



Privacy Impact Assessment
Appendix for the

National Flood Insurance
Program (NFIP) PIVOT
System

DHS/FEMA/PIA-050

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Appendix A – Pivot Functions, Modules, and Applications

The Pivot General Support System (Pivot GSS) includes hardware, software, National Flood Insurance Program (NFIP) data, and applications used to assist FEMA in managing the NFIP. Pivot GSS provides a supporting infrastructure and services to allow all other applications to function. While the Pivot GSS does not itself use or maintain PII, it hosts other Pivot applications that process PII, as outlined below.

1) Pivot Portal

Purpose and Use

FEMA has built out the Pivot Portal functionality with the NFIP General Support System (GSS). This functionality allows FEMA to authenticate and provision users for access to Pivot and its applications. FEMA employees and contractors are authenticated and provisioned using the FEMA Authentication and Provisioning System (APS) and use their FEMA-issued Personal Identity and Verification (PIV) card to access the portal, while non-FEMA employees are provisioned through the use of a username and password.

The Pivot Portal is the secure gateway for access and use of the NFIP's essential applications: Floodsmart (FLSM), Claims and Policy (CAP), Document Case Management Tool (DCMT), Risk Rating Engine 2.0 (RRE), and Pivot Analytics and Reporting (PART). It provides an integrated location for Registration, Authentication, and Authorization services allowing users to access the transactional system of record, appeals, and reporting tools. The portal effectively incorporates user, access, and Write Your Own (WYO) and Vendor relationship management services, granting both internal (FEMA and Application) and external (WYO and Vendor) admins the ability to efficiently manage their assigned roles, groups, and resources. In addition, the Pivot Portal provides machine-to-machine connection necessary for the transmission of transactional records. Lastly, the portal provides the applications the ability to implement critical separation that is needed to ensure that SPII and companies' confidential information is not exposed to other participating companies or viewable by unauthorized outside parties.

System Access

The Pivot Portal allows NFIP stakeholders to self-register for access to the Pivot system via a public-facing user interface. Users request access by completing and submitting a registration form – this registration includes basic information like a user's organization and the reason for the access request. Users may request access to multiple Pivot sub-applications at once. The portal provides a fully integrated, secure, role-based authentication and authorization service that supports Single-Sign-On (SSO) capabilities via PIV cards, as well as authentication and authorization for machine-to-machine and external users.

- Internal users (FEMA Employees and Contractors)

- External users (WYOs, Vendor, State, etc.)

Individuals Impacted

- FEMA Employees and Contractors
- Write Your Own Staff
- Flood Vendor Staff
- State Hazard Mitigation Officers, Floodplain Managers, and other state officials
- Other future external users (e.g., private sector, research/university)

Sources of Information

The Pivot Portal receives an internal user's information from the FEMA Enterprise Identity Management System (FEIMS). External users (unless preloaded and approved by the Industry Management Branch) must enter in their information in the registration page.

Data Elements

Registration Records:

- Internal User:
 - FEMA ID
 - Name
 - FEMA Email Address
 - Phone Number
 - FEMA Office, Division, Branch
 - Supervisor email approving access
 - Work reason needed for access
- External User:
 - Name
 - Email Address
 - Phone Number
 - Organization Type (WYO or Vendor; State, Local, Tribal, or Territory; Other Federal Agency; Other)
 - Organization Name

- Username/Password

SORN Coverage

DHS/ALL-004 General Information Technology Access Account Records System (GITAARS)

2) FloodSmart (FLSM)

Purpose and Use

Pivot FLSM and the Floodsmart website support NFIP's national marketing and outreach program called FloodSmart. The FloodSmart website is the main avenue for the NFIP to provide critical information about and how to obtain flood insurance. Floodsmart websites include:

<p>www.floodsmart.gov agents.floodsmart.gov nfipservices.floodsmart.gov www.nfip.fema.gov</p>

NFIP is updating the Pivot FLSM to allow the general public to enter address information in order to obtain a list of certified flood insurance agents in the area of a property. FEMA will share the point of contact information of WYO insurance programs and insurance agents for the purpose of marketing the NFIP and facilitating communication between potential customers and agents. WYO and insurance agents supporting NFIP will manage and update their POC information by accessing the Pivot Portal.

The Risk Rating Engine (described in more detail below) will create a cost estimating tool that will reside on Floodsmart.gov and allow potential customers to input their address and several building factors to receive a flood insurance cost estimate. This data will not include customer PII (other than address) and will not be stored within Pivot. It is an informational tool to give potential customers a rough estimate for the cost of flood insurance.

System Access

No login is required for visitors to access the public Floodsmart websites. The Privacy Policy posted as a link on the website will serve as notice to visitors of the information that may be collected and stored automatically, depending on the functions performed during the visit.

FEMA employees and contractors will only have access to the backend of the website to update pages and maintain the website through SSO using their FEMA-issued PIV cards.

Individuals Impacted

- Insurance Agents

Sources of Information

- Insurance Agents

Data Elements

- Insurance Agents
 - Insurance agent's identifier number
 - Name
 - Office address
 - Office telephone
 - Cellular phone
 - Email address
 - Website Address

SORN Coverage

DHS/FEMA-003 National Flood Insurance Program Files System of Records

DHS/ALL-004 General Information Technology Access Account Records System
(GITAARS)

3) Claims and Policy (CAP)

Purpose and Use

Pivot CAP is the application that processes and verifies all new policies and policy renewals as well as all flood insurance claims. Flood insurance companies provide information to Pivot CAP via an automated push/pull of data from their vendor system.

The policy application receives the submittals for flood insurance and checks against:

- The U.S. Postal Service for a valid street address
- The Department of Interior for properties that reside within a coastal barrier reef (properties within this zone cannot obtain insurance)
- CoreLogic to geotag the location

The NFIP Pivot system includes a pre-production environment to test changes to the claims, policies, and reports applications to ensure accuracy. The Pivot CAP application requires the use of production data in its pre-production environment to ensure accuracy that test data cannot provide. Scrubbed data would prevent the application from working properly because dummy data would cause the system to reject these tests. More importantly, the NFIP changes the

rates of flood insurance policies and other rules twice a year. Pivot needs to be able to test and validate these changes within the pre-production environment with production data in order to properly test and validate the results before implementing these changes in production. Pivot's Authority to Operate (ATO) includes the production, pre-production, and beta environments. Pivot enforces the same controls and processes with the pre-production environment as the production environment to protect the integrity of the data.

System Access

Each user will access the CAP application via the Pivot Portal. Users will be assigned specific roles and permissions to be able to perform only authorized functions within CAP. FEMA users will access CAP from a web interface using their PIV credentials. External users, such as WYOs, will access the system from their web browser using a username and password login. Lastly, vendor systems will interact in near real-time with the CAP Service Application Program Interface (API). Each service will maintain its own API and user interface, depending on the service's function. Information will flow from and to external systems in order to process business rules, present ratings, check geographic boundaries, and complete other functions.

Individuals Impacted

- FEMA/Federal Insurance and Mitigation Administration (FIMA), specifically users within the Federal Insurance Directorate, Product Delivery Division, and Policyholder Services Division and their associated branches
- WYO companies and their flood vendors
- FEMA contractors with IT support responsibilities
- Third parties supporting WYO companies in performing operational functions related to the management of flood policies and processing of accurate claims payment following a flood event (third parties may include expert service providers (e.g., engineers), adjusters, or legal counsel)

Sources of Information

The CAP application collects information directly from WYOs, their Flood Vendors, FEMA/FIMA applications, or third parties supporting WYO companies in performing the management and handling of all claims and policies across the entire NFIP program. Third parties may include expert service providers (e.g., engineers), adjusters, or legal counsel.

CAP receives and/or provides data to the following that are referenced in the PIA:

1. USPS
2. Community Information System (CIS)
3. Department of Interior Fish & Wildlife

4. RAM - National Flood Hazard Layer (referenced as FEMA Map Service Center)
5. U.S. Small Business Administration (SBA)
6. WYO/Vendor systems
7. NFIP Direct

CAP receives and/or provides data to the following new data sources not previously discussed in the PIA:

1. Flood Insurance Directorate Customer Relations Management (FID CRM)
2. CoreLogic

The NFIP Claims Team leverages FID CRM to enable historical tracking for the various inquiries requiring a response from the Claims Team. NFIP Pivot integrates an API with the FID CRM System. This connection allows NFIP Salesforce Customer Service Representatives (CSRs) to access NFIP policy and claims information while assisting customers and the public. Information within NFIP Pivot such as name, policy number, or other claims information may be noted in the NFIP Salesforce CRM to document the conversation and to better address the inquiry.

Pursuant to an Information Sharing Agreement (ISA) with CoreLogic, NFIP Pivot integrates an API with CoreLogic to provide a more accurate location of a property. The CoreLogic web service will be used when a new property is issued flood insurance and will provide the physical address of the property. The Geocoding API will return a latitude/longitude coordinate and CAP will store this geocode alongside the physical address in the database. CoreLogic is also used for Pivot Analytics and Reporting (PART) and the Risk Rating Engine (REE) as discussed in this appendix.

Data Elements

Pivot CAP data elements:¹

- 1) NFIP policy information about past, current, or potential flood insurance policyholders:
 - Policyholder and Policy Information
 - Name
 - Insured Property Address
 - Latitude/Longitude of Property Address
 - Home Mailing Address
 - Policy Premium Amount

¹ Pivot CAP contains historical data for the NFIP, but all Social Security numbers (SSN), which were collected prior to 2008, have been removed.

- North American Industry Classification System
- Allocated Loss Adjustment Expense Amounts
- Actual Cash Values of Building and Contents
- Coverage Information
- Deductible Information
- Reason for Policy Closing Without Payment
- Applicable Policy Dates
- Fees and Numbers
- Program Types
- Replacement Cost Values
- Risk Rating Methods
- Rollover Indicators
- Previous Loss Amounts Paid
- Date of Loss
- Water Damage Information
- Insurance Coverage
- Deductible Amount
- Claim Payment Information
- Flood Risk Zone
- Participating Flood Community Name
- Building or Residence Location
- Construction Details
- Contents Details (machinery, equipment, and other items inside individual homes or businesses that could be damaged by flooding)
- Insurance Company Information
- WYO Company Name
- WYO Company Unique Identifier (assigned by FEMA)

2) Community Information System (CIS) Data Elements:

- Community Official Name
- Official Title
- Professional Address
- Professional Email Address
- Community Website Address
- Professional Phone Number
- Professional Fax Number

3) Internal (FEMA) Users of NFIP Pivot:

- Username
- User Digital Certificate (encrypted data from FEMA PIV Card)

4) External Users of NFIP Pivot

- System User Account information (including user accounts for WYOs, flood vendors, and the general public)
- Name
- User Identification
- User Password
- Email Address
- Phone Number

SORN Coverage

DHS/FEMA-003 National Flood Insurance Program Files System of Records

DHS/ALL-004 General Information Technology Access Account Records System (GITAARS)

4) Risk Rating Engine 2.0 (RRE 2.0)

The NFIP RRE 2.0, a new Pivot application, is a rating engine that will replace the current rating engine being used by Pivot. RRE 2.0 has two components:

- 1) RRE 2.0 integrates with the Claims and Policies (CAP) application to validate all new policies and policy renewals. The main function of RRE 2.0 will be to allow FEMA to generate a more accurate NFIP policy quote for premiums.



- a. WYOs/Vendors submit a request for a policy quote through RRE 2.0 via API to determine the actual cost of flood insurance for the property. The quote request is not retained by RRE 2.0 for the actual policy submission.
- b. The WYO/Vendor will then transmit the policy to CAP via API. RRE 2.0 interacts with CAP during the policy validation and provides the policy quote which should match with the policy the vendor submitted.

RRE 2.0 will use information from customer or insurance agent input, RiskMap data, other third-party sources such as the U.S. Army Corp of Engineers and the U.S. Geological Survey, and third-party commercial sources to determine the policy quotes. NFIP will use the RRE 2.0 to generate a quote and validate all new and renewal policies for both WYO and NFIP Direct administered policies. NFIP will also use RRE 2.0 to support Pivot CAP during the NFIP policy underwriting process. Additionally, when official requests for flood insurance are submitted to Pivot CAP, Pivot CAP calls RRE 2.0 to obtain the correct premium as part of the validation process.

- 2) The RRE 2.0 cost estimator application, which will reside on the Floodsmart website for the general public, is an informational tool to give potential customers an estimate for the cost of flood insurance WYOs and agents.

Potential customers input other building factors² to receive a flood insurance cost estimate. These factors may include:

- Flood risk (e.g., your flood zone)
- The type of coverage being purchased (e.g., building and contents coverage)
- The deductible and amount of building and contents coverage
- The location of your structure
- The design and age of your structure
- The location of your structure's contents (e.g., Are your utilities elevated?)
- The property's elevation

System Access

FEMA staff will be able to access RRE 2.0 via the Pivot Portal using PIV cards. WYOs and Vendors will use API calls to receive quotes for flood insurance. Potential customers will be able to receive a flood insurance cost estimate on the Floodsmart website.

² <https://www.floodsmart.gov/costs/why-am-i-paying-this-amount>.

Individuals Impacted

- FEMA/FIMA Actuaries and Personnel
- WYOs and Vendors
- General public

Sources of Information

- WYOs and Vendors
- CoreLogic
- U.S. Census Bureau
- U.S. Geological Survey
- Actuaries / Milliman
- U.S. Army Corp of Engineers
- Community Information System (CIS)
- Floodplain Management
- Geocoding Solution

Data Elements (Registration and Assistance Records)

- Address
- Latitude / Longitude
- Census block
- Base rate
- Barrier island
- Distance to coast
- Elevation
- Distance to Ocean (barrier island only)
- Elevation relative to river by Hydrologic Unit Codes (HUC) grouping
- Distance to river by HUC grouping
- Relative elevation evaluation
- Local relative elevation

- Stream order
- Territory
- Leveed areas
- Catastrophe provision
- Vents
- Monitoring & Evaluation (M&E) above first floor
- Constructions type
- Number of stories
- Foundation type
- First floor height by GIS rate
- Prior claim
- Number of claims
- Replacement cost
- Building coverage amount
- Contents coverage amount
- Building deductible amount
- Contents deductible
- Occupancy type
- Build date
- Newly mapped
- NFIP participants status
- Community Rating System (CRS) discount by Community Identification (CID)
- Severe Repetitive Loss (SRL)
- Floodproofing
- Lowest Adjacent Grade (LAG) from Elevation Certificate
- First floor heights from E.C.
- Probation surcharge

- Primary residence indicator
- Federal policy fee
- Premiums
- Rates
- Prior claims
- Coverage value
- RRE NAIC number
- RRE transaction date
- RRE quote date
- RRE quote expiration date
- RRE transaction key

SORN Coverage:

DHS/FEMA-003 National Flood Insurance Program Files System of Records

DHS/ALL-004 General Information Technology Access Account Records System (GITAARS)

5) Pivot Analytics and Reporting (PART)

Purpose and Use

The Pivot Analytics and Reporting Tool (PART) provides FIMA the capability to upload data from various sources to conduct research and analysis, develop reports, and provide real time dashboards for FIMA, WYO's, Vendors, State and local officials, and other audiences. For example:

- PART will overlay aggregate median incomes onto maps of hurricane-prone areas with data on the number of flood insurance policies in that area to help FEMA understand the impact of increased premiums on customers in a high-risk zone.
- PART will collect survey results from customers who have experienced a flood and who have gone through the claims process to allow FEMA to see how long it takes a customer to receive money and how satisfied they are with the process.
- PART will develop reports based on past claims and policy coverage that will be used during a disaster to predict what type of damages may occur, how much the damage may cost, how many citizens in the area are covered by flood insurance and where staff

and resources should be placed.

System Access

PART is accessible via the Pivot Portal for internal and external users. Internal FEMA staff and contractors access PART via SSO using PIV card. External user's login using username/password via the external Pivot Portal authentication. Access to reports are restricted by organization, group, and role.

Individuals Impacted

- IT system administrators
- FEMA Employees and FEMA Contractors
- Insurance WYO Users
- Insurance Vendor Users
- State, Regional, Community Users

Sources of Information

The PART system holds all NFIP historical data, but receives a nightly update from CAP regarding all new policies and claims approved within the last 24 hours.

Additionally, PART uses or receives data from the following sources:

1. Verint ForeSee
2. Housing and Urban Development (HUD)
3. Geospatial Data
4. Other Pivot applications including DCMT
5. Community Information System (CIS)

PART receives aggregated survey results from ForeSee, a commercial company that uses science-based methodology for measuring and improving customer experience. This information allows NFIP to import the results of surveys into PART and build reports and dashboards and better drive business decisions. The surveys do not contain PII. Initially, FEMA will manually pull aggregated survey results from ForeSee into PART. Eventually, NFIP will finalize an ISA with ForeSee to automatically sync the data into PART.

PART will aggregate publicly available data from Housing and Urban Development about median income. Median income is used to analyze the impact of increased premiums on customers in a high-risk zone.

PART will import publicly available or U.S. Geological Survey geospatial data for

developing maps. Maps of hurricane-prone areas are used to perform analysis with data on the number of flood insurance policies in that area.

PART will import data from other Pivot applications including DCMT.

The Community Information System (CIS) provides flood zone and community NFIP participation status data on a daily basis to Pivot, via web service-style inquiry. The CIS data is used to update community information within the Pivot community master file database, which is needed by the WYO companies to determine if a property is eligible for flood insurance coverage. This data includes information related to a community official POC, which includes professional elected/employee positions, such as Mayor or the City/Town/Village Building Official.

PART will provide PII data to National Emergency Management Information System (NEMIS)-IA via API. Pivot finalized an MOU with NEMIS-IA to provide IA customer data, a subset of NFIP. IA receives requests for assistance from disaster survivors and checks to see if the survivor has a flood insurance policy as part of its validation process. If the survivor has a valid flood insurance policy, then the survivors request for compensation is rejected because they will receive a flood insurance claim to repair their property.

Data Elements

The primary data PART stores include:

Policy Records

- Policy Number
- Company Code
- Policy Status Indicator
- Policy Termination Date
- Cancellation/Voidance Reason
- Cancellation Original Run Date
- Reinstatement Date
- Total Premium Refund
- Federal Policy Fee – Refunded
- Reinstatement Reserve Fund Assessment Refund
- Homeowner Flood Insurance Affordability Act (HFIAA) Surcharge Refund
- New/Rollover/Transfer Indicator

- Original Run Date
- Current Policy Effective Date
- Address
- Policy Longitude/Latitude
- Policy Geo result
- Policy Geo census

Claim Records

- Address
- WYO Prefix
- Date of Loss
- Policy Number
- Claim Status Indicator
- Catastrophe Number
- Cause of Loss
- Final Payment Indicator
- Claim Closed Without Payment Reason
- Closed Without Payment Reason
- Claim Closed Without Payment Reason
- Replacement Cost Indicator
- Increased Cost of Compliance (ICC) Claim Indicator
- ICC Mitigation Indicator
- Coinsurance Claim Settlement Indicator
- HFIAA Loss Indicator
- Water Depth - Relative to Main Building
- Expense of Contents Removal
- Expense of Manufactured (Mobile) Home Removal
- Total Expense of Temporary Flood Protection

- Total Property Value - Main and Appurtenant
- Total Building Damages - Main and Appurtenant
- Total Damage to Contents - Main and Appurtenant
- Claim Open Date
- Claim Reopen Date
- Claim/Loss Closed Date
- Claim Origination Date
- Claim Last Date
- Payment Limit
- ICC Prior Date of Loss
- ICC Actual Expense
- ICC Prior Damage
- ICC Previous Property value
- ICC Current Property Value
- Foundation Type
- Exterior Wall Structure Type
- Exterior Wall Surface Treatment
- Flood Characteristics
- Factors Related to Cause of Loss
- Substantial Improvement Indicator
- Duration Building Will Not Be Habitable
- Deductible
- Building Damage Subject to Policy Exclusions (ACV)Content Damage Subject to Policy Exclusions (ACV)
- Value of Building Items Subject to Policy Exclusions (ACV)
- Value of Contents Items Subject to Policy Exclusions (ACV)
- Duration of Flood Waters in the Building

- Alteration Date
- Property Value
- Value of Contents (ACV)
- Damage
- Damage to Contents
- Data Warehouse Load Date
- Exterior Water Depth
- Water Depth – Main
- Interior Water Depth – Appurtenant
- Adjuster Individual Flood Control Number
- Adjusting Firm Flood Identifier

Community Dim[ension] Records and Community Master Table

The Community Dim Records are used as the official lookup for valid community listing information. The community master table has one record per community with community name, current probation and suspension status, and withdrawal date. This table is used as the official lookup for valid community listing information and contains the following data elements:

- Community name
- Dates entry into the regular program
- Emergency program
- Current Flood Insurance Rate Map (FIRM) date
- Flood Hazard Boundary Map (FHBM) date
- Current community status information, including current status, probation and suspension dates, and withdrawal date
- Names, addresses, and phone numbers of community personnel, namely the CEO, flood plain administrator, and other point of contact

Company Master Records

The Company Master Records are used regularly to add company and vendor information into policy and claims reports. It is used regularly to pull in company names. The table also has vendor codes, but does not contain vendor names, so PART routes that data through the vendor

lookup table. The Company Master Records contain the following data elements:

- Company name
- NAIC number
- Vendor name
- Vendor number and active status
- Name
- Address and other info

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DHS/ALL-004 General Information Technology Access Account Records System (GITAARS)

6) Document Case Management Tool (DCMT)

Purpose and Use

DCMT consists of a series of work flow processes that help FIMA review WYO's claim processes. These modules, originally part of the Underwriting and Claims Operation Review Tool (UCORT), are now classified as workflow modules under DCMT. In March 2018, Pivot also built the Claims Appeals application which allows FIMA to track customers claims appeals. These modules were added to the Pivot security boundary:

- Submit for Rate
- Special Allocated Loss Adjustment Expenses 1
- Special Allocated Loss Adjustment Expenses 2
- Special Allocated Loss Adjustment Expenses 3
- Special Allocated Loss Adjustment Expenses 4
- Underwriting and Claims Operation Review
- Proof of Loss
- Litigation Tracker
- Claims Appeals

System Access

Users will be assigned specific roles and permissions to be able to perform only authorized

functions within DCMT. FEMA users will access DCMT from a web interface using their PIV credentials only. WYO and Vendors will access Appeals via the public-facing Pivot Portal web browser³ using username and password.

Individuals Impacted

- FEMA/FIMA Personnel and Contractors, specifically users within the Federal Insurance Directorate
- Policy Holders
- WYO Companies and their Flood Vendors
- FEMA Contractors with IT support responsibilities
- Third Parties supporting WYO companies in performing operational functions related to the management of flood policies and processing of accurate claims payment following a flood event. Third parties may include expert service providers (e.g., engineers), adjusters, or legal counsel

Sources of Information

DCMT collects information directly from:

- FEMA/FIMA staff;
- WYO companies;
- WYO Vendors
- Third parties supporting WYO companies in performing operational functions related to the management of flood policies and processing of accurate claims payment following a flood event. Third parties may include expert service providers (e.g., engineers), adjusters, or legal counsel.

Data Elements

- NFIP policy information about past, current, or potential flood insurance policyholders
- Policyholder and Policy Information
- Name
- Insured Property Address

³ WYOs and vendors will access these modules using the PIVOT dashboard (<https://pivot.fema.gov>).

- Home Mailing Address
- Claim specific information
- Policy Premium Amount
- Allocated Loss Adjustment Expense Amounts
- Actual Cash Values of Building and Contents
- Coverage Information
- Deductible Information
- Reason for Policy Closing Without Payment
- Applicable Policy Dates
- Fees and Numbers
- Program Types
- Replacement Cost Values
- Risk Rating Methods
- Rollover Indicators
- Previous Loss Amounts Paid
- Date of Loss
- Water Damage Information
- Insurance Coverage
- Deductible Amount
- Claim Payment Information
- Flood Risk Zone
- Participating Flood Community Name
- Building or Residence Location
- Construction Details
- Insurance Company Information
- WYO Company Name
- WYO Company Unique Identifier (assigned by FEMA)

- Adjuster Flood Certification Number (FCN)
- Adjuster Service company name
- Claims Location geo-codes
- Assessor Parcel number

DCMT also collects additional data about third parties, including expert service providers (e.g., engineers), adjusters, or legal counsel. The third-party information is collected to validate that the companies or individuals performing functions related to the processing of flood claims are certified or licensed when the services are provided to prevent fraud and abuse and adhere to requirements outlined in the NFIP Financial Control Plan. The application now collects the following data about third parties:

- Name of Entity
- Entity Address
- Entity License Number
- Entity Certification Number
- Invoice
- Report / Work Product
- Individual's name
- Flood Certification Number (FCN)
- City and State of Certification
- Litigation Information (e.g., summons/complaints, case plan/budget, initial case analysis, jurisdiction, case number, plaintiff information)

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