



Privacy Impact Assessment
for the

Deployment Qualifications Program

DHS/FEMA/PIA-033

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Abstract

The Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Office of Response and Recovery, Response Directorate, Incident Workforce Management Office (IWMO) Deployment Unit maintains the FEMA Qualification System (FQS), a set of performance measures and criteria used to establish and evaluate disaster response and recovery personnel competency. To assign and qualify deployment personnel, FEMA leverages the FQS doctrine with the Automated Deployment Database (ADD), Learning Management System (LMS), Enterprise Data Warehouse/Operational Data Store (EDW/ODS), and the Department of Interior (DOI), Bureau of Land Management (BLM), Incident Qualifications and Certification System (IQCS), to track job titles, certifications, and training of participants in FEMA's deployment programs. FEMA is conducting this Privacy Impact Assessment (PIA) because, in conjunction with FQS, FEMA collects, uses, maintains, retrieves, and disseminates personally identifiable information (PII) through ADD and other systems, and shares it with DOI/BLM for the purpose of qualifying disaster response and recovery personnel for deployment.

Overview

To meet the challenges of its long-standing all-hazards response mission under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), and to deliver coordinated, successful response operations, the IWMO Deployment Unit has established several deployment programs.¹ FEMA has established the FEMA Qualifications System (FQS) to support these deployment programs and to meet the requirement of the Post Katrina Emergency Management Reform Act of 2006 (PKEMRA) that FEMA set qualification standards for all emergency managers, including the FEMA disaster workforce. FQS is a system of doctrine² that sets disaster response and recovery personnel to consistent expectations of workforce competency and criteria. In turn, this will ensure and enable these professionals to perform the critical actions needed to help individuals and communities respond to, recover from, and mitigate disasters. FQS establishes a process for measuring employee performance, qualifications, training, and certifications against a qualifications standard (i.e., a position task book or PTB) for incident management and incident support positions. Each position title qualification in FQS consists of the documented performance of required knowledge, skills, and abilities that may be earned through a variety of means, such as: training, external certifications, deployment experiences, and simulations or exercises. To be "qualified" for any specific job title in FQS, an individual must complete all qualifying experience required for the position, complete required training, demonstrate successful

¹ FEMA's deployment programs include FEMA Permanent Fulltime Employees (PFT), Temporary Fulltime Employee (TFT), Cadre of Response/Recovery Employees (CORE), FEMA Reservists, the FEMA Corps, and DHS Surge Capacity Force (SCF) programs, which are all discussed in further detail in the FEMA Deployment Programs PIA. However, neither DHS SCF volunteers nor the FEMA Corps members are included in the FQS program; therefore, their data is not shared with IQCS. For additional information about FEMA's Deployment Programs, please see DHS/FEMA/PIA-032 – FEMA Deployment Programs

² The term 'doctrine' refers to documentation and material that guides FEMA's deployment operations. Doctrine is implemented to promote FEMA's efforts to achieve its mission as an agency.



performance of the required activities, and be officially designated as “qualified” through management review of an individual’s qualification records and history.

ADD is FEMA’s official deployment system used to contact, request deployment, deploy, and monitor disaster response and recovery personnel responding to incidents. Through ADD, FEMA identifies and documents disaster response and recovery personnel assignments and tracks availability, work assignment, and duty station. To qualify disaster response and recovery personnel who are assigned FQS position titles, FEMA collects information from FEMA Permanent Full Time Employees (PFT), Temporary Full Time Employees (TFT), Cadre of Response Employees (CORE), and Reservists and stores the information in the ADD system.³ Once FEMA’s deployment qualifications program is fully implemented, it will leverage information from the FEMA Employee Knowledge Center (FEKC),⁴ EDW/ODS,⁵ and the National Emergency Training Center (NETC) Database,⁶ to match training and qualifications records of individuals with FQS position titles in DOI/BLM’s IQCS⁷, a system originally developed by BLM to support the wildland fire response qualifications process. Through an interagency agreement between FEMA and BLM, BLM has created a FEMA-specific instance of IQCS that supports FEMA’s business rules under FQS.

Qualification of Disaster Response and Recovery Personnel

The respective deployment programs provide Privacy Act Statements and collect the necessary information from disaster response and recovery professionals. Furthermore, FEMA has provided notice of its high-profile, agency-wide deployment qualifications program through several media, including a memorandum to all FEMA employees from the Deputy Administrator and multiple other memoranda, an FQS tri-fold brochure, and the FEMA Qualification System Guide, among other media.

Once the respective deployment program provides the Privacy Act Statement, the IWMO Deployment Unit enters the data into ADD. An individual whose information appears in ADD may update his or her information throughout the deployment experience by providing updated information regarding availability, deployment location, and/or other elements,⁸ through the Availability Reporting System (ARS) toll-free line.

For each individual’s record in ADD, FEMA assigns a personal identification number (PID) number, and with it, stores the name, social security number (SSN) (for FEMA and DHS component employees only), date of birth (DOB), position title(s), and disaster assignment experience that supports

³ ADD is discussed more thoroughly in the Deployment Programs PIA.

⁴ See DHS/FEMA/PIA-022 – Student Training/Exercise Application and Registration Records, available at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_starrs.pdf.

⁵ See DHS/FEMA/PIA-026 – Operational Data Store (ODS) and Enterprise Data Warehouse (EDW), available at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_ods_edw_20120629.pdf.

⁶ See DHS/FEMA/PIA-022 – Student Training/Exercise Application and Registration Records, available at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_starrs.pdf.

⁷ See DOI/BLM/PIA – Incident Qualifications and Certifications System, available at http://www.doi.gov/ocio/information_assurance/privacy/upload/PublicPIA_BLM_IQCS_02_08.pdf.

⁸ For more information regarding the ‘typical transaction’ in ADD, see the FEMA Deployment Programs PIA.



position qualification and currency, along with other specified information, as noted in section 2.1. For FEMA employees, who are subject to being qualified for a deployment-related position through FQS, FEMA uses the PID and the FQS position title to query the records in ADD. FEMA encrypts the results of these queries, stores them in EDW/ODS, secures them with a password, then transfers them via email to DOI/BLM to be uploaded into DOI/BLM's IQCS, where each individual's record will be matched with his or her respective FQS qualifications record. The PIDs created by ADD will also serve as the DOI/BLM's IQCS ID numbers. All transfers from FEMA to DOI/BLM submitted after the initial setup of FEMA's environment in DOI/BLM's IQCS will use the PIDs, individual names, and organization codes. As part of the initial setup, FEMA transferred to DOI/BLM's IQCS information on its PFT, TFT, CORE, and Reservist employees with assigned positions subject to FQS conditions.

Once FEMA transfers the updated records from EDW/ODS to BLM via encrypted email, DOI/BLM's IQCS applies the business rules for FQS to the individual records to determine the level of qualification for each position. Through FQS, FEMA assigns one of two statuses for any given position: 1) trainee; or 2) qualified. As individuals receive additional training and deployment experience, DOI/BLM's IQCS processes their records and notes their status achievement relative to their position title. For each individual, DOI/BLM's IQCS stores the full name, organization code, FQS position title(s), qualification status per position, the status of each PTB, and training information related to FQS positions, specialties, and certifications. DOI/BLM's IQCS also has robust reporting capabilities to manage individual and workforce position qualifications. DOI/BLM's IQCS queries the FEMA IQCS instance at regularly scheduled intervals to retrieve the current responder PIDs, job titles, and qualification status records and transfers those records to ADD that have been marked for such a transfer via a "Send to ADD" checkbox field within the qualifications record.⁹ This query returns the current, active FQS position titles, along with their respective PIDs, which are returned via secure, encrypted email to a FEMA IQCS Database Analyst, who manually matches and updates the records in ADD. Thus ADD retains only the current, active job title(s) for each deployable individual. Although this import of FEMA information into DOI/BLM's IQCS includes PIDs, it does not include SSNs or DOBs.

This manual process will be followed throughout the Initial Operations Phase, but by the fourth quarter of FY 2013, FEMA will formalize a memorandum of understanding (MOU) and interagency agreement with DOI/BLM to account for the future transfers of data between EDW/ODS and DOI/BLM's IQCS during the Final Operating Phase and beyond. At that point, FEMA will establish virtual servers at both agencies, which will allow FEMA to manually and securely send and obtain data between the two agencies. Thus, rather than a direct transfer of data queried from EDW/ODS to DOI/BLM's IQCS via encrypted email, EDW/ODS will directly extract the data from ADD for storage. Likewise, EDW/ODS will extract FEKC data for storage. FEMA will continue to use the PID to extract ADD deployment records from ODS and will use the SSN to extract the FEKC training records, which FEMA will append to the respective deployment records and remove the SSN. FEMA will then store all the records by PID in EDW/ODS and will securely transfer the data to DOI/BLM in order to upload it into DOI/BLM's IQCS and match it with the individual's FQS qualifications record.

⁹ The information that FEMA sends to DOI/BLM is stored in IQCS, but kept separate and apart from data within IQCS. The term "FEMA IQCS instance" is used to indicate the unique and separate location of FEMA's records within the IQCS environment.



In the future, FEMA will enter course completion records housed in the NETC Database from courses provided at the Emergency Management Institute (EMI), the Center for Domestic Preparedness, Regions, Joint Field Offices, Disaster Recovery Centers, or directly to DOI/BLM's IQCS in one of the following ways: 1) FEMA will use the DOI/BLM's IQCS Enterprise Learning Module for scheduling courses and developing rosters, which enables disaster response and recovery personnel records to be updated directly by the module upon course completion; or 2) disaster response and recovery personnel will submit certificates of course completion, and either a national program manager or the IWMO Deployment Unit will manually enter the information into the responder's record.

The primary privacy risk related to FEMA's deployment qualifications program is the risk of an unauthorized or inadvertent disclosure of information from either ADD or DOI/BLM's IQCS. To mitigate this risk, FEMA employs a variety of measures. First, FEMA requires training courses of all individuals with access to ADD to ensure the proper use and handling of information. FEMA also uses standard operating procedures (SOP) to document ADD protocols and establish guidelines for how FEMA employees use ADD. In addition, the pending MOU between FEMA and DOI/BLM prohibits participating agencies from further disclosing information to any non-participating entity without written consent of the participating agency providing the information or disclosures required by federal statute. Furthermore, DOI/BLM trains its DOI/BLM's IQCS staff on the proper use and handling of information. FEMA and DOI/BLM both engage in regular meetings wherein any issues or concerns about the handling of information may be addressed. FEMA only shares information in ADD with DOI/BLM pursuant to the MOU and consistent with the appropriate System of Records Notice (SORN) described below in Section 1.2. DOI/BLM's IQCS will store active records for the duration of the MOU between FEMA and DOI/BLM. In the event that a disaster response or recovery personnel record is devoid of activity for four years, that record will become "inactive." If the record remains in inactive status for a year, DOI/BLM's IQCS will archive the record and return it to FEMA.

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?

- Sections 303, 306, 403, 502, and 621 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended, Pub. L. No. 93-288, and codified at 42 U.S.C. §§ 5144, 5149, 5170, and 5197;
- Sections 503, 504, and 510 of the Homeland Security Act of 2002, codified at 6 U.S.C. §§ 313, 314, 320, and 711;
- Exec. Order No. 13478, "Amendments to Exec. Order No. 9397 Relating to Federal Agency Use of Social Security Numbers;"
- Exec. Order No. 9397, "Numbering System for Federal Accounts Relating to Individual Persons;"
- 5 U.S.C. § 1302, "Government Organization and Employee Regulations;"
- 31 U.S.C. § 7701(c), "General Assistance Administration;"
- 44 C.F.R. §§ 206.5, 206.7-206.8, 206.43; and,



- Homeland Security Presidential Directive 5, “Management of Domestic Incidents.”

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

The information associated with FEMA’s deployment qualification program is covered by the following SORNs:

- DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008 (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>); and,
- DHS/ALL-021 Department of Homeland Security Contractors and Consultants, 73 FR 63179, October 23, 2008 (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-23/html/E8-25205.htm>).

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

ADD: FEMA completed a System Security Plan (SSP) for ADD in January 2006, and the Certification & Accreditation was completed in May 2013.

FEKC: FEMA completed a SSP for FEKC in January 2011, and granted an Authority to Operate (ATO) on January 29, 2011.

ODS: FEMA completed a SSP for ODS in August 2011, and granted an ATO on August 31, 2011.

DOI/BLM’s IQCS: DOI/BLM completed a SSP for IQCS in June 2012, and granted an ATO on June 13, 2012.

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

FEMA’s Records Management Division (RMD) is collaborating with partner agencies and NARA to establish an approved retention and disposal schedule for its deployment qualification records and deployment records that is consistent with the above referenced SORNs and the mission-driven needs of the agency. In the meantime, data will be retained and once NARA has approved this retention and disposal schedule, this PIA will be updated and all data will be retained and disposed of in accordance with the NARA approved schedule, including retroactively.



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 information collected as part of FEMA's deployment qualifications program is exempt from the PRA under 44 U.S.C. § 3502(3)(A) and Presidential Memorandum, "Information Collection under the Paperwork Reduction Act," April 7, 2010.

Section 2.0 Characterization of the Information

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

The ADD system stores and maintains information for all individuals associated with FEMA's deployment programs; however, only employees assigned to FQS position titles are subject to FQS doctrine and have records in IQCS, and thus, not every individual whose information appears in ADD will have his or her records shared with DOI/BLM's IQCS. In addition, while FEMA stores an ample amount of data on its deployable personnel in ADD, DOI/BLM's IQCS will upload only a narrow subset of this data in support of FEMA's deployment qualifications program. The list of data elements that DOI/BLM maintains in DOI/BLM's IQCS on FEMA's behalf is included below:

FEMA ADD Data Stored in EDW/ODS and Sent to DOI/BLM IQCS:

- PID;
- Employee Full Name;
- Employee Type (e.g., PFT, TFT, CORE, or Reservist);
- Job Series;
- Recruitment Date (i.e., agency start date);
- FQS Position Title(s);
- Deployment History (job title, start and end date, station name, and disaster number);
- Agency Organization Code and FQS Program Code; and,
- Incident Set-up Information for Pre-Declaration Deployments (i.e., preliminary damage assessments, surge, and exercises).

FEMA NETC Data Manually Entered into DOI/BLM IQCS:

- EMI Course Number;
- Course Title;
- Course Location (E – Emmitsburg, L – Local Delivery, or B – Anniston, AL); and,
- Completion Date.

FEMA FEKC Data Stored in EDW/ODS and Sent to DOI/BLM IQCS:

- Employee Full Name; and,
- Transcript of FQS-Required Training Courses (including course code, course title, and course completion date)



FEMA EDW/ODS Data Sent to DOI/BLM IQCS:

- Declaration Information (incident name, number, location, and dates).

DOI/BLM IQCS Data Returned to FEMA for Upload into ADD:

- PID (referred to as the Employee ID or *EmplID* in DOI/BLM's IQCS); and,
- Current FQS Position Title(s), plus corresponding qualification status (i.e., trainee or qualified).

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

The sources of information are FEMA ADD, FEKC, and EDW/ODS systems and FQS doctrine along with DOI/BLM's IQCS system.

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

No information is used from commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

FEMA is responsible for ensuring the accuracy of its data prior to its transfer to DOI/BLM. FEMA employs various methods to ensure the accuracy of its data. Regional and headquarters program managers are responsible for reviewing and verifying their employees' records for both ADD and IQCS. DOI/BLM staff provides copies of all exception reports resulting from data transfers from ADD to IQCS to the FEMA IQCS staff for review and resolution, if needed. The IWMO Deployment Unit monitors ADD records daily, providing reports to management and forwarding concerns or suspected inaccuracies to the employee's manager. Also, an organizational abstract and employee file are imported biweekly from the U.S. Department of Agriculture National Finance Center (USDA/NFC) Database into ADD via script to reconcile the records in both databases.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that FEMA could collect inaccurate information on disaster response and recovery personnel due to the manual data entry of information into ADD.

Mitigation: FEMA mitigates this privacy risk by requiring regular reviews of the data for accuracy by the IWMO Deployment Unit. Additionally, in order to ensure accuracy following each biweekly USDA/NFC Database import, the IWMO Deployment Unit who note any discrepancies regarding the SSNs or other information immediately verify the information with the respective individual and/or point of contact (POC).



Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

FEMA collects deployment program information stored in ADD through paper forms, data extracts from the USDA/NFC Database, and telephone keypad updates via ARS. Internally, FEMA uses the information to manage the availability of disaster response and recovery personnel and tracks the details of an individual's deployments, as well as any specialties that the individual possess. Externally, FEMA transfers the information to DOI/BLM's IQCS, which aligns the data with the qualifications criteria from FQS and subsequently returns to FEMA the qualification status of those individuals involved in FEMA's deployment programs. FEMA's deployment qualification program was implemented to meet FEMA's responsibility under the PKEMRA to establish qualification standards for all emergency managers, including the FEMA disaster response and recovery personnel.

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, the project does not use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or anomaly.

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

No, there are no other components with assigned roles or responsibilities within FEMA's deployment qualifications program.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that information collected for the purpose of deployment qualifications activities may be used for other than intended purposes.

Mitigation: FEMA mitigates this privacy risk by limiting the collection of information to that which is necessary to manage individuals for deployment activities and ensure their qualification for such deployments. FEMA limits access to the collected information, either through ADD or its training and LMS, to those individuals with a "need to know" the information for performance of their duties. In addition, FEMA users of the DOI/BLM IQCS system must receive training on the use of IQCS before they are provided with system credentials. Each user, while completing the application for an IQCS account, must read the privacy policy and must accept the terms of service prior to each login.



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's deployment qualifications program is a high-profile, agency-wide endeavor to ensure that FEMA disaster response and recovery personnel have the knowledge, skills, and abilities to perform in their incident management and incident support positions. FEMA has provided notice of its deployment qualifications program through this PIA, as well as several other media, including multiple memoranda such as the memo to all FEMA employees from the Deputy Administrator, as well as a FQS tri-fold brochure, among other media. The individual deployment programs provide notice of their respective collection of information for FEMA's deployment programs.

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

Under FEMA's "Every Employee is an Emergency Manager" initiative, every new FEMA employee, once he or she accepts a FEMA position, is accepting the terms of employment, the position description, qualifications, and performance plans by signing a Conditions of Employment Agreement. Therefore, these FEMA employees would need to provide the required information or must notify their leadership if a conflict arose that would preclude their participation. FEMA Reservists must consent to participation in deployment activities and as a result, the requisite qualifications, by signing the Conditions of Employment Agreement. Although FEMA employees other than reservists, including PFTs, TFTs, and COREs, may have records in ADD for deployment purposes, they may not be subject to FQS requirements and, therefore, will not have records in DOI/BLM's IQCS.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that deployable individuals whose data is used for FEMA's deployment qualification programs will not receive notice prior to FEMA collecting their information.

Mitigation: FEMA mitigates this privacy risk by notifying FEMA employees through the interview process, as well as through the onboarding process that they may be deployed to a disaster. FEMA Reservists have expressly chosen to participate in disaster response and recovery activities by volunteering for such assignments. In addition, as noted in Section 4.1, FEMA has provided notice of FEMA's deployment qualifications program through several media, including multiple memoranda such as the memo to all FEMA employees from the Deputy Administrator, as well as an FQS tri-fold brochure, among other media.



Section 5.0 Data Retention by the project

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

Under the terms of the March 2011 MOU, DOI/BLM maintains FEMA's deployment qualifications records within DOI/BLM's IQCS. DOI/BLM's IQCS will store active records for the duration of the agreement. An active record is a record for which there have been some updates within the last four years. In the event that a disaster response and recovery personnel's record is devoid of activity for four years, that individual's record will become inactive. If the individual's record remains in inactive status for a year, DOI/BLM's IQCS will archive the individual's record and return it to FEMA. This policy is in line with the mission needs of FEMA's deployment qualifications program and the timelines associated with achieving the requirements of the PTB for each position title in FQS, which in turn, ensures that disaster response and recovery personnel are appropriately trained and qualified. FEMA's RMD is collaborating with partner agencies and NARA to establish an approved retention and disposal schedule for its deployment qualification records and deployment records that is consistent with the above referenced SORNs and the mission-driven needs of the Agency. In the meantime, data will be retained and once NARA has approved this retention and disposal schedule, this PIA will be updated and all data will be retained and disposed of in accordance with the NARA approved schedule, including retroactively.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that DOI/BLM's IQCS will retain information longer than necessary.

Mitigation: FEMA mitigates this privacy risk by establishing a policy that meets the mission needs of FEMA's deployment qualifications program. DOI/BLM's IQCS will store active records for the duration of the agreement between FEMA and DOI/BLM. In the event that a deployable individual's record is devoid of activity for four years, that individual's record will become inactive. This four-year schedule is an automated feature of DOI/BLM's IQCS application. Subsequently, if the individual remains in an inactive status for one year, DOI/BLM's IQCS will archive the individual's record and return it to FEMA.

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. FEMA shares disaster response and recovery personnel information with DOI/BLM's IQCS under the terms of a March 2011 MOU. DOI/BLM has set up a separate, segregated space (referred to as an "instance") within DOI/BLM's IQCS infrastructure to store the records pertaining to disaster response and recovery personnel and their qualification status. FEMA is responsible for managing FEMA data within its IQCS instance. BLM manages the infrastructure, including the servers and software, and



participates in the push and pull of data. FEMA's IQCS instance will query DOI/BLM's IQCS for the updated qualifications records for disaster response and recovery personnel, and FEMA will integrate those records within ADD.

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

Any sharing of information for FEMA's deployment qualifications program is covered by DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008, (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>). Specifically, routine use F will allow FEMA to share information with DOI/BLM's IQCS to promote the proper performance of official duties required to fulfill FEMA's mission in disaster response and recovery. FEMA's sharing with DOI/BLM is conducted in a manner that is consistent with this published routine use and is also compatible with the original purpose of collection.

6.3 Does the project place limitations on re-dissemination?

Yes. The sharing of information related to FEMA's deployment qualifications program is limited by the routine uses of the SORNs listed in Section 1.2. In conjunction with the aforementioned routine uses, FEMA does not share information without a demonstrated "need to know" the information requested. Furthermore, the MOU between DHS/FEMA and DOI/BLM contains language that specifically limits the re-dissemination of the information being shared between the two agencies.

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

As identified in the SORNs noted in Section 1.2 above, requests for FEMA's deployment qualifications program records are made to the FEMA Disclosure Officer, who maintains the accounting of which records have been disclosed and to whom.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that an unauthorized or inadvertent disclosure of information from either ADD or DOI/BLM's IQCS.

Mitigation: FEMA mitigates this privacy risk by sharing the information in ADD outside of FEMA only pursuant to the routine uses found in the appropriate SORN (as noted in Section 1.2 above), and even in that case, only pursuant to a written request. FEMA requires training courses of all individuals with access to ADD to ensure the proper use and handling of data. FEMA also uses SOPs to document ADD protocols and establish guidelines for how FEMA employees use ADD. In addition, the MOU between DHS/FEMA and DOI/BLM prohibits participating agencies from further disclosing information to any non-participating entity without written consent of the participating agency providing the information or disclosures required by federal statute.



Section 7.0 Redress

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

The deployment-related information within ADD is part of the DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008, (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>), and individuals may access their information via a Privacy Act or Freedom of Information Act (FOIA) request to FEMA's Disclosure Officer. Additionally, within the ADD system, the IWMO Deployment Unit accesses the information regarding FEMA's disaster response and recovery personnel. FEMA employees, including Reservists, may contact their supervisors or program managers to access their information.

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

The deployment-related information within ADD is part of the DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008, (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>), and individuals may access their information via a Privacy Act or FOIA request to FEMA's Disclosure Officer. Additionally, within the ADD system, the IWMO Deployment Unit accesses the information regarding FEMA's disaster response and recovery personnel. FEMA employees, including Reservists, may contact their supervisors or program managers to access their information. In addition, FEMA employees may access and update their information using the ARS toll-free line.

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

This PIA and the aforementioned DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008, (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>), provide notice regarding ways in which disaster response and recovery personnel may correct their information in ADD. In addition, FEMA provides notice of redress in ADD directly to disaster response and recovery personnel during their initial disaster responder orientation as well as subsequent training courses. The redress process is explained to disaster response and recovery personnel by their supervisor, program manager, team lead, or other POC. Upon transfer of the records, DOI/BLM's IQCS would reflect the corrections made in ADD.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: The privacy risk associated with FEMA's deployment qualifications program is that the individuals will be unaware of the redress process.



Mitigation: FEMA mitigates this privacy risk by providing notice of redress directly to disaster response and recovery personnel from their supervisor, program manager, team lead, or other POC during their initial training and during subsequent training courses, as noted above in Section 7.3. The redress process is explained via email, telephone, and/or in person. The supervisors, program managers, team leads, or other POCs, in turn, describe the redress process to their respective volunteers. FEMA employees and DHS SCF Volunteers who call the ARS automated hotline are also notified that they can update their information in ADD through ARS. Furthermore, ADD provides users with a Privacy Act Statement, prior to entry into the ADD system, which includes redress information. Finally, this PIA, the ADD User Manual, and the DHS/ALL-014 Department of Homeland Security Emergency Personnel Location System of Records, 73 FR 61888, October 17, 2008, (<http://www.gpo.gov/fdsys/pkg/FR-2008-10-17/html/E8-24807.htm>), offer notice of redress.

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?

The IWMO Deployment Unit follows the practices stated in this PIA by leveraging standard SOPs, orientation and training, policies, rules of behavior, and auditing and accountability. In addition, FEMA's MOU with DOI/BLM reinforces this PIA. Furthermore, FEMA and DOI/BLM hold regular meetings to ensure that the agencies communicate on matters impacting FEMA's deployment qualifications program and the information pertaining to it. These meetings offer a forum through which issues may be addressed to ensure compliance with this PIA.

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

FEMA requires that all employees who access ADD have successfully completed annual privacy and information security training in accordance with FEMA and DHS policy. In addition, the IWMO Deployment Unit provides additional training for ADD users that includes use of the system, as well as safeguarding information.

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

An ADD User Access Request Form must be completed and signed by the employee and his or her supervisor stating he or she has a legitimate reason for accessing the system, which access is required, and that the required training has been completed. Upon approval, role-based access is granted, limiting the individual to only the information which is pertinent to his or her function. FEMA limits access to its allotted space within DOI/BLM's IQCS to only those who are responsible for administering its deployment qualifications program or who are otherwise responsible for the data in DOI/BLM's IQCS.



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?

FEMA leverages MOUs and interconnection security agreements (ISA) as necessary to facilitate the information exchanges necessary to accomplish its mission. All MOUs and ISAs between FEMA and its partners are reviewed by responsible program/project managers, the FEMA Privacy Officer, the FEMA Chief Information Security Officer, the FEMA Chief Counsel, and the FEMA Operations Center Director. The MOUs and ISAs are then forwarded to DHS for formal review and approval. Currently, for deployment purposes, FEMA maintains an MOU/ISA with the USDA/NFC to verify information relating to disaster response and recovery personnel as well as an MOU with DOI/BLM for access to and use of its IQCS qualifications management tool.

Responsible Officials

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

Approval Signature

Original signed and on file at the DHS Privacy Office.

Jonathan R. Cantor
Acting Chief Privacy Officer
Department of Homeland Security