcting their information?**

Survivors are notified of the procedures for correcting information prior to the collection of information through the DRA SORN,<sup>92</sup> the Individuals and Household Program Unified Guidance,<sup>93</sup> the [www.disasterassistance.gov](http://www.disasterassistance.gov) portal, and this PIA. Moreover, redress is provided to survivors requesting assistance through the appeals process. In addition, after registration through the DAIP system, each applicant receives a mail-out package, which includes an application guide with directions for redress in a section entitled, "I Want to Have My Case Reviewed Again (Appeal)."

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** IA disaster applicants may be unaware of the redress procedures or how to correct their information.

**Mitigation:** This risk is mitigated because FEMA provides several means of redress and notice of procedures to applicants who wish to amend their disaster assistance registration information. FEMA provides applicants with a direct notice of redress in the mail-out packages sent to each applicant, as noted in Section 7.1 above. FEMA also provides redress through NPSC representatives, whom applicants may contact toll-free via telephone. For example, NPSC representatives may assist applicants in correcting their information, as well as assist them in further processing their application. In addition, as noted in Section 7.2 above, FEMA manually reviews applications that return a "fail" flag from its third-party IdP service and informs applicants of how they can provide additional information to verify identity. This mitigates the impact upon the applicant should FEMA receive erroneous information from its third-party IdP service. Lastly, the DRA SORN<sup>94</sup> and this document provide notice of redress processes to disaster assistance applicants.

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<sup>92</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

<sup>93</sup> See Individuals and Households Program Unified Guidance, FP 104-009-03 (September 2016), available at [https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG\\_CoverEdit\\_December2016.pdf](https://www.fema.gov/media-library-data/1483567080828-1201b6eebf9fbbd7c8a070fddb308971/FEMAIHPUG_CoverEdit_December2016.pdf).

<sup>94</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



## Section 8.0 Auditing and Accountability

### **8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?**

IT contractors handling the operations and maintenance of the system have limited access to the system to support the troubleshooting of technical system issues encountered on a day-to-day basis. FEIMS implements the security access controls and administers users' roles and permissions based on organizational positions, which are assigned and approved by the employees' supervisors.

All IA IT systems log all user activities and can be monitored or audited at any time. Users are warned that their activities are monitored and that they have no expectation of privacy. FEMA IT security teams routinely conduct audits to ensure that there is no misuse of IA data and that users are acting in accordance with FEMA's rules of behavior. FEMA also encrypts all applicant data while in transit and at rest.

### **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

All FEMA employees and contractors are required to complete FEMA Office of Cybersecurity Security Awareness Training and Privacy Awareness Training on an annual basis. FEMA requires that all contracts contain cyber hygiene and privacy clauses, which require that contract employees adhere to the requirements of the Privacy Act and other federal guidelines that mandate privacy controls. Supplementary security and privacy training is provided for those with additional security-related responsibilities, as well as the intake and leadership personnel in the NPSCs.

### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

All IA IT systems use role-based access controls to control user rights to both data and functionality. Permissions for access to the data and functions used to manipulate the data are defined for each FEMA position. Access permissions are based on the principles of separation of duties and "need to know."

In order to get an initial account in any of the IA IT systems, FEMA employees and contractors requiring access to an IA IT system must send a request to the approving official within FEMA Office of Response and Recovery (ORR). State government users who have



access to the NEMIS-IA State Web module<sup>95</sup> must follow a similar process as FEMA employees and contractors. IT contractors handling the operations and maintenance of the system also have limited access to the system to support the troubleshooting of technical system issues encountered on a day-to-day basis. FEIMS implements the security access controls and administers users' roles and permissions based on organizational positions, which are assigned and approved by the employees' supervisors.

#### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

All external information sharing is memorialized via CMAs, ISAAs, ISAs, FEMA-State Agreements, or Routine Use letters. CMAs are reviewed by FEMA's Office of Chief Counsel, FEMA's Information Management Division (including the Privacy Branch), the Deputy Administrator of FEMA, and the DHS Data Integrity Board.<sup>96</sup> All other contractually-based information sharing endeavors outside of FEMA are reviewed by the Office of Chief Counsel (by each party to the agreement), the Office of the Chief Information Officer, and the FEMA Privacy Branch for consistency with the DRA SORN.<sup>97</sup>

#### **8.5 Privacy Impact Analysis: Related to the Accountability and Integrity of the Information.**

**Privacy Risk:** A privacy risk exists that the volume and sensitivity of the data makes it a target of potentially malicious actors.

**Mitigation:** This risk has been mitigated by the implementation of encryption and auditing protections of survivor information. FEMA uses industry-standard cybersecurity practices, including encryption of survivor data while in transit and at rest. Additionally, FEMA restricts access to survivor data to only those individuals with a demonstrated need to know in order to perform their official FEMA job functions.

Additionally, FEMA NPSC staff are required to work exclusively within the IT systems, and they are not permitted to take handwritten notes. FEMA managers monitor NPSC staff, as well as provide assistance to applicants. In addition, FEMA records applicant telephone calls as a means of quality assurance and to improve customer service.<sup>98</sup>

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<sup>95</sup> The NEMIS-IA State Web module is used by states that elect to administer ONA jointly with FEMA, rather than allow FEMA to administer these programs.

<sup>96</sup> CMAs are reviewed at least annually. For more information about the DHS Data Integrity Board, *see* [https://www.dhs.gov/sites/default/files/publications/computer-match-directive-262-01\\_0.pdf](https://www.dhs.gov/sites/default/files/publications/computer-match-directive-262-01_0.pdf).

<sup>97</sup> DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

<sup>98</sup> DHS/EFMA-002 Quality Assurance Recording System of Records, 82 FR 32564 (July 17, 2017).



**Privacy Risk:** FEMA may deny benefits to a survivor based on inaccurate information.

**Mitigation:** This risk is mitigated because FEMA offers applicants multiple methods of correcting any discrepancy in their data to assure that FEMA will properly process their applications. Survivors may edit their data via [www.disasterassistance.gov](http://www.disasterassistance.gov), FEMA's mobile website at <http://m.fema.gov/>, or by contacting a NPSC representative via FEMA's toll-free Disaster Assistance Helpline.

## Responsible Officials

William H. Holzerland  
Senior Director for Information Management  
Federal Emergency Management Agency  
Department of Homeland Security

## Approval Signature

Original, signed copy on file with the DHS Privacy Office.

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Philip S. Kaplan  
Chief Privacy Officer  
Department of Homeland Security





## Appendix A: IA IT Systems



## National Emergency Management Information System Individual Assistance (NEMIS-IA)

### Program/System:

The Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Recovery Technology Programs Directorate (RTPD), IA.

### Purpose and Use:

The purpose of NEMIS-IA system is to support disaster relief to individuals or households whose property has been damaged or destroyed and whose losses are not covered by insurance. This can include real and personal property assistance, temporary housing assistance, and other financial assistances. In conjunction with state partners, it may provide assistance for disaster-related necessary expenses for uninsured or underinsured individuals.

NEMIS-IA contains a number of major web-based modules that assist in processing case files, supplying letter content, manually processing applications, and managing inspections (including inspection assignment and inspection review), direct housing, and applicant correspondence through mail, email, helpline, and voice response. The primary applications are the Applicant Services Technical Center (ASTC), Inspection Management (IM), the Admin Tool, the Mail Utility Module (MUM), the Housing Operations Management Enterprise System (HOMES), and the State Web Module.

- The **Applicant Services Technical Center (ASTC)** allows case workers, NPSC users, helpline agents, and field staff look up and make changes to a survivor's information. This module also provides the mechanism for all manual, appeals, and recertification case processing.
- The **Inspection Management (IM)** module supports the Housing Inspection Services (HIS) teams in managing inspection activity for a given disaster. This module provides a mechanism to assign inspections to an inspector, review returned inspections, issue correction inspections, and perform quality control reviews on selected inspectors.
- The **Admin Tool** is the module that allows IA to set up and manage each disaster in NEMIS-IA with a system of configurable toggles. This module also houses a number of other disaster-related capabilities such as specifying which line item pricing to use, updating fair market rate data (used to determine benefit amounts), as well as other disaster-specific setup requirements. This module does not manage any PII.
- The **Mailroom Utility Module (MUM)** is the tool that prints mailing labels and correspondence that has to be sent to survivors. It enables FEMA to administer, monitor, and manage work orders processed in FEMA's mailing operations at vendor facilities.



- The **Housing Operations Management Enterprise System (HOMES)** is a module that is used for managing direct housing assistance. HOMES pulls in configurable survivor PII in order to place survivors in temporary housing. This application provides a mechanism for managing the Pre-Placement Interview (PPI) process as well as all additional interaction for a survivor and a manufactured housing unit (MHU).
- The **State Web Module** is used by the states to process individual survivors' ONA payment information in situations in which the state elects to provide ONA, instead of FEMA. The State Web Module allows state caseworkers to manually review and resolve ONA cases that cannot be processed automatically.

### **System Access:**

NEMIS-IA applications and services are internal to FEMA and only accessible to approved FEMA employees, contractors, and approved state users via the intranet or the FEMA Secure Sockets Layer (SSL) Virtual Private Network (VPN) Portal.<sup>99</sup>

### **Individuals Impacted:**

Disaster assistance applicants

FEMA NPSC Agents and Caseworkers

IT system administrators

State users

### **Sources of Information:**

The NEMIS-IA system initially receives all PII from the DAIP IT system. NEMIS-IA also receives data from the Automated Construction Estimator (ACE), including the housing inspector's report, which may at times contain updates to a survivor's PII.

### **Data Elements:**

This information is recorded on an electronic version of FEMA 009-0-1 (OMB 1660-0002) and is used among FEMA, federal, state, and local disaster agencies. The data NEMIS-IA stores includes:

#### **Registration and Assistance Records:**

- Disaster Number;
- FEMA Registration ID;

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<sup>99</sup> An SSL VPN is a means of allowing external users to securely access FEMA's network. This technology works through the web browser and all data flows as if it is on the internal FEMA network.



- Applicant/Co-Applicant Information:
  - Full Name;
  - Social Security number or alien registration number;
  - Signature;
  - Date of Birth;
  - Phone numbers;
  - Email addresses;
  - Position Title and Number of Years;
  - Employer Name;
  - Language(s) spoken;
  - Number of Dependents Claimed;
  - User ID;
  - Password; and
  - Personal Identification Number (PIN).
- Witness Signature;
- Damaged Dwelling:
  - Addresses of the damaged dwelling and the applicant's current location (if other than the damaged dwelling);
  - County;
  - Geospatial location of dwelling, and
  - Information related to residence (type, own/rent, damage sustained).
- Disaster-Related Expenses;
- Emergency Needs (Food, Clothing, Shelter);
- Special Needs (Mobility, Mental, Hearing, Vision, Other Care);
- Occupant and Household Information (for all occupants at the time of disaster):
  - Name (First Name, Middle Initial, Last Name);
  - Age;
  - Relationship to Applicant;



- Dependent? (Yes/No);
  - Sex; and
  - Pre and Post-Disaster Income Information Of Those Occupants 18 Years of Age or Older.
- Business Damage:
  - Self-Employment is Primary Income? (Yes/No); and
  - Business or Rental Property Affected? (Yes/No);
- Authorization for Electronic Funds Transfer of Benefits:
  - Institution Name;
  - Account Type;
  - Account Number and Routing Number; and
  - Average Balance.
- Comments and Correspondence from the Applicant;
- Supporting documents to show proof of occupancy or ownership and verify identity, such as:
  - Driver's license or a government-issued picture ID;
  - Property title;
  - Tax bill; or
  - Utility bill.
- Public Records Information for Identity Verification;
- Pre-registration Questionnaire Information;
- Disaster Loan Status (Rejected, Approved, Declined, Verified, Cancelled);
- Travel and accommodations related information (e.g. flight information, travel assistance needs, companion information);
- Information related to determining eligibility for assistance: date of the disaster, application status, insurance information, types and amount of damage to the dwelling, results of the home inspection (including inspector's notes and determination);
- Landowner's Information (in cases in which FEMA is placing a manufactured housing unit on the landowner's land);



- Name;
  - Address;
  - Phone number; and
  - Signature.
- Correspondence and documentation related to determining eligibility and appropriate housing unit size, type, and location for temporary housing assistance including: general correspondence; complaints, recoupment, appeals, oral hearings, and resolutions; requests for disbursement of payments; inquiries from tenants and landlords; information related to household access and functional needs; general administrative and fiscal information; payment schedules and forms; termination notices; information shared with the temporary housing program staff from other agencies to prevent the duplication of benefits; leases; contracts; specifications for repair of disaster damaged residences; reasons for revocation or denial of aid; sales information related to occupant purchase of housing units; and the status or disposition of housing applications.
  - Authorization for Social Security change of address.

#### Supplementary Case Data:

- Authorization for Social Security Change of Address;
- Waiver of Debt Letter of Appeal;
- Receipts;
- Notices of debt;
- Invoices;
- Record of payments, including refunds and overpayment;
- Number and amount of unpaid or overdue bills;
- Record of satisfaction of debt or referral for further action; and
- Correspondence and documentation with debtors and creditors.

#### SORN Coverage:

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



## **Disaster Assistance Improvement Program (DAIP)**

### **Program/System:**

U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Recovery Technology Programs Division (RTPD), Disaster Data Technologies (DDT), Disaster Assistance Improvement Program PMO, Disaster Assistance Improvement Program (DAIP).

### **Purpose and Use:**

The Disaster Assistance Improvement Program (DAIP) application collects disaster survivor application and registration information through various media including: (1) Individual Assistance paper forms (See Appendix B), (2) the [www.disasterassistance.gov](http://www.disasterassistance.gov) website, (3) the <http://m.fema.gov> mobile website, and (4) via telephone. DAIP shares the information with NEMIS-IA to facilitate eligibility determinations and with other federal, tribal, state, local, and non-profit agencies/organizations that also service disaster survivors.

### **System Access:**

DAIP is internal to FEMA and only accessible to approved FEMA employees and contractors via the intranet or the FEMA Secure Sockets Layer (SSL) Virtual Private Network (VPN) Portal.<sup>100</sup>

### **Individuals Impacted:**

Disaster assistance applicants

FEMA NPSC Agents and Caseworkers

IT systems administrators

### **Sources of Information:**

The information in DAIP is collected directly from the survivors themselves. Survivors either call the FEMA Disaster Assistance Helpline, fill out a paper form, or apply online. The data requested is the same as FEMA Form 009-0-1 (English), "Application/Registration for Disaster Assistance," which collects PII and non-PII regarding survivor needs after a Presidential Declaration for Individual Assistance.

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<sup>100</sup> An SSL VPN is a means of allowing external users to securely access FEMA's network. This technology works through the web browser and all data flows as if it is on the internal FEMA network.



## **Data Elements:**

### **Registration and Assistance Records:**

- Disaster Number;
- FEMA Registration ID;
- Applicant/Co-Applicant Information:
  - Full Name;
  - Social Security number or alien registration number;
  - Signature;
  - Date of Birth;
  - Phone numbers;
  - Email addresses;
  - Position Title and Number of Years;
  - Employer Name;
  - Language(s) spoken;
  - Number of Dependents Claimed;
  - User ID;
  - Password; and
  - Personal Identification Number (PIN).
- Witness Signature;
- Damaged Dwelling:
  - Addresses of the damaged dwelling and the applicant's current location (if other than the damaged dwelling);
  - County;
  - Geospatial location of dwelling; and
  - Information related to residence (type, own/rent, damage sustained).
- Disaster-Related Expenses;
- Emergency Needs (Food, Clothing, Shelter);
- Special Needs (Mobility, Mental, Hearing, Vision, Other Care);





- Occupant and Household Information (for all occupants at the time of disaster):
  - Name (First Name, Middle Initial, Last Name);
  - Age;
  - Relationship to Applicant;
  - Dependent? (Yes/No);
  - Sex; and
  - Pre and Post-Disaster Income Information Of Those Occupants 18 Years of Age or Older.
- Business Damage:
  - Self-Employment is Primary Income? (Yes/No); and
  - Business or Rental Property Affected? (Yes/No).
- Authorization for Electronic Funds Transfer of Benefits:
  - Institution Name;
  - Account Type;
  - Account Number and Routing Number; and
  - Average Balance.
- Comments and Correspondence from the Applicant;
- Supporting documents to show proof of occupancy or ownership and verify identity, such as:
  - Driver's license or a government-issued picture ID;
  - Property title;
  - Tax bill; or
  - Utility bill.
- Public Records Information for Identity Verification;
- Pre-registration Questionnaire Information;
- Disaster Loan Status (Rejected, Approved, Declined, Verified, Cancelled);
- Travel and accommodations related information (e.g. flight information, travel assistance needs, companion information); and



- Information related to determining eligibility for assistance: date of the disaster, application status, insurance information, types and amount of damage to the dwelling, results of the home inspection (including inspector's notes and determination).

#### Information Provided by Third Parties:

- "Pass/Fail" flag (for identify verification provided by third-party identity verification service);
- Contracted address database (for address correction);
- Public records information used to pass the IdP.

#### Information Generated by NEMIS-IA During Processing and Returned to DAIP:

- FEMA Disaster Number;
- Application Status ("In-Process," "Submitted," or "Approved");
- Housing Inspection Required (Y/N);
- Priority of Assistance;
- Type of Assistance being considered; and
- Time Stamps.

#### DAIP Information Supplied by Partner Agencies:

- Change of Address Status Code (from the SSA);
- Disaster Loan Event Status Code (Rejected, Approved, Declined, Verified, Cancelled) (from the SBA);
- Pre-registration Questionnaire Information (from the U.S. Department of Labor);
- Pre-registration Questionnaire Session ID (from the U.S. Department of Labor);
- Food for Florida Pre-registration ID and Application Status (from the State of Florida); and
- HUD Household Data (from HUD).

#### SORN Coverage:

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



## **Virginia Systems Repository (VSR)**

### **Program/System:**

The Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Recovery Technology Programs Directorate (RTPD), Information Management Acquisitions Support & Tools (IMAST), Virginia Systems Repository (VSR).

### **Purpose and Use:**

The Virginia Systems Repository (VSR) is a multifaceted system that supports the Individual Assistance (IA) Division, including the NPSCs. VSR also interacts minimally with numerous other programs. The system houses 20 unique applications. VSR supports mission essential tasks including Transitional Sheltering Assistance (TSA), Continued Rental Assistance, Inspector Deployment Suitability, Call-Outs to disaster survivors to gather additional information, and immediate official communications and daily updates for the NPSC staff. VSR provides a tool to request ad hoc reports supporting: IA decision-making, operations briefings, FOIA requests, external affairs, and litigation. VSR houses applications that track housing inspector quality assurance data, provide support for the FEMA Human Resource department, and support the Applicant Services Human Services Specialist. All VSR applications are derived from one Oracle database, which houses a schema (i.e., database objects, tables, views, and stored procedures) for each application and a common library to house data and application functionality between applications. Intranet web pages are designed for user access on minor applications that require user interaction.

### **System Access:**

VSR applications and services are internal to FEMA and only accessible to approved FEMA employees and contractors via the intranet or the FEMA Secure Sockets Layer (SSL) Virtual Private Network (VPN) Portal.<sup>101</sup>

### **Individuals Impacted:**

Disaster assistance applicants  
FEMA NPSC Agents and Caseworkers  
IT system administrators  
FEMA housing inspectors

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<sup>101</sup> An SSL VPN is a means of allowing external users to securely access FEMA's network. This technology works through the web browser and all data flows as if it is on the internal FEMA network.



## **Sources of Information:**

All PII within VSR is collected directly from the applicant, employee, or contractor; or is replicated from the Enterprise Data Warehouse (EDW)/Operational Data Store (ODS) or NEMIS-IA. All information that is collected directly from an individual is entered by a FEMA employee, contractor, or the individual themselves.

## **Data Elements:**

Information collected by VSR includes:

### **Disaster Applicant PII:**

- Applicant's name;
- Home address;
- Phone numbers;
- Email address;
- Registration number;
- Last four digits of SSN;
- Assistance eligibility status;
- Information on pre- and post-disaster income and expenses;
- Special needs; and
- Applicant assistance status.

### **Information Collected about FEMA Contracted Housing Inspectors:**

- Inspector's name;
- Home address;
- Phone number;
- Location;
- Clearance information;
- Performance review score;
- Inspector number; and
- Applicant complaints against the inspector.



Information Collected from Employees/Contracted Employees:

- Employee Name;
- SSN;
- DOB;
- Home Address;
- Phone Number(s);
- Emergency Contact Information (i.e., name, address, phone, and email address);
- Salary/Grade/Step/Series;
- Date of Grade/Step Increase(s) and Next Projected Increase;
- Classified Title/Functional Title;
- Position Description Number and Position Identification Number;
- Historical Performance Ratings and History (Federal Human Resources Navigator is currently used for this function);
- Duty Station;
- Staff ID number;
- Work History at the NPSCs (i.e., position titles);
- Relevant Dates (i.e., Service Computation Date (SCD), hire date, Not To Exceed Date, and if applicable, deployment(s), transfer(s), and/or termination);
- Pertinent Computer Accommodations Program/Reasonable Accommodation (CAP/RA) Information (record of requests and equipment issued);
- Family Medical Leave Act (FMLA) Information (no medical data; only dates and status);
- Payroll;
- Codes Used Each Week;
- Hours Used for Each Code;
- Organizational Charts;
- Organizational Charts Based on Facility and Section; and
- Optional Content (i.e., name, functional title, phone, grade, status, and series/position description/job title).



**SORN Coverage:**

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).

DHS-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012).

DHS/ALL-021 Department of Homeland Security Contractors and Consultants, 73 FR 63179 (October 23, 2008).

DHS/ALL-023 Department of Homeland Security Personnel Security Management, 75 FR 8088 (February 23, 2010).



## **Disaster Management and Support Environment (DMSE) Cloud Environment**

### **Program/System:**

U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Disaster Management and Support Environment (DMSE) Cloud Environment (CE).

### **Purpose and Use:**

The DMSE CE is a central collaborative platform where FEMA posts and shares non-sensitive response and recovery information and geospatial imagery. Information contained within the platform comes from the entire emergency management community including: federal, state, local, tribal, voluntary agencies, private sector, faith-based partners, survivors, and Department of Defense (DoD), and includes information unique to a particular incident or disaster. DMSE CE enables publishing, sharing, overlaying, and exploiting non-PII data (such as maps and geospatial imagery) in a collaborative environment in order to better-inform operational decision making.

DMSE CE warns approved users not to store any PII, whether located on a map layer, in a dataset, or in direct storage. There will be a banner at the top of each page that warns users not to post or store PII in DMSE CE applications. The DMSE CE provides approved mission-relevant data for stakeholders to leverage in value-added ways such as: research, analysis, application development, and other purposes. DMSE CE also provides an agile development and testing platform for applications to be made available to the public or emergency management community.

It should be noted that FEMA does not require the public to establish a user account in order to openly view available content; however, if anyone wants to save or publish created maps, he or she would need a user account. FEMA only accepts users with a federal supervisor's approval or with a federal sponsor's approval in the case of the public.

DMSE CE provides 9 minor applications:

- Disaster Planning Atlas (DPA): Creates PDFs of maps based on U.S. National Grid. After a disaster, when the "normal" means to describe locations, such as street signs, are gone, the U.S. National Grid provide a standardized grid reference system that is seamless across jurisdictional boundaries and allows for pinpointing exact locations. This application does not gather or use any PII.
- Disaster Survivor Assistance (DSA) Survivor Mobile Assistance Reporting Tool (SMART): The DSA SMART application is a mobile application (iOS only) used on



mobile devices, such as iPads, by FEMA's DSA cadre workforce. The application provides a mapping capability by using Collector for ArcGIS, which is a commercial off the shelf product (downloadable from the Apple App Store). The DSA SMART application is used by DSA teams to capture operationally-relevant information regarding the impacts of a disaster on individuals and local communities following a Presidential Declaration for Individual Assistance. This application does not collect survivor PII. The DMSE CE system boundary only provides a centralized repository for the data collected by DSA teams.

- Through use of the DSA SMART application, DSA cadre interact with disaster survivors and capture observations related to the impacts of the disaster. The DSA cadre may capture general information, including whether or not the individual has applied for assistance (FEMA only captures yes/no response; no survivor PII is captured). This information allows FEMA and decision makers to better understand the severity and impact of the disaster, and supports better planning of financial assistance and other possible aid provided to survivors.
- The DSA cadre may also capture observations related to damage sustained due to a disaster (e.g., downed powerlines, fallen tree). The DSA cadre may capture a photograph of the observation and geo-tag the photo, creating a "pin" on a map, to provide location information to support response efforts. When clicked on, the pins reveal which cadre member submitted the observation and photo. Photos of individual survivors or DSA cadre members are not captured.
- FEMA Public Data Visualization: Displays FEMA-built visualizations of publicly available datasets that provide a visual representation of grant data as it relates to fire, preparedness, mitigation, and public assistance. This application does not gather any PII.
- Flood Insurance Estimator: Provides the public with a way to estimate flood insurance needs and rates via publicly-available flood insurance information. This application does not gather any PII.
- GPX Uploader: Facilitates the upload of G Garmin Global Positioning System (GPS) field data to be aggregated in the Iron Sights Mapping Service in support of Urban Search and Rescue (US&R). This application does not gather any PII.
- OpenFEMA: Delivers mission data to the public in machine-readable formats. Provides timely, usable, and accurate information to the public, specifically, data in a raw format, enabling stakeholders to leverage the data in innovative and value-added ways. This application does not gather any PII.





- Preliminary Viewer: Displays digitally-printable loss estimates and damages from a hurricane for the public. This application does not gather any PII.
- Preliminary Damage Assessment (PDA): Captures and verifies the damage at a specific physical location after a disaster in order to determine whether a federal disaster declaration is warranted. This application collects the address of the damaged property and the business contact information of a state, local, tribal, or territorial government (SLTT) official. PDA data is never linked to an individual survivor.
- Rebuild Tool: Provides input on planned rebuilds around flood information to the public. This application does not gather any PII.
- Survivor Sheltering Assessment Tool (SSAT): Collects information regarding the housing needs of individuals and families in shelters so that services and assistance can be provided to transition them out of shelters and into temporary housing solutions as quickly as possible. Individualized data collected in the shelters would be compared to survivor registration data in NEMIS-IA to determine:
  - Has the person in the shelter registered?
  - If registered, what is the status of the registration? Does he or she have resources such as Transitional Sheltering Assistance (TSA) eligibility or financial rental assistance available to the person?
  - If registered and not eligible, is there casework that could be performed to find eligibility?
  - If not registered, information would be provided to the Joint Field Office (JFO) to have a registration strike team travel to the shelter and register the survivor.

Aggregated reports would be built to support JFO planning activities for shelter depopulation to ensure that survivors are transitioned as quickly as possible to housing solutions that best meet their need.

### **System Access:**

In order to obtain an account, any FEMA, state, local, territorial, or tribal employee or contractor who requires access to DMSE CE must provide his or her full name, email address, work phone number and the name, phone number, and the email address of a sponsor or supervisor. The regional geospatial coordinators, along with the DMSE program office, review the applications and vet the individual for system use. The DMSE program office decides who can access the system. It should be noted that while FEMA does not require the public to establish a user account in order to openly view available content on DMSE, if anyone wants to save or publish created maps, he or she would need a user account. FEMA only accepts users with a federal



supervisor's approval (submitted via email) or with a federal sponsor's approval in the case of the public.

**Individuals Impacted:**

Individuals that require access to DMSE CE include the entire emergency management community:

- FEMA staff;
- FEMA reservists;
- Federal, state, local, tribal, voluntary agencies;
- Private sector partners;
- Faith-based partners;
- Department of Defense;
- All DHS employees/contractors and components, including:
  - United States Citizenship and Immigration Services (USCIS);
  - United States Customs and Border Protection (CBP);
  - United States Coast Guard (USCG);
  - Federal Law Enforcement Training Center (FLETC);
  - United States Immigration and Customs Enforcement (ICE);
  - Transportation Security Administration (TSA);
  - United States Secret Service (USSS);
  - National Protection and Programs Directorate;
  - Directorate for Management;
  - Science and Technology Directorate;
  - Countering Weapons of Mass Destruction Office;
  - Office of Health Affairs;
  - Office of Intelligence and Analysis;
  - Office of Secretary and Executive Management;
  - FEMA Corps; and,
  - Contractors working on behalf of DHS.



Other individuals impacted by this system include survivors and those individuals who are surveyed by the DSA and PDA teams.

### **Sources of Information:**

Data and information includes information unique to a particular incident or disaster and is based on the data elements listed below and comes from the responders assigned to the emergency management community including: federal, state, local, tribal, voluntary agencies, private sector, faith-based partners, survivors, and DOD.

### **Data Elements:**

DMSE CE collects the following for the purposes of granting an account to FEMA employees and contractors:

- First and last name;
- Phone number;
- Email address;
- User ID; and
- Supervisor's name and work contact information.

Information collected by DSA SMART and hosted in DMSE includes:

- Survivor interaction;
- Location (in the form of a pin dropped on a map; the pin is typically dropped in the middle of a street, rather than at an individual's home);
- User name of the user who created the pin;
- Registration Status (yes/no);
- Revisit (yes/no);
- Update/Inquiry (yes/no);
- Referral (yes/no);
- General Notes;
- Public Safety Issue (yes/no);
- Running Water (yes/no);
- Functioning Energy (yes/no);
- Communication (Telecom) (yes/no);



- Private Sector Issue (yes/no);
- Mass Care (Shelter) (yes/no);
- Disaster-specific data;
- Community contacts:
  - First name and last name;
  - Title;
  - Organization name;
  - Organization type;
  - Organization address;
  - Organization phone;
  - Organization fax;
  - Organization email; and
  - Organization services, notes;
- Infrastructure (Accessibility).

Information collected by SSAT includes:

- FEMA Registration ID (if available);
- First Name;
- Last Name;
- Damaged Dwelling Address; and,
- Mobile Phone Number.

Other non-PII elements collected for SSAT:

- Date of collection;
- Shelter Name;
- County;
- Owner/Renter of a damaged dwelling;
- Pre-disaster HUD housing such as Section 8, subsidized housing, etc. (Y/N);
- Pre-disaster homeless (Y/N);



- Identified available rental (Y/N);
- Plan to return to pre-disaster residence (Y/N);
- Will live with family or friends (Y/N);
- Waiting on DD (Damaged Dwelling) to become accessible (Y/N);
- Inaccessible due to road closure (Y/N);
- Inaccessible due to water receding (Y/N);
- Identified available housing or hotel resource but not within reasonable commuting distance (Y/N);
- Cannot find affordable housing resource (Y/N);
- Cannot find short term lease (Y/N);
- Transportation issues:
  - Transportation disaster damage, need assistance for repairs (Y/N);
  - Cannot meet with inspector (Y/N); and
  - Cannot get to desired area to look for housing (Y/N).
- No desire to relocate out of state within 50-100 mile radius (Y/N);
- Need specialized medical equipment (sensory, mobility, accessibility, etc.) (Y/N);
- Need funds to move household belongings (Y/N);
- Utilities not currently operable (Y/N);
- Electricity not currently operable (Y/N);
- Expected date of utility restoration (if known) (Y/N);
- Nowhere for my pet to board (Y/N);
- Type of pet(s);
- Need voluntary agencies to assist with mucking out home (Y/N);
- Number of Adults (18+);
- Number of Children (Under 18);
- Consent to Share (Y/N); and
- Notes.



Information collected by PDA about SLTT government officials includes:

- Name;
- Work phone number; and
- Work email address.

**SORN Coverage:**

DHS/ALL-004 General Information Technology Account Access Records (GITAARS), 77 FR 70792 (November 27, 2012).

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



## **Automated Construction Estimating (ACE)**

### **Program/System:**

The Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Recovery Technology Programs Directorate (RTPD), ACE.

### **Purpose and Use:**

The Automated Construction Estimating (ACE), an Android-only mobile application, provides the capability for field inspectors to inspect properties and electronically record information pertaining to the damage caused by a disaster. ACE receives specific registrant data, from NEMIS-IA, the system that maintains the disaster survivor's application information and is used to administer the IA program. The ACE system uses the IA data to process housing inspections, and does not typically collect any new PII. NEMIS-IA sends data, including applicant name, address, and phone number, to the ACE system, based on the inspections assigned to a specific inspector. The housing inspectors, who are FEMA contractors, use the information to verify application data with the applicant (conduct ID check, verify the address and phone numbers of the applicant) and to capture relevant information to verify damage of property through a visual inspection. Each housing inspector only has access to those registrations that are assigned to him or her.

During the inspection, the housing inspector collects information related to the damage sustained by the property; no additional PII is collected during a typical housing inspection. In rare cases, inspectors may collect and enter information into ACE in order to modify applicant information within the NEMIS-IA system or add a co-applicant (this information could include address or SSNs depending on the case). In such instances, the information is transmitted to NEMIS-IA system.

Upon completion of the inspection, the inspector transmits the inspection data from ACE back into the NEMIS-IA system. After the data has been uploaded back to NEMIS-IA, it is automatically purged from the ACE system. The results of the housing inspection are used by FEMA to determine the level of assistance provided to the survivor.

### **System Access:**

Housing inspectors use FEMA-provided tablets that have the mobile app installed on them. Inspectors use a user name and password in order to access ACE.

### **Individuals Impacted:**

Disaster assistance applicants; and

FEMA's in-house and contracted inspectors and inspection staff.



## **Sources of Information:**

ACE receives information from NEMIS-IA about the survivor, including name; registration ID; date of birth; address and contact information; and information regarding damage to the property. The inspector verifies this information with the survivor, and may collect modified information from the survivor, such as an updated address or phone number, or additional information to be added to an existing application, such as adding a co-applicant. During the inspection, the housing inspector performs a visual validation of the property damage that occurred during the disaster. The inspector makes observations and may document the damage through photographs.

## **Data Elements:**

- Name;
- Registration ID;
- Date of Birth;
- Address and Contact Information;
- Phone number; and
- Information Regarding Damage to the Property.

## **SORN Coverage:**

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).





## **FEMA IHP Program Management Section CRM**

### **Program/System:**

FEMA Office of Response and Recovery, Individual Assistance Individuals and Households Program–Program Management Section, FEMA Salesforce Customer Relationship Manager (CRM).

### **Purpose and Use:**

FEMA Salesforce Customer Relationship Management (CRM) will improve the management of correspondence from requestors seeking the assistance of the Program Management Section IHP Helpdesk. The IHP Helpdesk is an internal FEMA helpdesk that provides support and addresses IHP-related inquiries and issues submitted by FEMA staff at Headquarters, JFOs, DRCs, or other disaster relief offices. The CRM is a web-based helpdesk portal that allows visitors, to include both FEMA and non-FEMA users (such as the SBA), to submit questions or comments about problems or issues with IA applications and applicant files that are managed through a case format. Users of the CRM portal create accounts and enter inquiries via a web form.

### **System Access:**

SalesForce CRM is an encrypted, internal FEMA application that is only accessible to approved FEMA personnel via the intranet or the FEMA Secure Sockets Layer (SSL) Virtual Private Network (VPN) Portal.<sup>102</sup>

### **Individuals Impacted:**

FEMA employees

FEMA partners who have access to the FEMA Intranet

Individual Disaster Applicants who are the subject of inquiries

### **Sources of Information:**

NEMIS-IA

### **Data Elements:**

The CRM collects user contact information such as name, email address, and contact number to create an account. Inquiries to the CRM can contain name, registration ID, or case file number, mailing address, and attachments that could include copies of documents. Documents could contain sensitive PII.

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<sup>102</sup> An SSL VPN is a means of allowing external users to securely access FEMA's network. This technology works through the web browser and all data flows as if it is on the internal FEMA network.



**SORN Coverage:**

DHS/FEMA-008 Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013).



## Appendix B: Forms



The following forms are used to collect survivor PII in order to provide disaster assistance:

<i><b>OMB Control Number</b></i>	<b>FEMA Form Number</b>	<b>Form Title</b>
<i>1660-0002 Disaster Assistance Registration</i>	009-0-1 (English)	Application/Registration for Disaster Assistance
	009-0-2 (Spanish)	Solicitud en Papel/Registro Para Asistencia De Desastre
	009-0-1T (English)	Tele-Registration Application for Disaster Assistance
	009-0-1Int (English)	Internet Application/Registration for Disaster Assistance
	009-0-2Int (Spanish)	Internet, Registro Para Asistencia De Desastre
	009-0-1S (English)	Smartphone Application for Disaster Assistance
	009-0-2S (Spanish)	Smartphone, Registro Para Asistencia De Desastre
	009-0-3 (English)	Declaration and Release Form
	009-0-4 (Spanish)	Declaración Y Autorización
	009-0-5 (English)	Temporary Housing Program- Receipt for Government Property
009-0-6 (Spanish)	Recibo de la Propiedad del Gobierno	
<i>1660-0061 Federal Assistance to Individuals and Households Program</i>	010-0-11	Administrative Option Selection
	010-0-12	Application for Continued Temporary Housing Assistance
	010-0-12S (Spanish)	Programa de Individuos y Familias Solicitud para Continuar la Asistencia de Vivienda Temporera
<i>1660-0030 Manufactured Housing Operations</i>	010-0-9	Request for Site Inspection
	010-0-10	Landowner's Authorization Ingress-Egress Agreement



	009-0-130	Manufactured Housing Unit Maintenance Work Order
	009-0-136	Manufactured Housing Unit (MHU) Installation Work Order
	009-0-138	Manufactured Housing Unit Inspection Report
<i>1660-0138 Direct Housing Program</i>	010-0-9	Request for Site Inspection
	009-0-131	Manufactured Housing Unit Sales Calculator
	009-0-134	Recertification Worksheet
	009-0-135	Temporary Housing Agreement
	009-0-137	Unit Pad Requirements Information Checklist
	009-0-129	Ready for Occupancy Status
<i>1660-0011 Debt Collection Financial Statement</i>	127-0-1	Debt Financial Statement
<i>1660-0142 Survivor Sheltering Assessment</i>	009-0-42	Survivor Sheltering Assessment Tool