



# Privacy Impact Assessment

for the

# Contact Center Capability Modernization Program (C3MP)

DHS Reference No. DHS/FEMA/PIA-043(a)

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Homeland  
Security



## Abstract

The U.S. Department of Homeland Security (DHS or “the Department”) Federal Emergency Management Agency (FEMA), Recovery Directorate, Individual Assistance (IA) Division, Recovery Technology Programs Division (RTPD) operates the Contact Center Capability Modernization Program system (C3MP). C3MP is a contact center management system designed to provide high quality support services to disaster survivors requesting assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)<sup>1</sup> during Presidentially declared disasters. It also provides FEMA the capability to evaluate employee and contractor performance when responding to applicants’ calls to provide improved customer service. FEMA is republishing the previous Privacy Impact Assessment (PIA), DHS/FEMA/PIA-043 Contact Center Capability Modernization Program (C3MP), to maintain transparency of FEMA’s use of the system, which has expanded to now include the Office of the Chief Information Officer (OCIO), Enterprise Service Desk (ESD), and the Office of the Chief Finance Officer (OCFO).

## Overview

FEMA’s mission is to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards. As part of this mission, FEMA’s contact centers have the critical responsibility of providing contact center and case management services for disaster survivors who require financial assistance to recover from federally declared disasters.

FEMA’s Office of Response and Recovery (ORR), OCIO, and OCFO use C3MP to provide call center customer service to various FEMA stakeholders. These stakeholders include, but are not limited to, disaster survivors (“survivors,” see Appendix B for definition of terms of reference related to those contacting FEMA using C3MP); FEMA employees and contractors; employees from other federal agencies (Internal Revenue Service (IRS), Census Bureau, DHS Surge Capacity workforce employees who need FEMA domain accounts to assist with disaster support, Office of Inspector General (OIG), and FEMA Corps) with FEMA accounts; FEMA grantees; and external stakeholders who use FEMA services.

C3MP replaced and consolidated the function of three existing systems:

- 1) Advanced Call Center Network (ACCN) - provides the intelligent routing of applicant calls to ensure quality support services to callers;
- 2) Electronic Work Force Management (eWFM) - manages the call center workforce and

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<sup>1</sup> Robert T. Stafford Disaster Relief and Emergency Assistance Act, PL 100-707, signed into law November 23, 1988; amended the Disaster Relief Act of 1974, PL 93-288.



- performance by providing forecasting, scheduling, and tracking of duties to ensure the call centers are appropriately staffed; and
- 3) Quality Assurance Recording System (QARS) - provides call centers a means to evaluate call center employees and contractors by recording calls and screen shots.

The FEMA OCIO Enterprise Service Desk provides technical support to callers that require assistance with their online account access such as password reset. OCIO Enterprise Service Desk callers include survivors (members of the public); FEMA employees and contractors; and employees from other agencies with FEMA accounts. OCIO Enterprise Service Desk uses C3MP for call center support to include using the records for training and quality assurance purposes.

OCFO operates the FEMA Finance Center (FFC) which provides assistance to FEMA employees who are on official travel and to support survivors (e.g., members of the public) in efforts to recoup grant money. FEMA Finance Center will not use C3MP to record any FEMA Finance Center calls. FEMA Finance Center will use C3MP to receive phone calls made by individuals calling into its four helplines: (1) Travel Helpline, (2) Accounts Receivable Helpline, (3) FEMA Finance Center Recoupment Helpline, and (4) Travel Card Helpline. For quality assurance purposes, C3MP will permit supervisors to monitor phone calls; however, no personally identifiable information (PII) will be recorded by any C3MP capability. C3MP also provides the FEMA Finance Center the ability to add internal FEMA phone lines to provide additional customer support, as needed.

C3MP has three major components: (1) Inter-Exchange Carrier (IXC) 800 Network; (2) Consolidated Interaction Center (CIC); and (3) Workforce Management.

#### 1. Inter-Exchange Carrier (IXC) 800 Network

Inter-Exchange Carrier 800 Network is the 1-800 service and interactive voice response (IVR) component of C3MP. The interactive voice response enables the call centers to determine applicant requirements by using touch-tone recognition. The interactive voice response delivers automated messages to the caller and interacts with the FEMA Individual Assistance (IA) System<sup>2</sup> database for self-help requests that provide status information without agent interaction. The Operational Data Store (ODS)<sup>3</sup> is the system that updates the Individual Assistance database nightly. This update provides the applicant with status information. The interactive voice response

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<sup>2</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, FEDERAL EMERGENCY MANAGEMENT AGENCY, PRIVACY IMPACT ASSESSMENT FOR INDIVIDUAL ASSISTANCE (IA) PROGRAM, DHS/FEMA/PIA-049 (2018), available at [Privacy Documents for FEMA | Homeland Security \(dhs.gov\)](https://www.dhs.gov/privacy-documents-for-fema-homeland-security).

<sup>3</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, FEDERAL EMERGENCY MANAGEMENT AGENCY, PRIVACY IMPACT ASSESSMENT FOR OPERATIONAL DATA STORE (ODS) AND ENTERPRISE DATA WAREHOUSE (EDW)-APPENDIX UPDATED, DHS/FEMA/PIA-026 (2018), available at [Privacy Documents for FEMA | Homeland Security \(dhs.gov\)](https://www.dhs.gov/privacy-documents-for-fema-homeland-security).



collects information from applicants to provide verification for self-help automatic status. Some examples of this information are Date of Birth and Registration ID.<sup>4</sup>

## 2. Consolidated Interaction Center (CIC)

Consolidated Interaction Center desktop software applies established business rules to the call center management. These include hours of operation, disaster specific guidelines, and expected caller delay settings. This function helps determine the best way to route the applicant's call based on the keypad options the applicant chooses, the established business rules, and which call center has an available Human Services Specialist (HSS). Human Services Specialist personnel are live call center operators who are either FEMA employees or contractors.

## 3. Workforce Management

FEMA replaced Workforce Optimizer, described in the previous Privacy Impact Assessment, with a tool called Workforce Management, which performs the same functions as Workforce Optimizer. Workforce Management provides workforce management capabilities, such as call volume forecasting, work schedule generation, and associated reports. The Workforce Management function collects information from FEMA employees and contractors, such as name, email address, and network user ID to create and maintain employee/contractor work schedules and to track adherence to requirements and other performance metrics.

FEMA uses various functions and capabilities in C3MP including Voice and Screen Recording; Desktop Screen Recording Not Related to a Telephone Call; Quality Evaluation; FEMA Employee and Contractor Desktop Software Usage; FEMA Employee and Contractor Desktop Software Usage; Additional Languages for Interactive Voice Response (IVR); Selecting Survivor ZIP Code or State; and Automated Post-Call Referrals.

### *Voice and Screen Recording*

C3MP records 100% of all incoming and outgoing calls<sup>5</sup> (1) to and from FEMA's designated disaster assistance helplines; (2) in response to customer satisfaction assessments; (3) on internal lines used for Human Services Specialist support by the National Coordination Team Assistance Group (NCT AG); and (4) with the OCIO Enterprise Service Desk. FEMA may reduce this percentage during times of extremely high call volumes. Audio call and screen recordings support internal employee and contractor performance evaluation, training, and quality assurance purposes to improve service to FEMA's customers. Phone call and screen recordings capture information about FEMA employees and contractors because they provide customer service during phone interaction and case review. Any applicant personally identifiable information may be provided by the applicant verbally for FEMA to provide assistance or may be present on the FEMA

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<sup>4</sup> See Section 2.1 of this Privacy Impact Assessment for a full list of data collected.

<sup>5</sup> This does not include call center support to OCFO FEMA Finance Center.



employee or contractors' screen as they provide assistance to the applicant when accessing their National Emergency Management Information System (NEMIS) file. The focus of call and screen recording is employee and contractor quality assurance; thus, the capture of any applicant personally identifiable information is incidental and not collected or used for any other purpose.

Voice recordings are initiated when:

- An applicant calls FEMA's 1-800 line regarding disaster assistance;
- An applicant calls FEMA (or is called by FEMA) in response to FEMA's request for customer satisfaction assessment;
- A FEMA employee or contractor calls the Recovery Service Center (RSC) internal department for support during a transaction with a disaster assistance applicant; or
- A FEMA employee or contractor calls through designated lines in the registration and case review process.

C3MP collects and maintains voice recordings and the corresponding desktop screen snapshots of the following transaction types:

- FEMA employees, contractors, and/or disaster assistance applicants providing assistance or as part of the customer satisfaction assessment process;
- FEMA employees or contractors assisting disaster applicants;
- FEMA employees or contractors for quality assurance reviews and training purposes during non-call-related case reviews;
- FEMA supervisory staff, quality control specialists, or contract oversight specialists evaluating employee or contractor calls and case review screen transactions; and
- Recovery Service Center supervisors, quality control specialists, and training specialists' evaluating to ensure alignment and consistency across the enterprise.

For registration intake calls only, Individual Assistance disaster applicants are presented with an automated Privacy Notice. Before being transferred to a live agent for assistance, Individual Assistance disaster applicants receive notification that their calls may be monitored and recorded. FEMA employees and contractors are provided the same notification, but this notification is provided to during the initial employee training.

A typical call transaction using C3MP will take place after the President of the United States declares a disaster following a particular event. Once a disaster has been declared, an applicant may call the toll-free FEMA assistance number to apply for Individual Assistance. Following the initial recorded FEMA greeting that includes a notice to the caller that the call is





being recorded, the caller must specify their language preference. The language preferences are English, Spanish, Russian, Creole, Mandarin, Vietnamese, Samoan, and Arabic. If a language option is not chosen, the applicant is routed to a Human Services Specialist. The interactive voice response provides the caller with the Uniform Record Locator (URL) for the FEMA Disaster Assistance website (<https://www.disasterassistance.gov/>). The applicant is asked to enter the five-digit ZIP code for the area in which the damage occurred. If the call comes outside the hours of operation or during an observed holiday, a closed message with hours of operation and the FEMA Disaster Assistance website (<https://www.disasterassistance.gov/>) is given, through which the applicant can apply for assistance on the FEMA website. If the call is within the hours of operation, the main menu provides the applicant with three call-routing options: 1) apply for disaster assistance; 2) automated self-help/status check; and 3) helpline, whereby an applicant connects with a Human Services Specialist who may help update the applicant's disaster application or provide other assistance. The interactive voice response routes the call or notifies the caller of the minimum expected delay. Below are more details on each call-routing option.

Option 1) Apply for disaster assistance: First, C3MP connects the caller to an automated Privacy Notice (attached as Appendix C). The next message provides the applicant with a list of information needed to complete the registration intake interview. C3MP then routes the applicant to a queue to connect with the next available Human Services Specialist to complete the registration intake interview. The applicant's connection to C3MP ends when they are routed to the Human Services Specialist queue. An applicant cannot complete a registration via telephone keypad inputs through C3MP; they must speak with a Human Services Specialist.

Option 2) Automated self-help/status check: C3MP connects the applicant to the self-help menu. The applicant is asked to provide the following for verification purposes: FEMA registration ID, last four (4) digits of the applicant's Social Security Number (SSN); and date of birth. The applicant enters the data via keypad, which is then queried against the Individual Assistance database for authentication. If any of the information provided by the applicant does not match information in the Individual Assistance database, the interactive voice response responds with an error message. Following several failed validation attempts, the applicant is then transferred to a queue to connect with the next available Human Services Specialist. The Human Services Specialist will verify the applicant's identity by asking for a combination of first and last name, last four of the Social Security Number, address, phone number, and date of birth. These questions are used to verify the information that was given to FEMA during the applicant's initial intake.<sup>6</sup> On the other hand, if the information entered by the applicant is correct, the entered data is authenticated against the Individual Assistance database, and the applicant receives an automated status update. C3MP does not provide any personally identifiable information in the automated

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<sup>6</sup> This verification process is discussed more fully in the Individual Assistance Privacy Impact Assessment.



status update. Once the applicant has completed self-help, the applicant may hang up or elect to be transferred to a queue to speak with a Human Services Specialist.

Option 3) Helpline: C3MP connects the applicant to a queue, which then connects to a Human Services Specialist to assist with the disaster application updates and/or questions. In this case, the Human Services Specialist provides the Privacy Notice (attached in Appendix C) to the applicant before requesting any additional information from the applicant.

For all options, the call recording begins when the caller and the FEMA employee or contractor are connected on FEMA-designated disaster assistance help lines. Calls placed to and from non-designated disaster assistance help lines are not recorded in C3MP. FEMA provides notice of recording to callers using a pre-recorded Privacy Notice while callers wait in queue to speak with a FEMA employee or contractor. FEMA employees and contractors who speak with applicants also read a scripted Privacy Notice. Employees and contractors are informed during training that their calls and screenshots will be recorded and monitored for quality assurance.

FEMA employees' or contractors' desktop computer screens may also be recorded to accompany the voice transaction. If a call also includes desktop screen captures, then the screen recording begins simultaneously with the voice recording. Recording the desktop screens during voice transactions allows the quality control specialist or supervisor to observe the FEMA employee or contractor's disaster assistance data entry and review accuracy.

### Desktop Screen Recording Not Related to a Telephone Call

In addition to processing applications over the telephone, FEMA employees and contractors process disaster assistance applications by reviewing the applicant's case file maintained in the Individual Assistance system to determine eligibility. During this case review and processing, C3MP records a random percentage of government desktop computer screen shots based on the FEMA employee or contractor's identification or specific work assignment.

A portion of the recorded screen shots are evaluated in C3MP, archived, and held for six years to allow time to resolve any personnel matters that may arise from the use of C3MP data for employee or contractor performance evaluations or to determine qualifications for continued employment. Recordings for evaluation can be selected randomly and assigned to quality control staff for review. Due to the volume of calls received and resource limitations, FEMA does not evaluate every call. Accordingly, the Quality Control process takes a sampling of calls to measure quality of service. Supervisors may also select recordings of their team members and perform evaluations for quality. FEMA purges the audio and screen recordings that are collected but not used in an evaluation of a FEMA employee or contractor within 45 days.

### Quality Evaluation



The supervisor, quality control specialist, contract specialist, or training specialist performs evaluations that are maintained in C3MP. FEMA sets targets for the percentage of Recovery Service Center transactions to be evaluated in C3MP based on factors including call volumes, special project initiatives (e.g., a recertification project), and training objectives. C3MP recordings are selected randomly or targeted for evaluation of the quality of service delivered to the disaster assistance applicant. The evaluator uses the appropriate FEMA-approved Quality Assurance Recording System evaluation form to assess the employee or contractor's quality of work along with a system-generated result. These results are generated by weighing various evaluation criteria. Supervisors grade the employees' quality of interactions with members of the public, FEMA employees, and contractors that are included in the results. C3MP then assigns scores to each criterion. The tabulation is based on the combination of these scores and weights. C3MP stores the results, and the supervisor retrieves it using the employee or contractor's name and user identification number for subsequent review and evaluation. C3MP quality evaluations are typically made available to the employee or contractor for review and possible discussion.

FEMA also determines training opportunities for its employees and contractors based on the evaluations stemming from the C3MP recordings. Contract staff calls are evaluated by FEMA supervisory, quality control, or contract oversight staff according to the contract provisions between FEMA and the contracting entity. Calibration sessions are conducted in which representatives from each Recovery Service Center perform evaluations on recorded transactions, compare results, and establish consensus on the quality management process to ensure calls are evaluated in a consistent manner across the Recovery Service Centers.

C3MP recordings can be played back at the discretion of the supervisor or quality control reviewer. C3MP records are used as training tools for employees and contractors during their quality control evaluation process. Through C3MP, Recover Service Center Human Services Specialist supervisors and Special Processing Unit (SPU) staff assess the quality of service provided to applicants. Customer Survey & Analysis (CSA) supervisory staff ensures delivery of quality service by those performing customer satisfaction assessments of both Individual Assistance and Public Assistance recipients. The program assists the Training Department and National Coordination Team Assistance Group by providing consistent guidance and training recommendations based on findings from the recordings. C3MP provides Individual Assistance Contract Management Section (IA-CMS) with insight to measure the level of quality and performance provided by contract staff both within the Recovery Service Center or providing support remotely, such as language translation services.

### *FEMA Employee and Contractor Desktop Software Usage*

Supervisory and performance management staff use C3MP to analyze the performance of employees or contractors. To do so, they document how the employees and contractors navigate through the various software applications used to provide customer service to applicants.





Application usage is logged by C3MP and used to assess current processes and employee performance to optimize efficiency within the Recovery Service Centers by providing data related to the length of time spent in systems or applications throughout the day. The primary privacy risk with C3MP is that information collected from applicants could be used in a manner inconsistent with the purpose of collection.

FEMA mitigates this risk by implementing the following controls: 1) C3MP does not retain the personally identifiable information that the applicant inputs via the telephone keypad; 2) FEMA has limited the personally identifiable information requested from the applicant for use by C3MP to only what is necessary to match the applicant and the disaster registration requested; and 3) when the personal information of applicants stored in C3MP is viewable, the personal information may only be viewed by authorized personnel established through the use of access control limitations explained in Section 8.3 allowing only users with the appropriate user roles, training, and a relevant “need to know” to view the personal information, to include the incidental collection of applicant personal information during audio recordings and screen captures. Voice recordings are held for six years. Those portions of the voice and screen recordings that are reviewed for workforce quality assessment are archived and held for six years to allow time to resolve any personnel matters that may arise from the use of quality assessment data for employee or contractor performance evaluations or to determine qualifications for continued employment. FEMA purges audio and screen recordings that are not used in an evaluation of a FEMA employee or contractor within 45 days.

### *Additional Languages for Interactive Voice Response (IVR)*

Interactive Voice Response is a public call-in number, separate from the FEMA internal call-in numbers, used as an Auto-Attendant that provides intelligent routing instructions for phone calls originating from survivors. The system will prompt survivors to enter their ZIP codes and/or state of their damaged property as well as the survivor’s language preference (in addition to English and Spanish, the system will now prompt survivors to select their language preferences in Russian, Creole, Mandarin, Vietnamese, Samoan, Arabic, and other languages) before routing to an agent. Only disaster survivors selecting English or Spanish and requesting an automatic account status will be prompted for additional identifying information, including registration ID, last four digits of the Social Security Number, and the date of birth. The interactive voice response captures this information only long enough to provide a status to the survivor. After verification is complete, the survivor will receive a recorded message concerning the survivor’s application status. Immediately after the status is provided, the information is deleted from the interactive voice response. The system does not allow survivors to file a claim via keypad inputs; they must connect with an agent. Survivors have the option to route to a live agent at this point. During periods of high call volume with longer wait times, the system may prompt the survivors and other callers with the option to receive a callback instead of waiting on hold. If this option is chosen, the system



will prompt the caller to enter the phone number that they wish to use to receive the call back. The phone number entered will be replayed to ensure accuracy. After a callback, the phone number is deleted from the C3MP system.

### Selecting Survivor ZIP Code or State

Survivors that call in to the interactive voice response have the option to say or type in their state or ZIP code in which their house or dwelling was damaged by a disaster. This tool allows survivors whose phone number differs from the house or dwelling to identify the location of their damaged property. For example, a survivor who is calling from a relative's phone number in New York would be able to identify their disaster destroyed house in Texas. This tool is used only for routing purposes; no information from the caller is saved by this tool.

### Automated Post-Call Referrals

An additional interactive voice response function is post-call referrals. Post-call referrals are only available to survivors who are calling to apply for disaster assistance and/or to check the status of their applications. Once a survivor completes their initial registration or has obtained information from FEMA's Helpline, based on needs identified in the call, the agent makes a selection in the C3MP system for the referral type. Following the call with the agent, the survivor remains on the line for the automated referral to additional programs/agencies that may be of assistance.

FEMA anticipates implementing Post-Call Surveys as well as Chat and Email features to C3MP.

### Post-Call Surveys.

The interactive voice response will also provide post-call surveys to grade the caller experience of survivors who contact a FEMA toll-free number. Survivors will have an option to voluntarily complete the survey following the phone call with an agent. The post-call survey will document the survivor's experience as it relates to recent interaction with FEMA. The survey is in development. It will relate to agent performance, knowledge, and assistance. Survivors will enter responses by selecting a corresponding telephone digit. The survey will not collect any personally identifiable information from the survivors; it will only collect the customer satisfaction responses in relation to their most recent phone interaction experience with a FEMA agent. The survivor's responses to the survey questions will be stored in C3MP. A Privacy Threshold Analysis (PTA) for the survey, as well as any Paperwork Reduction Act (PRA) documentation, is pending, and no collection of information will occur until a Privacy Threshold Analysis is adjudicated for the collection. The post-call survey will be auto generated once the conversation is complete. This is not a current capability and may be implemented in the future.

### Chat and Email Feature



In addition to audio calls and screen recordings, the chat and email features within the C3MP platform (i.e., not Outlook or Skype) are available for use in support of FEMA employee and/or contractor performance evaluation, training, and quality assurance purposes to improve services to FEMA customers. The email and chat feature records FEMA employees and/or contractors as they provide customer service while using the chat or the email feature with the applicant. The focus of the recordings is on the quality of employee and contractor customer service; thus, the capture of any personally identifiable information is incidental. This is not a current capability and may be implemented in the future.

The following are examples of typical FEMA use of C3MP to support disaster survivors:

- A disaster survivor that needs help with registering for FEMA assistance or checking the status of their application for assistance. The disaster survivor will reach out to FEMA's main line of business for disaster support. The C3MP interactive voice response system has the option to toggle between asking for the applicant's ZIP code or state. After the caller provides their ZIP code or state, their call is directed to a FEMA agent. When the agent answers the call via C3MP, the call recording begins. At the end of the call, the disaster survivor is typically offered information for additional assistance from other agencies. This information is provided through an automated recording that the FEMA agent chooses based on the agent's interaction with the applicant. This is known as an "Automated Post-Call Referral."
- The FEMA Enterprise Service Desk Internet Help Desk (IHD) line of business is utilized by survivors who are having trouble accessing their registration information on the FEMA Disaster Assistance website (<https://www.disasterassistance.gov/>). Disaster survivors who call into the Enterprise Service Desk Internet Help Desk receive assistance with password issues, website navigational issues, or errors with the site. When the Enterprise Service Desk agent answers the call via C3MP, the call recording begins.

The following are examples of typical OCIO Enterprise Service Desk and OCFO FEMA Finance Center calls supporting FEMA employees and contractors and employees from other agencies with FEMA accounts:

- An internal FEMA employee or contractor that has a FEMA account and has forgotten their network login credentials such as username or password. This individual would dial the designated Enterprise Service Desk Mainline telephone number to speak with an Enterprise Service Desk agent, who will help assist with the account issue. When the Enterprise Service Desk agent answers the call via C3MP, the call recording begins.



- Users that need to apply for, track, and manage all FEMA grants, both disaster and non-disaster, will dial the designated Enterprise Service Desk FEMA Grant Outcomes (GO) telephone number to speak with an Enterprise Service Desk agent. FEMA Grant Outcomes supports active grants programs in the Agency which support FEMA missions in prevention, protection, mitigation, response, and recovery. FEMA Grant Outcomes is used by both FEMA and, currently, firefighters seeking disaster grants. When the Enterprise Service Desk agent answers the call via C3MP, the call recording begins.
- FEMA employees and contractors that need assistance setting up and modifying travel arrangements (making reservations, preparing Travel Authorizations, preparing Travel Vouchers, or assistance with routing or other system issues) call the Concur Travel System for assistance. Disaster applicants call the FEMA Finance Center Recoupment Helpline to set up payment plans, make payments, or ask payment questions. Calls are also placed to make payments on Temporary Housing Units (THU) or travel overpayments. Calls are also transferred from the Recovery Service Center helpline to the FEMA Finance Center Recoupment Helpline.

## Section 1.0 Authorities and Other Requirements

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

The following legal authorities apply to C3MP:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5174 (Stafford Act). Section 408 of the Stafford Act authorizes FEMA, as the designee of the President of the United States, to provide federal assistance to individuals and households. The same section mandates the creation of a system of records to identify recipients, of which C3MP is a part.
- Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5170b. Section 403 of the Stafford Act authorizes FEMA, as the designee of the President of the United States, to provide assistance essential to meeting immediate threats to life and property resulting from a major disaster. FEMA provides this assistance through its Public Assistance Program.
- The Government Performance and Results Modernization (GPRA) Modernization Act of 2010, 31 U.S.C. § 1115, requires quarterly performance assessments of Government programs for purposes of assessing agency performance and



improvement, and to establish agency performance improvement officers and the Performance Improvement Council.

- E-Government Act of 2002, 44 U.S.C. § 101, requires enhancements to improve the performance of Government in collaborating on the use of information technology to improve the delivery of Government information and services. C3MP uses technology to improve the delivery of disaster assistance.
- 5 U.S.C. § 4302. The establishment of performance appraisal systems is required by DHS regulation. C3MP implements part of the performance appraisal system for Call Center operators.
- 6 U.S.C. § 795. The establishment of controls to prevent fraud, waste, and abuse is required by DHS. C3MP facilitates the intake of information used to determine eligibility and implements part of the control for the prevention of fraud, waste, and abuse.
- Executive Orders 13571 and 13411. These Executive Orders require streamlining service delivery and customer service and improvement of assistance to disaster survivors. C3MP serves to improve customer service functions at the FEMA Call Center used by disaster survivors.
- The authority to collect Social Security Numbers during the process of disbursing Federal disaster assistance is conferred under 31 U.S.C. § 7701(c)(1) and Executive Order 9397, as amended by Executive Order 13478.
- 5 C.F.R. § 430.102. The DHS regulations on Performance Management require the Agency to create a systematic process by which an agency involves its employees, as individuals and members of a group, in improving organizational effectiveness in the accomplishment of agency mission and goals. C3MP functions to implement personnel management processes.
- The Clinger Cohen Act of 1996, 40 U.S.C. §§ 11101-11704, which provides guidance for multiagency investments and guidance for interagency support.
- Federal Information Security Modernization Act (FISMA) of 2014, 44 U.S.C. § 3541, et seq., which requires federal agencies to develop, document, and implement an information security and protection program.

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

The following System of Records Notices (SORN) apply to the information:





- OPM/GOVT-1 General Personnel Records, which makes Official Personnel Folders the official repository of records, personnel actions, and documentation required in connection with an employee's Federal service;<sup>7</sup>
- DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS), which will collect a discreet set of personally identifiable information to provide authorized individuals access to, or interact with DHS information technology resources, and allow DHS to track the use of DHS IT resources;<sup>8</sup>
- DHS/ALL-008 Accounts Receivable System of Records, which allows DHS to collect and maintain records on accounts receivable, which enables DHS to have an accurate accounting of money it is owed;<sup>9</sup>
- DHS/FEMA-002 Quality Assurance Recording System, which enables FEMA's Quality Control Department, Customer Satisfaction Analysis Section, Contract Oversight Management Section, and FEMA Recovery Service Center Supervisory staff to better monitor, evaluate, and assess its employees and contractors so that FEMA can improve customer service to those seeking disaster assistance. The purpose is consistent with FEMA's mission to improve its capability to respond to all hazards and support the citizens of our Nation;<sup>10</sup>
- DHS/FEMA-008 Disaster Recovery Assistance Files, which details FEMA's collection and maintenance of records on applicants for its Disaster Assistance programs that provide financial and other tangible assistance to survivors of presidentially declared disasters or emergencies;<sup>11</sup> and
- DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs, which enables FEMA to administer the Public Assistance grants program, Hazard Mitigation Assistance grants programs, and other disaster grants and disaster loan programs to mitigate and recover from emergencies and disasters and to assess the customer satisfaction of FEMA public assistance applicants while

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<sup>7</sup> See OPM/GOVT-1 General Personnel Records, 77 FR 74815 (December 11, 2012), as modified by 80 FR 74815 (November 30, 2015), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>8</sup> See DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS), 77 FR 70792 (November 27, 2012), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>9</sup> See DHS/ALL-008 Accounts Receivable System of Records, 83 FR 65176, (December 19, 2018), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>10</sup> See DHS/FEMA-002 Quality Assurance Recording System of Records, 82 FR 32564 (July 17, 2017), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>11</sup> See DHS/FEMA-008 Disaster Recovery Assistance Files, 87 FR 7852 (February 10, 2022), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).



allowing FEMA to prevent the duplication of benefits and recoup improper payment.<sup>12</sup>

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

A system security plan has been completed for the information system(s) supporting this project. The project received its Authority to Operate (ATO) under FISMA in September 2021, and this Authority to Operate extends through July 30, 2024. FEMA will continue to maintain an Authority to Operate throughout the system lifecycle as required by statute and policy.

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

C3MP uses the same approved schedules as its predecessors Advanced Call Center Network Platform and Quality Assurance Recording System. Records and reports related to and regarding call recordings when an agent was evaluated by FEMA's quality control staff are maintained by FEMA for three years and then transferred to the Federal Records Center (FRC), which will destroy after six years (N1-311-08-1, Item 1). Records and reports related to and regarding unevaluated call recordings, including screen captures, are maintained for 45 days after the date of recording (N1-311-08-1, Item 2).

### **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.**

Appendix A lists the forms used by the C3MP system.

## **Section 2.0 Characterization of the Information**

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

FEMA collects the following information from FEMA employees and contractors to support the Workforce Management function:

- First and last name;
- Email address;

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<sup>12</sup> See DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs, 79 FR 16015 (March 24, 2014), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).



- Network user ID;
- Customer Interaction Center (CIC) ID;<sup>13</sup> and
- Effective hire date.<sup>14</sup>

The interactive voice response uses information from disaster applicants to verify the survivors' identities by querying the information against the Individual Assistance database for authentication. This information is not stored in C3MP and C3MP does not have functionality to store information input by applicants via the phone keypad; this information is automatically cross-referenced (not requiring human involvement) with the applicant file in National Emergency Management Information System that has been collected outside of C3MP. All of the below information is required and only used to allow the system to provide self-help automation status:

- Date of birth;
- Last four digits of Social Security Number; and
- Registration ID.

FEMA may incidentally capture information from disaster applicants through audio and/or screen recordings that are captured for quality assurance purposes only. The focus of the audio and/or screen recordings is to capture information about the FEMA employees and contractors when they provide customer service during phone interaction and case review for disaster applicants to support internal employee and contractor performance evaluation, training, and quality assurance to improve service to FEMA's customers. Thus, the capture of any personally identifiable information from disaster applicants is incidental and not collected or used for any other purpose. The below information, which is initially collected outside of C3MP and contained within the disaster applicant's National Emergency Management Information System file, may incidentally be captured and unable to be redacted or masked in C3MP. This information may be provided by the applicant verbally for FEMA to provide assistance or may be present on the FEMA employee and/or contractor's screen as FEMA provides assistance to the applicant when accessing their National Emergency Management Information System file:

- Applicant's name;
- Social Security Number;
- Home address;

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<sup>13</sup> Customer Interaction Center ID is identification provided to employees and contractors used to log into the phones.

<sup>14</sup> Criteria used to establish accrued leave and manage time off requests based on the FEMA employees and contractor time with the agency.



- Current phone numbers (e.g., home, cell);
- Current mailing address;
- Email address; and
- Personal financial information including the disaster applicant's bank name, bank account information, insurance information, applicant or household income, number of occupants and dependents, and dollar amount of their losses.

FEMA generates the following data from audio recordings and screen captures:

- Contact ID (a unique identification assigned to each recorded contact in C3MP);
- Performance and Quality Results Reports; and
- A "quality result"<sup>15</sup> about the FEMA employee/contractor who conducts the phone transaction/case review involving an applicant or public disaster assistance applicant's file or request for internal assistance.

C3MP receives daily statistical information from the Enterprise Data Warehouse (EDW) and Document Management and Records Tracking System (DMARTS)<sup>16</sup> to display employee or contractor performance data within C3MP. Data received from the Document Management and Records Tracking System includes:

- FEMA Agent ID;
- Action denoted in the system (for example Reprocess, Archive, and Add date, time (hours, minutes, and seconds));
- Date;
- Time (hours, minutes, seconds) Enterprise Data Warehouse (IA Timestamp Report);
- FEMA Agent Name (First & Last);
- Action (e.g., route, cancel, hold);
- Process (e.g., applicant inquiry, applicant update);
- FEMA employee or contractor; and

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<sup>15</sup> A quality result is an assessment of the employee's performance related to an interaction within the system.

<sup>16</sup> See U.S. DEPARTMENT OF HOMELAND SECURITY, FEDERAL EMERGENCY MANAGEMENT AGENCY, PRIVACY IMPACT ASSESSMENT FOR THE DOCUMENT MANAGEMENT AND RECORDS TRACKING SYSTEM (DMARTS), DHS/FEMA/PIA-009, *available at* [Privacy Documents for FEMA | Homeland Security \(dhs.gov\)](#).



- Username.

The interactive voice response uses information from disaster survivors that request an application status update when dialing into FEMA's mainline (1-800-621-FEMA) and selecting option 2 (application status). This information is used for verifying their identity and is queried against the Individual Assistance database for authentication. This information is not collected and stored in C3MP and C3MP does not have functionality to retain information input by applicants via the phone keypad; this information is automatically cross-referenced (not requiring human involvement) with the applicant file in National Emergency Management Information System that has been collected outside of C3MP. The below information is required and only used to allow the system to provide self-help automation status:

- Last four digits of Social Security Number;
- Registration ID (assigned when survivors open a new case with FEMA); and
- Date of Birth.

Information from audio and/or screen recordings may contain the information for FEMA employees, contractors, and grant recipients who call into the Enterprise Service Desk. The focus of the audio and/or screen recordings is to capture information about the FEMA employees and contractors when they provide customer service during phone interaction and case review for disaster applicants to support internal employee and contractor performance evaluation, training, and quality assurance to improve service to FEMA's customers. Thus, the capture of any personally identifiable information from disaster applicants is incidental and not collected or used for any other purpose.

### Grant Recipient

- First and last name;
- Phone number;
- Current work address;
- Date of birth;
- Mother's maiden name;
- Work email address;
- Network User ID;
- Vendor ID; and
- Grant number.





## FEMA Employee/Contractor

- First and last name;
- Phone number;
- Network User ID;
- Electronic Data Interchange Person Identifier; and
- Person Handle – a unique personal identifier that is assigned to every DHS employee and contractor at the time they pass their suitability determination to work at DHS. It was developed for use in lieu of Social Security Number to reduce privacy risks to DHS personnel.

Audio and/or screen recordings may contain the following information for FEMA employees, contractors, and those surveyed by Customer Survey & Analysis for Public Assistance (i.e., State, Local, and Tribal Entities):

- FEMA agent ID;
- FEMA agent name (first and last);
- FEMA employee or contractor; and
- FEMA username;
- Individual Assistance;
  - First and last name;
  - Registration ID;
  - City;
  - State;
  - Phone number; and
  - Email address.
- Public Assistance;
  - Entity address;
  - Name;
  - Title;
  - Phone number;
  - Extension;



- Email address of contact and alternate contact;
- Disaster number and state;
- Applicant ID;
- Parent ID;
- Applicant name;
- Applicant type;
- Grantee type;
- Private non-profit type;
- City;
- ZIP code;
- County;
- Disaster type;
- Declaration date;
- Region; and
- Fiscal year.

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

The information sources for C3MP come directly from Individual Assistance disaster applicants. Disaster applicants phone the FEMA call center and enter the necessary information to verify identity when requesting an automated status update. FEMA employees and contractors provide their identifying information while providing customer service to disaster applicants, conducting processing reviews of a disaster applicant's file, providing support to internal departments, or performing customer satisfaction assessments. FEMA employees and contractors provide their own information when calling FEMA OCFO to arrange travel.



### **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, C3MP does not use publicly available data or information from commercial sources.

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

C3MP assumes the information originally provided by the survivor is accurate. During a typical call transaction, a survivor may verify the accuracy of the data used for identification purposes by entering the information at the prompts. After several retries, if the data entered does not match data within the database, the survivor will be connected to a Human Services Specialist, who can orally verify the data with the survivor. The survivor can also reach a Human Services Specialist at the end of the self-help option to update or correct the data the individual provided. The data is orally verified by the Human Services Specialist as it is modified or updated.

The call recordings and screen captures in C3MP provide a snapshot of individual customer service transactions. Call recordings and screen captures are not retrievable by survivor name. The way information is collected/maintained in C3MP has no impact on a disaster survivor's ability to obtain FEMA assistance. If, during the review of a recorded transaction, an evaluator notices inconsistent information about a survivor between a recording and a screen capture, the evaluator reports the inconsistency to FEMA personnel who can update the record in the system.

Periodic system audits ensure employee and contractor data remains current and accurate and provides an opportunity to correct erroneous data.

The survivor information (registration ID, date of birth, and last four digits of Social Security Number) is used to verify the survivors' identity by querying the information against the Individual Assistance database for authentication. This information is not collected and stored in C3MP, and C3MP does not have functionality to retain information input by applicants via the phone keypad. This information is automatically cross-referenced (not requiring human involvement) with the applicant file in National Emergency Management Information System that has been collected outside of C3MP.

The Enterprise Service Desk ensures the accuracy of callers' data by verbally verifying information such as the user's name, location, and the user's Electronic Data Interchange Person Identifier (EDIPI) - a unique 10-digit number associated with DHS personnel's personal identity verification (PIV) card. Callers are not given the option to verify any of their information via telephone prompts.

The FEMA Finance Center ensures the accuracy of callers' data by verbally verifying information such as the caller's name, phone number, employee number, dates of travel, and travel



location. The callers are not given the option to verify any of their information via telephone prompts.

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

**Privacy Risk:** There is a privacy risk that FEMA may collect more information than is required or needed for the purposes of C3MP, to include account verification, quality assurance, and employee/contractor evaluation.

**Mitigation:** This risk is partially mitigated. FEMA partially mitigates this risk by only asking for the minimal information from survivors, federal employees, and contractors to identify the caller in support of providing status of their application, resolve technical issues with access, or assist with deployment planning and travel. For example, C3MP only prompts the applicant to provide the minimal amount of personally identifiable information necessary to retrieve their file and find a status (e.g., eligible, ineligible, duplicate information, pending).

If a caller requires live agent assistance, then those calls may be recorded. FEMA cannot fully mitigate overcollection of personally identifiable information when assisting customers during recordings due to the possibility of the customer providing more personally identifiable information than necessary or required. FEMA must review the entire conversation or interaction between FEMA staff and survivors which will include any information solicited or not solicited by FEMA staff.

**Privacy Risk:** There is a privacy risk that FEMA may collect and maintain inaccurate information regarding survivors, federal employees, and contractors.

**Mitigation:** This risk is mitigated. FEMA mitigates this risk by originally collecting information directly from survivors or FEMA personnel. During the initial call intake process, FEMA verifies the information and if inaccurate assists the caller with either correcting or advising them how to correct the information.

**Privacy Risk:** There is a privacy risk that FEMA may collect erroneous information from the Individual Assistance disaster applicant via C3MP during the authentication process for a self-help status update.

**Mitigation:** This privacy risk is mitigated. FEMA provides Individual Assistance disaster applicants with the option to speak with a Human Services Specialist. This allows the individual to verify and update any information during the call. In addition, FEMA automatically routes applicants to a Human Services Specialist after the applicant makes several incorrect/invalid authentication attempts via the self-help functionality. Lastly, data received in the database from the Operational Data Storage is refreshed every six hours. The refresh action ensures the most current data is available.



## Section 3.0 Uses of the Information

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

Survivor and FEMA employee/contractor information in the system is captured and stored as part of audio and screen recordings. The recorded interactions are used to assess the quality of service provided to survivors and employees and to guide training plans and identify other areas for improvement. Interactions include:

- Survivors calling to request assistance or information;
- Employees contacting the Enterprise Service Desk for technical assistance;
- Employees contacting the FEMA Finance Center for support with travel;
- Survivors contacting the FEMA Finance Center for recoupment of grant funds;
- Employees contacting the Individuals and Households Program (IHP) Helpdesk for guidance on policy and procedures;
- Survivors contacting the Enterprise Service Desk for assistance with online account access; and
- Employees contacting survivors to conduct a survey on the level of service provided by FEMA.

Employee/contractor user information is also stored in the system and used for access and administration. Supervisors use the employee or contractor identifying information to assist in coaching, mentoring, counseling, and to otherwise enable employees and contractors to better assist callers.

Survivors' registration ID, date of birth, and last four digits of Social Security Number are used to verify the survivors' identities and the information is queried against the Individual Assistance database for authentication. This information is not collected and stored in C3MP, and C3MP does not have functionality to retain information input by applicants via the phone keypad. This information is automatically cross-referenced (not requiring human involvement) with the applicant file in National Emergency Management Information System that has been collected outside of C3MP.

FEMA's Contract Oversight Management Section personnel use identifying information of FEMA contractors to assess the performance of FEMA and language translation contractors and to improve the quality of responses to survivors. C3MP has the capability to retrieve information based on the phone number used to dial into FEMA. The need to retrieve information based on the dial-in phone number is to identify callers whose calls could be related to threats and attempted fraud. C3MP retrieves this information from the C3MP database.





### **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.**

C3MP has a reporting function that can be used to predict future demand. The program otherwise does not conduct electronic searches, queries, or analyses 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 DHS components with assigned roles within the system.

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

**Privacy Risk:** There is a risk that information could be used in a manner inconsistent with the purpose of collection.

**Mitigation:** This risk is partially mitigated. FEMA mitigates this risk by implementing the following controls: 1) C3MP does not retain the personally identifiable information that the applicant inputs via the telephone keypad; 2) FEMA has limited the personally identifiable information requested from the applicant to only that which is necessary to distinguish with specificity both the applicant and the particular disaster registration for which the status is requested; and 3) when the personal information of applicants stored in C3MP is viewable, the personal information may only be viewed by authorized personnel established through the use of access control limitations explained in Section 8.3 allowing only users with the appropriate user roles, training, and a relevant “need to know” to view the personal information, to include incidentally collected applicant personal information acquired in audio recordings and screen captures. Those portions of the screen-only recordings that are reviewed for workforce quality assessment are archived and held for six years to allow time to resolve any personnel matters that may arise from the use of quality assessment data for employee or contractor performance evaluations or to determine qualifications for continued employment. While personally identifiable information could be displayed in a screenshot of the casework being performed, the personally identifiable information is not stored as individual data that can be extracted from the system. FEMA purges audio and screen recordings that are not used in an evaluation of a FEMA employee or contractor within 45 days. Finally, C3MP does not allow access to recordings by searching applicant personally identifiable information. Additionally, FEMA employees receive training and must abide by the C3MP Rules of Behavior.



## 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.**

All callers receive a message that states: “This call may be monitored and recorded for quality assurance purposes” prior to the caller being connected with a FEMA employee/contractor.

Survivors applying for Individual Assistance receive an automated message prior to connecting to a live Human Services Specialist. Furthermore, if a Human Services Specialist receives a call on which there is more than one survivor on the call, the Human Services Specialist will give notice to all survivors on the same line.

The Privacy Notice is provided in Appendix C.

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

At the beginning of each call, Individual Assistance disaster applicants are presented an automated message stating the call may be monitored and recorded for quality assurance purposes. If not in agreement, the Individual Assistance disaster applicant may refuse to continue and opt-out of the C3MP system by ending the call. The applicant may also choose to opt-out at any time after being connected to a Human Services Specialist by ending the call. If an applicant ends the call, they may apply for assistance or check status online and will not be recorded.

Applicants may opt-out of the recording by choosing to decline to participate in the customer service assessments when they are called back by the Recovery Service Center personnel. FEMA employees/contractors working in specific positions subject to recording in C3MP cannot opt-out of audio recording and screen captures because the recording is a requirement of their position.

FEMA employees or contractors contacting the Enterprise Service Desk may opt-out of the recording in the C3MP system by ending the call.



## 4.3 Privacy Impact Analysis: Related to Notice

**Privacy Risk:** There is a privacy risk that applicants may be unaware of the C3MP use for employee and contractor performance management and evaluation.

**Mitigation:** This risk is mitigated. FEMA manages this risk by providing notice through the DHS/FEMA-002 Quality Assurance Recording System of Records Notice<sup>17</sup> and this Privacy Impact Assessment. FEMA also provides notice to its employees and contractors upon initial training for their position and through user system guides and resources. In addition, FEMA provides notice of call monitoring and recording via an automated message when Individual Assistance disaster assistance applicants call FEMA's Recovery Service Centers via the toll-free number. FEMA employees and contractors who call Individual Assistance and Public Assistance applicants read a scripted privacy notice during the introduction of the call after verifying that the individual is the applicant, co-applicant, or official designated to discuss the matter of the call. Lastly, the website (<https://www.disasterassistance.gov/>) includes a Privacy Notice that will serve notice to disaster assistance applicants applying online that their information may be used for quality assurance purposes.

## Section 5.0 Data Retention by the Project

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

C3MP uses the same approved schedules as its predecessors (Advanced Call Center Network and Quality Assurance Recording System). Records and reports related to and regarding call recordings when an agent is evaluated by FEMA's quality control staff are maintained by FEMA for three years and then transferred to the Federal Records Center and will be destroyed after six years (N1-311-08-1, Item 1). Records and reports related to and regarding unevaluated call recordings, including screen captures, are maintained for 45 days after the date of recording (N1-311-08-1, Item 2).

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a privacy risk associated with C3MP because it may retain the information in the interactive voice response database longer than is necessary.

**Mitigation:** This risk is partially mitigated. FEMA uses National Archives and Records Administration (NARA)-approved retention schedules to retain and eventually dispose of the data. In addition, FEMA leverages training and documentation, such as standard operating procedures, to inform FEMA users of proper record retention standards. The system automatically purges records that reach the forty-five (45) day mark that are not flagged for evaluation, and those that

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<sup>17</sup> See DHS/FEMA-002 Quality Assurance Recording System of Records, 82 FR 32564 (July 17, 2017), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).



are flagged for evaluation are manually purged at the approved NARA records retention time schedule. Every audio and screen recording is assigned an expiration date.

## Section 6.0 Information Sharing

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

FEMA does not routinely share the information within C3MP with any organization outside of FEMA as part of its day to day or emergency operations. However, on occasion, FEMA may need to share information that is in the system with law enforcement, the DHS Office of the Inspector General, and other investigating bodies for the purpose of investigating a violation of law related to FEMA's original purpose for collecting the information.

Any sharing that FEMA may need to initiate will be transmitted electronically in encrypted, password-protected files via secure electronic transmission.

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

Routine use G of the DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS), DHS/ALL-008 Accounts Receivable System of Records, DHS/FEMA-002 Quality Assurance Recording System, DHS/FEMA-008 Disaster Recovery Assistance Files, and DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs System of Records Notices allows FEMA to share information with an appropriate federal, state, tribal, local, international, or foreign law enforcement agency or other appropriate authority charged with investigating or prosecuting a violation or enforcing or implementing a law, rule, regulation, or order, when a record, either on its face or in conjunction with other information, indicates a violation or potential violation of law, which includes criminal, civil, or regulatory violations and such disclosure is proper and consistent with the official duties of the person making the disclosure.

Routine use K of the OPM/GOVT-1 General Personnel Records System of Records Notice allows FEMA to disclose pertinent information to the appropriate federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing a statute, rule, regulation, or order, when the disclosing agency becomes aware of an indication of a violation or potential violation of civil or criminal law or regulation.

Any extraordinary sharing of information by FEMA will be in accordance with the Privacy Act, to include the routine uses published in DHS/FEMA-008 Disaster Recovery Assistance Files noted in Section 1.2 of this Privacy Impact Assessment. Prior to any sharing of personally



identifiable information maintained within C3MP, FEMA ensures that the sharing is compatible with the purpose for which the information was collected and that there is a documented need to know the information by the requestor.

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

Yes. FEMA shares information only if a routine use outlined in the System of Records Notice listed under Section 1.2 above permits disclosure and there is a demonstrated “need to know” the information.

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

Individual requests for survivor disaster assistance records within C3MP are made to the DHS/FEMA Disclosure Office, which maintains the accounting of what records were disclosed and to whom. The process to make the requests is identified in Section 7.1 and in the System of Records Notices identified in Section 1.2.

In addition, the program office, the Recovery Technology Programs Division, keeps a log of requests to obtain survivor call recordings made by law enforcement, Office of the Inspector General, and other investigating bodies.

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

**Privacy Risk:** There is a risk that personally identifiable information in C3MP could be erroneously disclosed or shared with unauthorized recipients.

**Mitigation:** This risk is mitigated. FEMA only shares the information in C3MP within and/or outside of DHS pursuant to the routine uses in the System of Records Notices noted in Section 1.2. FEMA may also share the information in C3MP outside of DHS pursuant to a written request submitted to the FEMA Disclosure Office.

FEMA also manages this risk through training. System-specific privacy awareness training is required for all C3MP users. Users are trained to ensure that the information in C3MP is only shared or disclosed in a manner consistent with the purpose for the collection of the information and consistent with the applicable System of Records Notices covering the specific information that is to be shared or disclosed.

## **Section 7.0 Redress**

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

A survivor may call and connect directly to a live Human Services Specialist who can



verify and update the survivor's contact information. This may include updates to the survivor's address, telephone number, and/or bank account information.

Individuals, including survivors and federal staff, may seek access to their records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Only U.S. citizens, lawful permanent residents, and covered citizens of designated foreign countries or regional economic organization under the Judicial Redress Act (JRA) are afforded access under the Privacy Act. Individuals not covered by the Privacy Act or Judicial Redress Act may still obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. If an individual would like to file a Privacy Act or FOIA request to view their record, they may submit requests electronically at <https://www.dhs.gov/dhs-foia-privacy-act-request-submission-form>. Individuals may also submit requests to the FEMA FOIA Officer by mail, facsimile, or email:

FEMA  
Attn: FOIA Officer  
500 C Street, S.W., Room 840  
Washington, D.C. 20472  
Fax: (202) 646-3347  
[fema-foia@fema.dhs.gov](mailto:fema-foia@fema.dhs.gov)

To conform to the Privacy Act regulations set forth in 6 CFR Part 5, the individual must first verify their identity, including their full name, current address, and date and place of birth. The individual must sign the request. The individual's signature must either be notarized or submitted under 28 U.S.C. § 1746, a law that permits statements to be made under penalty of perjury as a substitute for notarization. In addition, the individual should:

- Explain why they believe FEMA would have the information being requested;
- Specify when the individual believes the records would have been created;
- If the request is seeking records pertaining to another living individual, include an authorization from the individual whose record is being requested, authorizing the release to the requester; and
- Provide any other information that will help the FOIA staff determine which DHS component agency may have responsive records.

Without the above information, FEMA may not be able to conduct an effective search, and the individual's request may be denied due to lack of specificity or lack of compliance with applicable regulations.





Survivors and federal staff may also consult the System of Records Notices listed in Section 1.2 for additional information regarding how to access their respective records using a Privacy Act or FOIA request.

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

C3MP automatically routes survivors to a live Human Services Specialist if the information that the survivor enters cannot be matched by the interactive voice response database to a record in the Operational Data Store. When connected to a Human Services Specialist, the applicant can verify and correct or update their information. Furthermore, survivors applying for Individual Assistance may submit an amendment to their information in accordance with DHS/FEMA-008 Disaster Recovery Assistance Files,<sup>18</sup> and through a Privacy Act request. Other C3MP users may submit an amendment to their information in accordance with OPM/GOVT-1 General Personnel Records;<sup>19</sup> DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS);<sup>20</sup> DHS/FEMA-002 Quality Assurance Recording System of Records;<sup>21</sup> DHS/FEMA-008 Disaster Recovery Assistance Files;<sup>22</sup> and DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs.<sup>23</sup>

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

Applicants are notified of the procedures for correcting their information through this Privacy Impact Assessment and through the System of Records Notices listed in Section 1.2.

Human Services Specialists may be reached using a toll-free number to correct account information. For example, if an applicant realizes that they provided the wrong mailing address, they can call 1-800-621-FEMA and choose the option which will route them to FEMA's "Helpline" group. The applicant is then able to provide the agent with the correct information.

In addition, all notification, record access, and record correction procedures are addressed, outlined, and described in Section 7.1 and the System of Records Notices listed in Section 1.2.

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<sup>18</sup> See DHS/FEMA-008 Disaster Recovery Assistance Files, 87 FR 7852 (February 10, 2022), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>19</sup> See OPM/GOVT-1 General Personnel Records, 77 FR 74815 (December 11, 2012), as modified by 80 FR 74815 (November 30, 2015), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>20</sup> See DHS/ALL-004 General Information Technology Access Account Records Systems (GITAARS), 77 FR 70792 (November 27, 2012), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>21</sup> See DHS/FEMA-002 Quality Assurance Recording System of Records, 82 FR 32564 (July 17, 2017), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>22</sup> See DHS/FEMA-008 Disaster Recovery Assistance Files, 87 FR 7852 (February 10, 2022), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).

<sup>23</sup> See DHS/FEMA-009 Hazard Mitigation Disaster Public Assistance and Disaster Loan Programs, 79 FR 16015 (March 24, 2014), available at [System of Records Notices \(SORNs\) | Homeland Security \(dhs.gov\)](#).



Furthermore, FEMA employees and contractors may request copies of their recordings using the procedure identified in Section 7.1.

## 7.4 Privacy Impact Analysis Related to Redress

**Privacy Risk:** There is a privacy risk that Individual Assistance disaster applicants using C3MP will be unaware of the redress process.

**Mitigation:** This risk is mitigated. C3MP automatically routes applicants to a live Human Services Specialist to verify their information if the information they enter does not return a status record from the Operational Data Store via the self-help option. In addition, this Privacy Impact Assessment and the System of Records Notices listed in Section 1.2 provide notification of the redress process.

**Privacy Risk:** There is a risk that the FEMA employees and contractors do not have adequate redress opportunities to correct, amend, or access their information in C3MP.

**Mitigation:** This risk is mitigated. FEMA employees and contractors whose information is in C3MP are informed of the appropriate redress mechanisms during the required C3MP user training. For example, an employee would notify their supervisor if they found that C3MP contained any erroneous personally identifiable information about them. In addition, this Privacy Impact Assessment and the System of Records Notices listed in Section 1.2 provide notification on 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?

Access to the system is role-based; therefore, FEMA users have access only to the portion of the data required to perform their official duties. FEMA ensures that the practices stated in this Privacy Impact Assessment are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

All FEMA employees and contractors are required to complete initial and annual privacy awareness training. Authorized C3MP users are also trained according to their access rights. All users are required to meet the system-specific privacy awareness training that is administered in a designated training environment.



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

When the personal information of survivors stored in C3MP is viewable, the personal information may only be viewed by authorized personnel with the appropriate user roles, training, and relevant “need to know.”

To gain access to the system, an individual must complete an online access request and sign the C3MP Rules of Behavior. Within the online access request, the individual must document their justification or need to know within the system and have the request approved by their supervisor. The request and Rules of Behavior are submitted to a Recovery Technology Programs Division System Owner, Program Manager, or designee for final approval, account creation, and assignment of role within the system, based on their justification/need to know. This ensures that privacy and information safeguarding requirements are met by limiting access to sensitive information to only those users whose operational role and mission warrants such access. The information within the system is further protected using identification and authentication controls, access control lists, and physical access controls to the Individual Assistance disaster application. FEMA established C3MP standard operating procedures (SOP) to provide additional guidance and an Information System Security Officer (ISSO) who provides security guidance over the project.

### **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, C3MP does not require information sharing agreements or memoranda of understanding; however, the project has a process to review such agreements as necessary. This process involves program stakeholders, Information System Security Officers, the Office of Chief Counsel, and the FEMA Privacy Branch. FEMA does not share personally identifiable information with third parties without final approval of the Privacy Branch. Similarly, FEMA will leverage its stakeholders in the process of reviewing and approving any new uses for the C3MP project. If new uses are contemplated for the C3MP platform or its information, FEMA will update the required privacy compliance documentation.

## **Contact Official**

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Product Support Branch  
Federal Emergency Management Agency



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## Responsible Official

Tammi Hines  
Privacy Officer  
Federal Emergency Management Agency  
U.S. Department of Homeland Security

## Approval Signature

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

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Mason C. Clutter  
Chief Privacy Officer  
U.S. Department of Homeland Security  
(202) 343-1717



## Appendix A

The following five (5) Office of Management and Budget (OMB) information collections and associated forms are used by C3MP:

- OMB No. 1660-0002, “Application /Registration for Disaster Assistance”
  - FEMA Form 009-0-1 Disaster Assistance Registration
- OMB No. 1660-0107, “Public Assistance Customer Satisfaction Survey”
  - FEMA Form 519-0-32 Public Assistance Initial Customer Satisfaction Survey (Phone)
  - FEMA Form 519-0-33 Public Assistance Initial Customer Satisfaction Survey (Internet)
  - FEMA Form 519-0-34 Public Assistance Assessment Customer Satisfaction Survey (Phone)
  - FEMA Form 519-0-35 Public Assistance Assessment Customer Satisfaction Survey (Internet)
- OMB No. 1660-0143, “Federal Emergency Management Agency Individual Assistance Customer Satisfaction Surveys”
  - FEMA Form 519-0-36 Individual Assistance Initial Customer Satisfaction Survey (Phone)
  - FEMA Form 519-0-37 Individual Assistance Initial Customer Satisfaction Survey (Electronic)
  - FEMA Form 519-0-38 Individual Assistance Contact Customer Satisfaction Survey (Phone)
  - FEMA Form 519-0-39 Individual Assistance Contact Customer Satisfaction Survey (Electronic)
  - FEMA Form 519-0-40 Individual Assistance Assessment Customer Satisfaction Survey (Phone)
  - FEMA Form 519-0-41 Individual Assistance Assessment Customer Satisfaction Survey (Electronic)
- OMB No. 1660-0145, “Federal Emergency Management Agency Programs Customer Satisfaction Surveys”
  - FEMA Form FF-104-FY-21-180 (formerly 519-0-44) Programs Preparedness Customer Satisfaction Survey (Phone)



- FEMA Form FF-104-FY-21-181 (formerly 519-0-45) Programs Preparedness Customer Satisfaction Survey (Electronic)
- FEMA Form FF-104-FY-21-182 (formerly 519-0-46) Programs Transitional Shelter Assistance (TSA) Customer Satisfaction Survey (Phone)
- FEMA Form FF-104-FY-21-183 (formerly 519-0-47) Programs Transitional Shelter Assistance (TSA) Customer Satisfaction Survey (Electronic)
- FEMA Form FF-104-FY-21-183 (formerly 519-0-48) Programs Temporary Housing Units (THU) Customer Satisfaction Survey (Phone)
- FEMA Form FF-104-FY-21-184 (formerly 519-0-49) Programs Temporary Housing Units (THU) Customer Satisfaction Survey (Electronic)
- OMB No. 1601-0029, “Generic Clearance for Improving Customer Experience- OMB Circular A-11-FEMA”
  - FEMA Form FF 104-009-FY-21-108 FEMA Customer Experience (CX) Survey





## Appendix B

The following terms are used throughout this document, to identify the parties involved when someone contacts FEMA using C3MP:

- **Survivor:** Used to describe an individual who has been impacted by a Disaster and is contacting FEMA with questions or to apply for disaster assistance. A survivor could also be considered an “Applicant” or “Disaster Assistance Applicant.”
- **Caller:** Not every individual contacting FEMA through C3MP are survivors. The C3MP platform also serves employees requiring technical assistance from the Enterprise Service Desk (ESD), citizens contacting FEMA through one of the main contact numbers for general questions, employees seeking travel assistance through the FEMA Finance Center (FFC). The term “caller” is used to describe those who would experience or be impacted by more general capabilities of the system, consistent across all lines of business, and not just those who are disaster survivors. A “caller” would include any individual, including a survivor, employee, and contractor accessing C3MP.
- **Employees/Contractor:** FEMA employees utilizing the C3MP Platform to seek technical support, administrative assistance, or official travel support.



## Appendix C

As indicated in Section 4.1 of this Privacy Impact Assessment, the following pre-recorded and automated privacy notice is provided to the Individual Assistance survivor when the survivor's call is connected to C3MP.

“FEMA is required to provide you with the following statement:

The Privacy Act of 1974 protects your rights as to how FEMA uses and shares your information with entities such as states, tribes, local governments, and other organizations. The Stafford Act and other laws allow FEMA to collect information to determine eligibility and provide assistance as a result of a Presidentially declared disaster. If you receive FEMA assistance and your insurance covers the same loss, you may be required to return some or all of the FEMA assistance you received. To be eligible for assistance, you must declare under penalty of perjury, that you or someone in your household is a citizen, non-citizen national, or a qualified alien of the United States. If you hide information or lie in an attempt to obtain assistance, it is a violation of federal and state laws, which carry criminal and/or civil penalties. You authorize FEMA and/or the State, Tribe, or local government to verify all the information you provide and request documentation from your insurance company or other third parties to determine your eligibility for assistance.”