**Privacy Impact Assessment Update
for the**

Web-IFMIS (Integrated Financial Management Information System)

DHS/FEMA/PIA-020(b)

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Abstract

The U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Mission Support Bureau (MSB), Office of the Chief Financial Officer (OCFO) operates the Web Integrated Financial Management Information System (Web-IFMIS), the official accounting and financial system used for internal and external financial reporting. FEMA is publishing this Privacy Impact Assessment (PIA) update to discuss the relationship between the Emergency Support System (ES) and Web-IFMIS and the collection of Individual Assistance (IA) data, which involves the collection of Social Security numbers from disaster assistance applicants.

Overview

In the PIA published on August 16, 2013,[1] the Federal Emergency Management Agency (FEMA) described the Agency's use of the Web Integrated Financial Management Information System (Web-IFMIS). Web-IFMIS is a FEMA financial management system responsible for controlling and monitoring FEMA's funds and external financial interfaces. The PIA published describes Web-IFMIS as FEMA's official accounting and financial management system that tracks all of FEMA's financial transactions. Web-IFMIS does not collect information directly from individuals; the information contained in the system is pulled from other systems. Web-IFMIS provides FEMA's financial managers with a global view of all FEMA's financial systems. Web-IFMIS uses information provided through these various subsystems in order to make payments to entitled groups (grantees), FEMA employees for payroll and travel reimbursement, and contractors and other vendors for payment of services. Web-IFMIS is also used to account for the expenditure of public funds as mandated under various statutes, regulations, Executive Orders, Office of Management and Budget guidance, and DHS and FEMA policies.

The Emergency Support System (ES) serves as the primary interface between Web-IFMIS and the National Emergency Management Information System Individual Assistance (NEMIS-IA).[2] ES is a module within NEMIS-IA designed to create funding requests and Individual Assistance (IA) disaster obligations, and to view mission assignments and commitments sent by the FEMA Enterprise Coordination and Approvals Processing System (eCAPS)[3] for approval or rejection. ES pre-processes financial transactions including allocations, commitments, obligation

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[1] DHS/FEMA/PIA-020(a) Web-IFMIS (Integrated Financial Management Information System) (August 16, 2013), *available at* https://www.dhs.gov/publication/dhsfemapia-020a-web-ifmis-integrated-financial-management-information-system.

[2] More information on NEMIS-IA can be found in DHS/FEMA/PIA-049 Individual Assistance Program, *available at* https://www.dhs.gov/sites/default/files/publications/privacy-pia-fema-049-ia-january2018.pdf.

[3] More information on eCAPS is *available at* https://www.dhs.gov/publication/dhsfemapia-023-enterprise-coordination-and-approval-processing-system-ecaps.

of funds, mission assignments to other external agencies during disasters, and payment requests from NEMIS-IA modules.

Reason for the PIA Update

The original Web-IFMIS PIA documented the collection and use of information in the system, but did not describe the Web-IFMIS and ES relationship or the PII sent to Web-IFMIS by ES. This PIA update discusses the relationship between ES and Web-IFMIS and the collection of Individual Assistance (IA) data, specifically the collection of Social Security numbers (SSN) from disaster assistance applicants.

ES interfaces to Web-IFMIS using File Transfer Protocol format, meaning ES sends files to a server location that Web-IFMIS then imports. Web-IFMIS validates each transaction for funds availability and will accept or reject a transaction and return either an "accept reply" or a "reject reply" listing. A "reject reply" listing is the Web-IFMIS error message. A Web-IFMIS "accept reply" listing that is returned to ES updates the transaction status as accepted and notifies the program user that funds are available to award or a commitment has been reviewed or Mission Assignment accepted in Web-IFMIS. Web-IFMIS accept or reject reply listings returned to ES are electronically routed back to the NEMIS-IA submitter.

ES performs the following functions:

- **Individual Assistance (IA) Housing Obligations:** ES creates a standardized IA Obligation template that IA Program staff complete when funding increases or decreases are necessary for each IA grant category of assistance. Financial information taken from the template is then formatted into a file and sent to Web-IFMIS. A completed template contains the names and dates of the submitter (IA Program Lead) and approver (Federal Coordinating Officer), but no PII is sent to Web-IFMIS. The template is available to Regional IA Program staff authorized by each Region to request programmatic funds by grant category of assistance such as Rental Assistance or Other Needs Assistance. The completed template remains in an electronic active state until the program increases, decreases, or de-obligates the template for the current fiscal year.

- **Disaster Housing Payments**: Disaster survivor applicants deemed eligible for housing assistance receive housing payments from the IA Program. OCFO FEMA Finance Center (FFC)-authorized Certification Officers are able to view payment requests for review and certification through the ES interface, which also includes a link to the NEMIS-IA system in which the applicant's information is stored. Individual disaster applicant information includes the IA applicant's SSN; the applicant's name; the applicant's contact information; the applicant's financial and debt information; and the applicant's bank account and routing

numbers. ES transmits disaster assistance applicant information to Web-IFMIS via a secured file, and Web-IFMIS then sends disaster assistance applicant data to the Department of the Treasury in order for Treasury to mail or electronically transfer a payment to an applicant.

- **Requests for Allocation Advice (RAA):** A RAA is a standardized template for each program that lists the program's Budget Object Codes (BOC) and allows the program to submit funding requests to Web-IFMIS. ES limits each program to BOCs applicable to their program, meaning that ES users are only able to submit funding requests for their specific program. No PII data is collected or transmitted to Web-IFMIS.

- **Mission Assignments:** Mission Assignment information is created, routed, and approved in eCAPS. FEIMS-authorized OCFO staff review this information in ES and, if the assignment is rejected, provide comments that are sent back to eCAPS. If approved, a file is created and sent to Web-IFMIS. No PII data is collected or transmitted to Web-IFMIS.

- **Review of Commitments:** Request for Commitment information is created, routed, and approved in eCAPS. FEIMS-authorized OCFO staff review this information in ES and, if the assignment is rejected, provide comments that are sent back to eCAPS. If a commitment is rejected, comments are returned to eCAPS, and if approved, a file is created and sent to Web-IFMIS. No PII data is collected or transmitted to Web-IFMIS.

Privacy Impact Analysis

Authorities and Other Requirements

There are no changes to the authorities identified or Paperwork Reduction Act requirements since the publication of the PIA in 2013. However, in addition to data retention described in the PIA published in 2013, the records retention schedule for NEMIS-IA information maintained in Web-IFMIS has been approved by the FEMA Records Officer and National Archives and Records Administration as Authorities N1-311-86-001, Item 4C10a. NEMIS-IA information maintained in Web-IFMIS must be retired to inactive storage when 2 years old, and destroyed when 6 years, 3 months old.

Web-IFMIS was granted an Authority to Operate (ATO) on December 30, 2015. The ATO was recertified on December 21, 2017 and expires on December 21, 2018.

The System of Records Notices (SORN) referenced in the original Web-IFMIS PIA continue to provide coverage for the information maintained in the system, including the additional PII elements discussed in this PIA Update.

Characterization of the Information

In addition to the information described in the original PIA, Web-IFMIS receives information about disaster survivor applicants. The following information is embedded in the files sent to Web-IFMIS from the NEMIS-IA system via ES in order to process disaster assistance payments:

- Applicant SSN;
- Applicant name;
- Applicant contact information;
- Financial/debt information pertaining to applicant; and
- Applicant's bank account and routing numbers.

Privacy Risk: ES could pass on inaccurate data to Web-IFMIS because it is sending data that is not collected directly by ES, but rather data that is collected by NEMIS-IA. If the data collected by NEMIS-IA is inaccurate, the data ultimately transmitted to Web-IFMIS may also be inaccurate.

Mitigation: This privacy risk is mitigated because NEMIS-IA collects information directly from individuals, and FEMA verifies applicant PII throughout the application process and provides opportunities for disaster assistance applicants to review and correct their information before and after submitting it. FEMA sends each applicant a hard copy printout of their application, thus allowing the applicant to review their records and identify any errors. In addition, FEMA offers applicants multiple methods of correcting any discrepancy in their data so that FEMA will properly process their applications, such as making edits to their data via http://www.disasterassistance.gov or by contacting a National Processing Service Center representative via FEMA's toll-free assistance hotline.

Uses of the Information

The majority of the data sent to Web-IFMIS via ES is detailed programmatic allocation activity at the Budget Object Code (BOC) level, which Web-IFMIS summarizes. This information does not contain any PII. This information allows managers to better align their forecasted spend plans to actual expenditures and make adjustments. Although Web-IFMIS is FEMA's official financial system performing all 'funds availability' edits,[4] ES prevents an individual program from obligating or committing funds not previously vetted during the detailed allocation review and approval process. This ensures both the Program and OCFO manage funding at the allocation and obligation level and return all un-used funds to the current year appropriation.

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[4] Web-IFMIS ensures that funds are available at the allocation and obligation to ensure adequate funding is available to process a specific transaction. For example the amount of the de-obligation request must be equal to or less than the unliquidated obligation balance remaining in Web-IFMIS.

The only PII sent to Web-IFMIS via ES is disaster assistance applicant information. ES transmits disaster assistance applicant information to Web-IFMIS so that Web-IFMIS can process disaster assistance payments. A FEMA employee will open the ES module and access the disaster assistance applicant information via a link to NEMIS-IA. Applicant information is not stored in ES; rather, ES provides a way for the FEMA employee to view the data in NEMIS-IA and turn it into a transmittable file format. The survivor data is sent by ES to Web-IFMIS via a secured file, and Web-IFMIS then sends disaster assistance applicant data to the Department of the Treasury in order for Treasury to mail or electronically transfer a payment to an applicant. In order to carry out this process, FEMA must be able to verify an applicant's identity with a valid SSN. By verifying identity, FEMA prevents fraud and ensures applicants receive the disaster assistance intended for them. In addition, Treasury will use the SSN to verify whether the applicant owes any previous outstanding debts to the government.

Privacy Risk: The IA information received by Web-IFMIS could be used for purposes other than those for which the information was collected.

Mitigation: This privacy risk is mitigated in several ways. First, FEMA limits its data collection to only that which is required to process disaster assistance applications, so there is no extraneous data shared. Secondly, Web-IFMIS does not transfer data from one component module to another. Web-IFMIS only uses this data to send to Treasury in order for Treasury to mail or EFT a payment to an applicant. This data is not available to Web-IFMIS user community, reported, or provided to another application. Web-IFMIS payments are not reported at the individual applicant level. Web-IFMIS aggregates all payments as a single expense against the obligation. FEMA also limits access to Web-IFMIS to authorized users whose access is based on their roles and responsibilities and who have signed Rules of Behavior documentation.

Notice

In addition to the notice described in the PIA published in 2013, the publication of this PIA update provides additional public notice that Web-IFMIS receives and uses disaster applicant information from NEMIS-IA via ES.

Data Retention by the project

In addition to the data retention described in the PIA published in 2013, the records retention schedule for the IA information maintained in Web-IFMIS has been approved by the FEMA Records Officer and NARA as Authorities N1-311-86-001, Item 4C10a. IA information maintained in Web-IFMIS must be retired to inactive storage when 2 years old, and destroyed when 6 years, 3 months old.

Privacy Risk: There is risk that IA information maintained in Web-IFMIS may be retained for a longer period than necessary and not in accordance with the NARA-approved record schedule.

Mitigation: This risk is mitigated because FEMA follows all pertinent records schedules discussed in the PIA published in 2013 and this section. The FEMA Records Branch provides trainings to inform FEMA programs of proper record retention, disposition requirements, records inventory training, file plan training, and file structure training to ensure that FEMA personnel are aware of the National Archives' requirements. Program staff review records on a monthly basis in order to delete records in accordance with their retention schedules.

Information Sharing

The original PIA describes the internal and external sharing. There are no new disclosures as a result of this update.

Redress

No changes have been made regarding the access, redress, and correction procedures since the PIA published in 2013.

Auditing and Accountability

The original PIA describes FEMA's auditing of Web-IFMIS and all processes related to ensuring accountability. No changes have been made since the PIA published in 2013.

Responsible Official

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Approval Signature

[Original, signed copy on file with the DHS Privacy Office]

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