

Privacy Impact Assessment for the

Enterprise Coordination and Approval Processing System (eCAPS)

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Abstract

The U.S. Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA), Office of Response and Recovery (OR&R) operates the Enterprise Coordination and Approvals Processing System (eCAPS) application. Following a Presidentially-declared disaster, OR&R utilizes eCAPS, a FEMA intranet-based application, to collect, use, maintain, and disseminate personally identifiable information (PII) from federal and state points of contact (POCs) who request disaster support from FEMA. eCAPS tracks action requests, electronic coordination and approval of internal requisitions for services and supplies, and mission assignments. This Privacy Impact Assessment (PIA) is being conducted because eCAPS collects, uses, maintains, and disseminates PII from federal and state POCs.

Overview

FEMA OR&R operates the eCAPS application. The eCAPS system provides support to initiate, track, and expedite the process of providing direct aid and technical assistance to other federal agencies and states in response to a Presidentially-declared disaster. In order to meet FEMA's response obligations under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) and the Homeland Security Act of 2002 (Homeland Security Act), FEMA utilizes eCAPS to collect, use, maintain, and disseminate information from federal and state POCs who request disaster assistance. eCAPS facilitates the matching of these requests from government entities with FEMA's existing response capabilities and the response capabilities of the other federal agencies (OFAs) to which FEMA may delegate a mission assignment (MA).

Once the President of the United States makes a pre-incident emergency declaration or post-disaster declaration under the Stafford Act and the Homeland Security Act, federal entities, and most often, state governments, submit requests to FEMA for direct federal support and/or technical assistance. Whether in anticipation of a major catastrophic event or following a major disaster, the governor of a state declares a state of emergency, and the state follows with a request for federal assistance. State POCs may initiate these requests in several different ways, including by phone and paper form. When FEMA receives an "Action Request Form" (ARF, or FEMA Form (FF) 010-0-7), filled out and signed by the State Approving Official (SAO), the approval process begins. For example, the State Coordinating Officer (SCO) or other POC completes an ARF, obtains the signature of the SAO, and transmits FF 010-0-7, by hand or electronically, to the FEMA Action Tracker or Mission Assignment Manager (MAM), who delivers the completed ARF to the FEMA Operations Section Chief (OSC) for approval. If there are any discrepancies with the information on the ARF, the form is returned to the POC by hand or is verified through an informal phone call by the Action Tracker or MAM. Alternatively, the governor, emergency manager, or other state POC may contact a FEMA official to request



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support, and the MAM follows up by conducting a phone interview with the state POC. During the call, the MAM provides the requisite privacy notice and collects the required information such as name, contact information, and a description of the requested assistance, and then forwards the information to a FEMA Action Tracker. In both instances, the OSC verifies and validates the request and considers whether or not it: 1) is eligible for federal funding; 2) can be supported by the state; 3) constitutes restorative or temporary work; and/or 4) is within the statutory authority of another federal agency. If any questions should arise, the OSC contacts the state POC for additional information.

If one or more other federal agencies are needed to provide or supplement FEMA support, the OSC coordinates with the specified Emergency Support Function (ESF)/Other Federal Agency (OFA) POC(s) to ascertain the abilities of the agency(ies) to meet the request. If the other federal agency(ies) have the capabilities, the OSC assigns a project manager to the Mission Assignment (MA), and the ESF/OFA designates an action officer. Then the FEMA Project Manager and OFA Action Officer jointly develop a Statement of Work (SOW). If the OSC approves the action request and SOW, the OSC hand-delivers the approved, signed FF 010-0-7 (ARF) to the MAM, who in turn opens the Intranet-based eCAPS system. The Intranet is behind the FEMA firewall, so eCAPS is not accessible to those outside of FEMA. After opening eCAPS, the MAM is given the choice to create either a new FEMA Form 010-0-8 "Mission Assignment Form" or a new FEMA Form 146-0-2 "Requisition and Commitment for Service and Supplies," (formerly FEMA Form 40-1).

If the MAM initiates an MA, he or she manually enters the information directly from FF 010-0-7 (ARF) into the appropriate fields of FF 010-0-8 (MA) within eCAPS. In addition, if the OSC determines that additional funds are required for FEMA to fulfill the action request, and/or if a contract is necessary to fulfill a portion of the request, then either an National Response Coordination Center (NRCC) Ordering Specialist or a Project Officer affiliated with the requested resource uses the same eCAPS login process as the MAM but instead selects the option to create a new FF 146-0-2 (procurement request). This form documents the resource requirements, timelines, coordination, and approvals that are associated with a particular vendor. At this point, the NRCC Ordering Specialist or Project Officer manually enters the requested information from the completed, approved FF 010-0-7 (ARF) into FF 146-0-2 within eCAPS.

Once the information is entered into eCAPS, the request is routed for electronic approval by the FEMA MAM, project manager, and Federal Approving Official (FAO). Subsequently, the FEMA comptroller reviews the MA in eCAPS and obligates the funds via a system external to eCAPS. Finally, the FEMA Action Tracker or MAM monitors the status of the MA in eCAPS and delivers copies of FF 010-0-8 (MA) signed by the comptroller to the ESF/OFA Action Officer, the FEMA Project Manager, and FEMA Acquisitions for filing and billing accountability. The information in eCAPS is maintained for one year after the final audit and



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after applicant appeals are resolved, and is then retired to the Federal Records Center (FRC) for six years and three months.

ECAPS information may, on occasion, be shared with other federal agencies that have a role in providing support to meet the requirements of the state's action request. In addition, in rare circumstances, FEMA may share Action Request status information with SCOs through eCAPS at Joint Field Offices (JFOs). In these cases, the information in eCAPS is retrieved by a disaster ID number or state name but is not retrieved or retrievable by the PII of any member of the public (state official or OFA employee).

The primary privacy risks relative to eCAPS are the risk of inaccurate information being entered into eCAPS, because of the manual data entry that occurs during the processing of all three forms, and the risk that the information may be retained for a longer period than necessary. To mitigate these privacy risks and enhance privacy protections overall, FEMA employs a variety of measures, including allowing state POCs to correct inaccurate information by telephone or email, and using training courses and standard operating procedures to document eCAPS protocols and establish guidelines for how FEMA employees use eCAPS.

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?

FEMA is delegated with assisting and supplementing federal, state, and local efforts and capabilities in times of emergencies and disasters. FEMA responds to requests for emergency and/or disaster declarations from states that have been or may be affected by a natural catastrophe, or regardless of cause, any fire, flood, or explosion in any part of the United States. In order to carry out its mission and responsibilities, FEMA needs information from states in order to expediently process and analyze the request and to properly notify the State making of its decision as to whether to declare an emergency and/or disaster. Below are the various authorities that give FEMA this power:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288 (as amended at 42 U.S.C. § 5121-5122, § 5170-5173, § 5191-5192);
- Homeland Security Act of 2002, Pub. L. No. 107-296 (codified as amended at 6 U.S.C. § 317);
- Emergency Management and Assistance, 44 C.F.R. § 206.31-206.66 (2009);
- Executive Order 12127;
- Executive Order 12148;



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- Executive Order 12656;
- Office of Management and Budget Information Collection Request (OMB ICR) No. 1660-0047;
- Homeland Security Presidential Directive (HSPD) 5, Domestic Incident Management (February 28, 2003);
- FEMA Interim CFO Directive 2600-008 Managing Open Obligations (22 June 2009); and
- FEMA Interim Directive 2600-016 Disaster Relief Fund (DRF) Pre-Disaster Declaration (Surge) Funding (29 September 2009).

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

The information in eCAPS is retrieved by a specific disaster number or state name. The information in eCAPS is neither retrieved nor retrievable by any PII, and therefore the information is not part of a system of records.

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

An Information System Security Officer (ISSO) has been assigned and is currently recertifying and reaccrediting the system. The ISSO expects eCAPS will receive its authority to operate (ATO) by May 2012.

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

FEMA retains the information in eCAPS pursuant to NARA Authority N1-311-89-5, Item 1. Under this rule, the records are collected and retained for one year after the final audit and after applicant appeals are resolved, and then are retired to the FRC for six years and three months.

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.

Information collected under eCAPS is covered under the PRA. OMB ICR No. 1660-0047 (expires March 31, 2014) includes FEMA Form (FF) 010-0-7 "Action Request Form," and FEMA Form (FF) 010-0-8 "Mission Assignment."



Section 2.0 Characterization of the Information

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

From State/Local/Tribal Agency or Other Federal Agency POCs:

•	Name of Initiator/Requestor	(FF 010-0-7/FF 010-0-8)
•	Title of Requestor	(FF 010-0-7)
•	24 Hour Phone Number of Requestor	(FF 010-0-7/FF 010-0-8)
•	Email Address of Requestor	(FF 010-0-7/FF 010-0-8)
•	Site POC Name	(FF 010-0-7/FF 010-0-8)
•	24 Hour Phone of Site POC	(FF 010-0-7/FF 010-0-8)
•	Email Address of Site POC	(FF 010-0-8)
•	Name of ESF/OFA Action Officer (AO)	(FF 010-0-7/FF 010-0-8)
•	24 Hour Phone Number of ESF/OFA AO	(FF 010-0-7/FF 010-0-8)
•	Email Address of ESF/OFA AO	(FF 010-0-8)
•	Fax Number of ESF/OFA AO	(FF 010-0-7)
•	State Approving Official (SAO) Signature	(FF 010-0-7/FF 010-0-8)
•	Recipient Name & Organization	(FF 010-0-7)
•	Requestor's Organization	(FF 010-0-7)
•	Requestor's Fax Number	(FF 010-0-7)
•	Date of Request	(FF 010-0-8)
•	Assistance Requested	(FF 010-0-7/FF 010-0-8)
•	Quantity of Assistance	(FF 010-0-7)
•	Priority	(FF 010-0-7/FF 010-0-8)
•	Date and Time Needed	(FF 010-0-7/FF 010-0-8)
•	Delivery Site Location	(FF 010-0-7/FF 010-0-8)
•	Date Site POC was Designated	(FF 010-0-8)
•	Fax Number of Site POC	(FF 010-0-7)
•	Date and Time Signed by SAO	(FF 010-0-7/FF 010-0-8)
•	State of Recipient	(FF 010-0-7/FF 010-0-8)
•	Date/Time Received	(FF 010-0-7/FF 010-0-8)

From FEMA Employees or Contractors:

•	Name of OPS Reviewer	(FF 010-0-7)
•	Name of LOG Reviewer	(FF 010-0-7)
•	Names of Other Coordinators	(FF 010-0-7)
•	Name of ESF/OFA Action Officer (AO)	(FF 010-0-7/FF 010-0-8)
•	24 Hour Phone Number of ESF/OFA AO	(FF 010-0-7/FF 010-0-8)
•	Email Address of ESF/OFA AO	(FF 010-0-8)
•	Names of FEMA Project Manager (PM)	(FF 010-0-7)
•	24 Hour Phone Number of FEMA PM	(FF 010-0-7)





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•	Signature of FEMA PM/Branch Director	(FF 010-0-8)	
•	Name of MA Manager (Preparer)	(FF 010-0-8)	
•	Name of Agency(ies) Assigned	(FF 010-0-8)	
•	Signature of Comptroller/Funds Control POC	(FF 010-0-8)	
•	Signature of Federal Approving Official	(FF 010-0-8)	
•	Recipient's Name, Office Symbol, Bldg., Room# (FF 146-0-2)		
•	Suggested Sources (Name, Address, Contact, Telephone #) (FF 146-0-2)		
•	Signature of COTR	(FF 146-0-2)	
•	Signature of Intermediate Approval	(FF 146-0-2)	
•	Signature of Program Head	(FF 146-0-2)	
•	Signature of Other Coordination	(FF 146-0-2)	
•	Personal Property/Mgmt Services Section Signature (supplies/equipment) (FF 146-0-2)		
•	Personal Property/Management Services Section POC (FF 146-0-2)		
•	Signature of Certifying Officer	(FF 146-0-2)	
•	Assignment: Name of Contracting/Assistance Officer (FF 146-0-2)		
•	Phone Number of Contracting/Assistance Officer (FF 146-0-2)		
•	Name of Contract Specialist	(FF 146-0-2)	
•	Phone Number of Contract Specialist	(FF 146-0-2)	
•	Fax Number of FEMA PM	(FF 010-0-7)	
•	Fax Number of ESF/OFA AO	(FF 010-0-7)	
•	Sources Used to Meet the Request	(FF 010-0-7)	
•	Statement of Work	(FF 010-0-7/FF 010-0-8)	
•	Actions Taken	(FF 010-0-7)	
•	Initial Federal Coordination	(FF 010-0-8)	
•	Reasons for Actions Taken	(FF 010-0-7)	
•	Date/Time of Actions	(FF 010-0-8)	
•	Requestors were Notified of Actions Taken?	(FF 010-0-7)	
•	Types of Mission Assignments (MAs)	(FF 010-0-8)	
•	MA Date	(FF 010-0-8)	
•	MA Number	(FF 010-0-8)	
•	Assigned to ESF/OFA or Other?	(FF 010-0-7)	
•	New MA or Amendment to MA?	(FF 010-0-8)	
•	Amendment Number	(FF 010-0-8)	
•	Estimated Start Date	(FF 010-0-8)	
•	Estimated Completion Date	(FF 010-0-7/FF 010-0-8)	
•	Estimated Cost	(FF 010-0-7/FF 010-0-8)	
•	State Cost Share Percentage	(FF 010-0-8)	
•	State Cost Share Amount	(FF 010-0-8)	
•	Fund Citation	(FF 010-0-8)	
•	Amount This Action	(FF 010-0-8)	
•	Cumulative Amount (amendment)	(FF 010-0-8)	

(FF 010-0-8)

Initials (for Cumulative Amount)



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•	Date/Time Obligated	(FF 010-0-8)
•	eCAPS/NEMIS Task ID	(FF 010-0-7)
•	State NEMIS ID	(FF 010-0-8)
•	Action Request Number	(FF 010-0-7)
•	Internal Control Number	(FF 010-0-8)
•	Program Code/Event Number	(FF 010-0-7/FF 010-0-8)
•	Requisitioning Program Office (Symbol/Bldg/Room #) (FF 146-0-2)	
•	Contracting Officers' Technical Representative (COTR) (FF 146-0-2)	
•	Date of Request	(FF 146-0-2)
•	Estimated Period of Performance	(FF 146-0-2)
•	Total Estimated Cost	(FF 146-0-2)
•	Project Title/Description of Supplies, Equipment and/or Services (FF 146-0-2)	
•	List of Attachments	(FF 146-0-2)
•	Justification/Comments	(FF 146-0-2)
•	Available and Reserved Amount	(FF 146-0-2)
•	Date Procurement Request (PR) Receive	ed (FF 146-0-2)
•	Date PR Received	(FF 146-0-2)
•	Attachments to forms	(FF 010-0-7/FF 010-0-8/FF 146-0-2)

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

The sources of the information in eCAPS are FEMA employees and contractors, State Coordinating Officers, and federal employees of agencies outside of DHS requesting assistance. The information may be collected via paper form, verbally via telephone or in person, or electronically via direct entry into eCAPS.

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

eCAPS does not use information from commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

FEMA collects information directly from the state POC, either from the ARF or via a phone interview. Once FEMA staff either receive the completed ARF or record the data in an ARF, they verify it with the state POC via email, phone or in person before approving it for processing. The data is read off of the ARFs and then manually entered into eCAPS by FEMA staff.



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2.5 <u>Privacy Impact Analysis</u>: Related to Characterization of the Information

<u>Privacy Risk</u>: A privacy risk associated with the system is that eCAPS may collect erroneous or inaccurate information.

<u>Mitigation</u>: To mitigate this risk, FEMA collects the information in eCAPS directly from the federal and state points of contact (POCs) requesting FEMA assistance. In the cases where FEMA personnel manually enter data into the Action Request Form on behalf of the POCs, FEMA mitigates this risk by verifying the data with the POCs before it is entered into eCAPS. In addition, FEMA provides annual training, online training and policy to educate eCAPS users regarding the importance of and ways to ensure accuracy of the data.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

FEMA collects the information in eCAPS through paper forms, FEMA intranet interface, telephone conversations, and via email. The information is used to initiate, track, and expedite the process of providing aid to other federal agencies, states and communities in response to a pre-incident emergency declaration or post-disaster declaration under the Stafford Act. The information assists FEMA in matching and assigning the requests for assistance it receives from federal or state government entities with FEMA's existing response capability and the capabilities of other federal agencies, which facilitates the response element of FEMA's mission under the Stafford Act.

More specifically, the eCAPS application collects names, titles, signatures, email addresses, and phone numbers of state POCs requesting federal assistance and other individuals involved in the process of responding to an Action Request to establish accountability for assistance requests and mission assignments, and to enhance communication among stakeholders. FEMA also uses email and telephone conversations as tools for accomplishing the redress and correction of erroneous information in eCAPS.

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.

eCAPS does not conduct electronic searches, queries, or analyses in an electronic database to discover or located a predictive pattern or an anomaly.



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

No other DHS components have an assigned role or responsibility in eCAPS.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: A privacy risk associated with eCAPS includes FEMA using information for purposes other than that for which it was collected.

<u>Mitigation</u>: FEMA limits the collection of information to that which is relevant to facilitate the review of action requests and establish the accountability and communication necessary to fulfill those requests through mission assignments. Access to eCAPS is limited via the FEMA intranet to only those with a "need to know" the information in the course of their official duties. FEMA also limits the sharing of the information within eCAPS to the rare instances when state or federal points of contact may access eCAPS while present in a Joint Field Office (JFO).

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.

FEMA leverages several media to ensure that ample notice of its information collection for eCAPS has been provided to the respective federal and state POCs whose information is collected and maintained therein. First, the respective forms, noted above in section 1.5, have Privacy Notices (attached at Appendix A) prominently displayed. Secondly, FEMA staff, most often a Mission Assignment Manager, provide a verbal privacy notice (attached at Appendix B) when conducting a phone interview to assist the state or federal POC in completing the Action Request Form (FF 010-0-7). Lastly, this PIA also provides notice of the collection of information for eCAPS.

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

First, there is only one use of the information in eCAPS, as described in section 3.1 above. Secondly, FEMA voluntarily collects the information requested in its "Action Request Form (ARF)" (FF 010-0-7) and "Mission Assignment Form" (FF 010-0-8). Federal and state POCs who are requesting FEMA assistance, but who may not be able to fill out the ARF may also provide this information directly to a FEMA Mission Assignment Manager, who will then complete the ARF on behalf of the POC. Federal and state POCs can opt out and choose not to



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submit the requested information, but to do so means that FEMA will not be able to provide assistance.

4.3 **Privacy Impact Analysis: Related to Notice**

Privacy Risk: A privacy risk associated with this system is that the individual federal and state POCs will not receive notice at the time their information is collected.

<u>Mitigation</u>: This privacy risk is mitigated because FEMA provides a Privacy Notice (attached at Appendix A) to federal and state POCs either on the form itself, or verbally (attached at Appendix B) if a FEMA MAM is assisting the POC.

Section 5.0 Data Retention by the project

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

Pursuant to NARA Authority N1-311-89-5, Item 1, FEMA collects and stores the information in eCAPS for one year after the final audit for a specific disaster and after applicant appeals are resolved; the information is then retired to the FRC for six years and three months.

5.2 Privacy Impact Analysis: Related to Retention

<u>Privacy Risk</u>: A privacy risk associated with this system is that eCAPS will retain information longer than necessary.

<u>Mitigation</u>: This privacy risk is mitigated because FEMA minimizes the time it keeps the data, in line with the mission of eCAPS and with an allowance for appeals. In addition, FEMA leverages eCAPS training and documentation, such as standard operating procedures, to inform FEMA users of proper record retention standards.

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.

Yes, however, FEMA limits the information in eCAPS that is shared outside of DHS as part of the normal process of documenting federal and state action requests and matching them to corresponding mission assignments. FEMA shares the information in its MA forms with the state POCs who are responsible for approving the forms and possibly other federal agency (OFA) POCs outside of DHS, if such agencies will be tasked to supply resources pursuant to the request. In addition, federal and state POCs may obtain access to eCAPS while they are present at a FEMA JFO. In this rare circumstance, federal and state POCs only have access to the status



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of their respective action request (the ARF) via eCAPS. State POCs may only view information in eCAPS about those disasters relevant to their states and, otherwise, may not search eCAPS.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

While the information in eCAPS is not part of a system of records, it is only shared externally to achieve the purposes of the action request and mission assignment functions, which are an integral part of FEMA's disaster response mission. The federal and state POCs, who may access the status of their action request in eCAPS while present at a FEMA JFO, may only retrieve this information by the name of their state and/or the FEMA disaster number. The data in eCAPS is neither retrieved nor retrievable by any PII.

6.3 Does the project place limitations on re-dissemination?

Yes. In very limited situations, state or OFA POCs may have read-only access to eCAPS while at a JFO, allowing them to view only the status of their respective action requests.

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

Though not a part of a system of records under the Privacy Act, requests for information within eCAPS may be made to the FEMA Disclosure Office which maintains the accounting of what records are disclosed and to whom.

6.5 Privacy Impact Analysis: Related to Information Sharing

<u>Privacy Risk</u>: A privacy risk associated with this system is that the information in eCAPS could be erroneously disclosed.

Mitigation: This privacy risk is mitigated because FEMA strictly limits the sharing of information in eCAPS to only those individuals who are involved in the process of requesting FEMA assistance or assigning a response to such a request. Furthermore, within the scope of information sharing that eCAPS allows, the sharing is further restricted, requiring a "need to know" for the specific data. For example, as noted above in section 6.2, federal and state POCs are only allowed to access the status of their respective action requests in eCAPS, and only if they have access to eCAPS while present at a FEMA JFO, and even under these limited circumstances, the status information includes only a notation of whether the action request was granted, denied, or is pending.



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Section 7.0 Redress

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

Generally, the federal and state POCs who require access to their information in eCAPS may submit a Freedom of Information Act (FOIA) request to the FEMA Disclosure Branch. The Privacy Act does not apply to the information within eCAPS as it is neither retrieved nor retrievable by a unique identifier, and thus is not part of a system of records.

More specifically, FEMA allows federal and state POCs to access to their information via telephone and email.

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

To correct inaccurate or erroneous information in eCAPS, federal and state POCs may contact directly the FEMA Mission Assignment Manager (MAM) assigned to their respective request. MAMs are available to federal and state POCs via telephone, email, and perhaps even in person, if the POC and the MAM are both present at a FEMA JFO.

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

The process of documenting federal and state action requests and providing mission assignments in response is very personal and "hands on," which affords FEMA the opportunity to provide eCAPS redress, and notice of redress, directly to the federal and state POCs involved in the process. This notice may be provided during the initial interview with the FEMA MAM who is assisting the POC with the ARF, and then again, notice may be provided by FEMA Action Officers who may subsequently tell the POCs to contact their MAMs to correct any erroneous information. The MAMs, in turn, may provide the POCs with the process for correcting information either verbally via telephone or in person, or via email.

7.4 <u>Privacy Impact Analysis</u>: Related to Redress

<u>Privacy Risk</u>: A privacy risk associated with this system is that the federal and state POCs whose information is in eCAPS will be unable to obtain redress.

<u>Mitigation</u>: This risk is mitigated because FEMA provides notice of its redress process to federal and state POCs through different media. First, as noted above in section 7.3, there FEMA has multiple opportunities to provide notice of redress to the POCs, first through the initial process of MAMs assisting the POCs with their respective ARFs, and secondly, FEMA



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Action Officers may subsequently advise the POCs to contact their respective MAMs for redress issues. Additionally, this PIA also provides notice of FEMA's redress process for eCAPS. The high level of coordination between FEMA and the POCs affords an opportunity to achieve redress. FEMA MAMs verbally verify information prior to entering it into eCAPS, then during the approval process for an ARF, the FEMA OSC collaborates with the SCO, giving visibility into the data as it exists in the ARF. Importantly, the SCO may also request a copy of the obligated (approved) MA as it appears in eCAPS. Any errors that might have been made would be revealed and can be fixed in real-time by FEMA's MAM going into eCAPS and correcting the data.

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?

FEMA ensures that the practices stated in this PIA are followed by leveraging standard operating procedures, which are updated annually; an annual training conference for eCAPS users including FEMA staff and federal and state POCs; year-around online training on assisting with the disaster declarations process, which includes how to complete ARFs; and FEMA Chief Financial Officer (CFO) audits, which are conducted annually, if not more frequently. In addition, relevant meetings, record retention schedules, and security measures promote adherence to the practices stated in this PIA.

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

All FEMA eCAPS users are required to successfully meet annual privacy awareness and information security training requirements according the FEMA training guidelines. In addition, the FEMA Action Tracker staff, who manually enter ARF data into eCAPS, receive program-specific eCAPS training.

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

FEMA limits federal and state POC access to eCAPS to only those individual POCs who are present at a FEMA JFO and wish to access the status of their own action requests for the specific event for which the POC is present at the JFO. The OSC approves state and JFO requests for access to eCAPS. Such users must provide justification for access. Additionally, the check-in form for laptops and other IT equipment at JFOs require a "need to know" for



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access to specified IT systems and data. Supervisors must approve eCAPS access requests for local FEMA employees.

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?

Currently, eCAPS does not require information sharing agreements or MOUs; however, the project has a process to review such agreements as necessary. This process involves program stakeholders, ISSOs, the Office of Chief Counsel, and the FEMA Privacy Office. Similarly, eCAPS will leverage its stakeholders in the process of reviewing and approving any new uses for the project. If eCAPS contemplates new uses for the system or its information, FEMA will update the required privacy compliance documentation.

Responsible Officials

Eric M. Leckey Privacy Officer Federal Emergency Management Agency U.S. Department of Homeland Security

Approval Signature

Original signed copy on file with the DHS Privacy Office

Mary Ellen Callahan Chief Privacy Officer Department of Homeland Security



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APPENDIX A: PRIVACY NOTICE FOR FF 010-0-7 AND FF 10-0-8

FEMA is authorized to collect this information under the Stafford Act, Post-Katrina Emergency Management Reform Act (PKEMRA) of 2006, and other authorities. FEMA is collecting this information to define what disaster assistance it will provide in response to a state or federal agency's request for FEMA assistance following a Presidentially-declared disaster. FEMA will use the information to define the work to be performed, document the start and end dates of the assignment, provide a cost estimate for the work, and to obligate the funds that are requested from another federal agency to fulfill a mission task. Furnishing this information is voluntary; however, failure to furnish the requested information may delay or prevent DHS/FEMA or other federal agencies from providing the requested support.



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APPENDIX B: PRIVACY NOTICE PROVIDED VIA PHONE

"We are required by law to provide the following Privacy Notice to you. The information that you give the Department of Homeland Security, Federal Emergency Management Agency, is collected under the Post-Katrina Emergency Management Reform Act (PKEMRA) of 2006 and other authorities. It will be used to determine the disaster assistance that is needed from DHS/FEMA and other federal agencies. The information will also be used to define the work to be performed, the timeframe, and estimated costs of fulfilling the request. DHS/FEMA may share this information outside the agency upon written request, by agreement, or as required by law. Furnishing the requested information is voluntary, but failure to do so may delay or prevent DHS/FEMA and other agencies from providing the needed support."