



Privacy Impact Assessment
for the

Federal Insurance and Mitigation Administration (FIMA) Risk
Insurance Division (RID) Underwriting and Claims Operation
Review Tool (U-CORT)

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Abstract

The Federal Emergency Management Agency's (FEMA) Federal Insurance and Mitigation Administration (FIMA) Risk Insurance Division (RID) owns and operates the Underwriting and Claims Operation Review Tool ("U-CORT" or "Tool"). The RID U-CORT is a modernization of previously manual oversight mechanisms to improve the management of the National Flood Insurance Program (NFIP) underwriting and claim loss adjustment process. This Privacy Impact Assessment (PIA) documents how U-CORT collects, uses, disseminates, and maintains personally identifiable information (PII) of NFIP policy holders associated with underwriting and claim operation reviews.

Overview

Congress created the NFIP through the National Flood Insurance Act of 1968 (NFIA).¹ FIMA manages the NFIP and oversees the floodplain management and mapping components of the NFIP. Homeowners, renters, and businesses can purchase flood insurance from the NFIP through the FEMA NFIP Direct Servicing Agent (DSA) contractor on behalf of FIMA, and through Write Your Own (WYO) companies that sell and service flood insurance policies. WYOs may contract or purchase the services of flood vendors to handle the administrative functions of servicing flood insurance.

WYO's flood insurance policy and claims operations are required to be reviewed at least once every 3 years (triennially) in accordance with the NFIP WYO Program's Financial Control Plan Requirements and Procedures (FCPRP).² FIMA initiates NFIP underwriting and claims operation reviews to ensure WYOs and the NFIP DSA comply with federal statutes, policies, and procedures for flood insurance underwriting and claims processes. This review process conducts a thorough examination of sample policy (underwriting operation) and claim (claims operation) files at each WYO, flood vendor, and the NFIP DSA to measure the quality of flood policy and claims investigations, adjustments, and supervision. All WYO companies, flood vendors, and the NFIP DSA must adhere to the standards and procedures outlined in the FCPRP to ensure financial and statistical control over their flood insurance activities.

The FIMA RID Underwriting Branch Insurance Examiners review the underwriting activities of WYO companies, flood vendors, and the NFIP DSA. The purpose of these reviews is to evaluate the procedures used to process NFIP applications, declinations, and cancellations; underwrite/endorse policies; renew policies; and execute other underwriting activities.

FIMA developed U-CORT to provide organization, automation, and integration of underwriting and claims operation review data and report development. The application is used by Insurance Examiners in the Underwriting Branch and the Claims and Appeals Branch.

¹ 42 U.S.C. § 4001, *et. seq.* (<http://www.gpo.gov/fdsys/pkg/USCODE-2004-title42/html/USCODE-2004-title42-chap50-sec4001.htm>).

² NFIP WYO Program FCPRP, *available at*, <http://bsa.nfipstat.fema.gov/manuals/fcp99jc.pdf>.



Through U-CORT Insurance Examiners and RID leadership are able to:

- Set sampling parameters;
- Communicate through secure internal messaging and email with the NFIP Information Technology System (ITS) administrators for sample requests (*See Sample Selection for more detail*);
- Perform underwriting and claims operation reviews and document discrepancies electronically within the application;
- Communicate through secure internal messaging and email with the WYO companies, flood vendors, and NFIP DSA to clarify open errors;
- Draft and submit the final reports internally and to WYO companies, flood vendors, and the NFIP DSA; and
- Conduct trend analysis, post-review follow-up activities, and executive dashboard reporting.

U-CORT does not collect or maintain any additional PII beyond what it receives from the NFIP ITS.³ U-CORT collects this data from the NFIP ITS to verify the accuracy of NFIP flood insurance policies and claims, to prevent fraud, and for the oversight and management of the NFIP. U-CORT does not interact directly with NFIP policyholders. The application uses some of the information already collected and stored by NFIP ITS to continue to provide oversight of the NFIP. The U-CORT application does not collect, receive, or share PII with any other Department of Homeland Security (DHS) systems.

The U-CORT application is web-based and uses internet hosting services from the federal data center located at the NFIP Virtual Information Technology System (NVITS) General Support System (GSS), which received an Authority to Operate (ATO) by the FEMA Chief Information Officer (CIO) on January 30, 2014.

Typical U-CORT Application Transaction:

U-CORT consists of the following five general functions: user account creation, scheduling for reviews, request of policy and claims sampling for review, review of operations and claims files, and final report creation and review.

³ NFIP ITS is covered by the DHS/FEMA/PIA-011 National Flood Insurance Program Information Technology System PIA, *available at*, http://www.dhs.gov/sites/default/files/publications/privacy/privacy_pia_fema_nfipits_10122012.pdf; the DHS/FEMA-003 National Flood Insurance Program Marketing Files SORN, *available at*, <https://www.federalregister.gov/articles/2014/05/19/2014-11386/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-003-national>; and DHS/FEMA/NFIP/LOMA-1 National Flood Insurance Program (NFIP); Letter of Map Amendment (LOMA) SORN, *available at*, <http://www.gpo.gov/fdsys/pkg/FR-2006-02-15/html/E6-2122.htm>.



1. User Account Creation:

A FEMA Insurance Examiner or other individual requiring access to U-CORT accesses the U-CORT homepage and submits a “Request for Access” form. The request is reviewed by a RID supervisor or the U-CORT system owner, who verifies the requester’s “need-to-know” and approves system access account creation. The system administrator then creates the user account with the information submitted and assigns roles and access to either the underwriting or claims review module. System administrators and RID supervisors have access to both modules. A temporary password is created and sent to the user via email. The user logs into his or her account with his or her temporary password and is required to create a new password. WYO companies, flood vendors, and NFIP DSA representatives only access information related to their respective company or organization. Access is limited to read-only rights and users can not add to or update information directly within U-CORT.

2. Schedule Creation for Reviews:

The RID Branch Chief/Managing Examiner logs into U-CORT and establishes the operation review calendar for each fiscal year by scheduling operation reviews in the U-CORT Calendar Process Cycle to start the U-CORT process. The Branch Chief/Managing Examiner can schedule his or her operation review calendar for the current fiscal year and the next two fiscal years. The Branch Chief/Managing Examiner selects the specific WYO, flood vendor, or the NFIP DSA to be reviewed, the start and end dates for the review, and the names of the supporting insurance examiners who will be performing the review when scheduling each operation review. A record is created in U-CORT and a sample selection request is automatically created for that review after an operation review is submitted. The Branch Chief/Managing Examiner can amend the operation review calendar as needed throughout the year.

3. Sample Selection:

The RID Branch Chief/Managing Examiner sets the sampling parameters for the policy or claim information needed for the review process and submits the request for posting within U-CORT after scheduling the operation review calendar (roughly 60 days in advance of the scheduled review date). The sampling parameters include the specific sample date range, number of files to retrieve, and the specific WYO company, specific flood vendor, or the NFIP DSA. U-CORT generates an alert in a secure email to the NFIP ITS Contracting Officer’s Representative (COR). The NFIP ITS COR uses the link provided in the email alert and logs into U-CORT. The COR then reviews the request, assigns an NFIP ITS team member to the request, and approves the sample request once in the application. U-CORT generates an alert in a secure email to the assigned NFIP ITS team member upon approval. The NFIP ITS team member uses the link provided in the email alert to access the U-CORT log-in page and enters his or her unique user ID and password. After the team member logs in to U-CORT, he or she reviews the sample request criteria. The NFIP ITS team member then accesses the NFIP ITS



system using FEMA issued equipment and runs a query to retrieve the requested sample data, exports the sample data to a password protected and encrypted Microsoft (MS) Excel file, and uploads the sample data to U-CORT through an encrypted transmission. The sample data is stored in the U-CORT database and the NFIP ITS team member deletes the MS Excel file from his or her workstation. The sample data is used to review flood insurance policy and claims hardcopy files on site at WYOs, flood vendors, and the NFIP DSA locations.

4. File Review:

FEMA's Insurance Examiners compare the sample data within U-CORT to the corresponding policy and claim files to verify the accuracy of the claim and underwriting data during the site visit. The examiner uses a general review checklist during the review of each file as a uniformed guide. This checklist contains error information related to policy or claim files. PII (policy holder name and property address) is included on the page that contains the checklist. Errors are recorded and a percentage rating is assigned for the file within U-CORT. FEMA bases the overall WYO company, flood vendor, or NFIP DSA rating on an average error percentage of all the files reviewed. An overall error percentage greater than 20 percent will be the basis for an unsatisfactory rating within U-CORT.

5. Report Development and Review:

A detailed report with references to specific insurance policies is generated so that confirmed errors may be immediately corrected by the WYO company, flood vendor, or NFIP DSA after the final review. The report is released to the Branch Manager/Managing Examiner after completion for review and approval. The Branch Manager/Managing Examiner shares the report with the WYO company, flood vendor, or NFIP DSA point of contact (POC) following approval. U-CORT creates an alert and sends a secure email to the POC, who reviews the report with the option of providing a rebuttal to the findings presented in the report. Reports are viewed and finalized by RID. RID may conduct trend analysis to evaluate performance and common errors over time to improve performance. Information collected by U-CORT is retained and disposed of pursuant to the National Archives and Records Administration's (NARA) guidance and regulations.

The primary privacy risk for U-CORT is that flood insurance policyholders are not aware of U-CORT's collection, use, and sharing of their PII. FEMA has taken steps to mitigate this risk by publishing this PIA, which provides transparency into the types of information being collected by U-CORT, how the information is used, and who may have access to the information.

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?

Congress created the NFIP through the National Flood Insurance Act (NFIA), and



subsequently reformed NFIP through the Flood Insurance Reform Act (FIRA) of 2004,⁴ which establishes legal authority for the NFIP and authorizes NFIP to enter into contracts, agreements, or other appropriate arrangements with insurance companies and other insurers as needed to obtain their services in execution of NFIP. The NFIA allows NFIP to maintain such records as necessary to facilitate an effective review. The WYO program establishes the annual agreement, with which every WYO company must comply, and provides guidance for compliance with the FCPRP.

FIRA⁵ reformed the NFIP and the terms of the NFIA. FIRA's purpose is to reduce losses to properties receiving multiple claim payments.

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

All information collected and stored within the U-CORT system is consistent with the DHS/FEMA-003 National Flood Insurance Program (NFIP) Files SORN⁶ which applies to the U-CORT system's collection and storage of flood insurance information. U-CORT is also covered by the DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) SORN,⁷ which allows U-CORT to collect and store user access information for individuals seeking and obtaining access to the system.

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

U-CORT is a minor application of the FEMA NFIP Virtual Information Technology System (NVITS) General Support System (GSS). A security plan (SP) was completed for the NVITS GSS and an ATO for the NVITS GSS was granted on January 30, 2014. U-CORT is compliant with DHS Directive 4300A⁸ and applicable National Institute of Standards and Technology (NIST) policies and procedures.

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

Yes. The records retention schedule was approved by the FEMA Records Officer and NARA as General Records Schedule (GRS) 20, item(s) 1a and 12a;⁹ and GRS 24 item 6.¹⁰

⁴ Pub.L. 108-264, available at, <http://www.fema.gov/media-library-data/20130726-1748-25045-4942/fira2004.pdf>.

⁵ 42 U.S.C. § 4001, et. Seq., available at, <http://www.gpo.gov/fdsys/pkg/USCODE-2004-title42/html/USCODE-2004-title42-chap50-sec4001.htm>.

⁶ DHS/FEMA-003 - National Flood Insurance Program Marketing Files, 79 FR 28747 (May 19, 2014), available at, <https://www.federalregister.gov/articles/2014/05/19/2014-11386/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-003-national>.

⁷ DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) 77 FR 7092 (November 27, 2012), available at, <http://www.gpo.gov/fdsys/pkg/FR-2012-11-27/html/2012-28675.htm>.

⁸ DHS Sensitive Systems Policy Directive 4300A, available at, http://www.dhs.gov/xlibrary/assets/foia/mgmt_directive_4300a_policy_v8.pdf.

⁹ <http://www.archives.gov/records-mgmt/grs/grs20.html>.



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.

U-CORT is not subject to the requirements of the Paperwork Reduction Act (PRA) because a specific form or other information collection tool completed by the public is not used to populate the information in the system.

Section 2.0 Characterization of the Information

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

U-CORT collects, uses, maintains, retrieves, and disseminates the following information:

Policyholder and Policy Information

- Full Name (First, Middle, Last)
- Insured Property Address
- Home Mailing Address
- Policy Premium Amount
- Allocated Loss Adjustment Expense Amounts
- Actual Cash Values of Building and Contents
- Coverage Information
- Deductible Information
- Reason for Policy Closing Without Payment
- Applicable Policy Dates
- Fees and Numbers
- Program Types
- Replacement Cost Values
- Risk Rating Methods
- Rollover Indicators
- Previous Loss Amounts Paid
- Date of Loss
- Water Damage Information
- Insurance Coverage
- Deductible Amount
- Claim Payment Information

¹⁰ <http://www.archives.gov/records-mgmt/grs/grs24.html>.



- Flood Risk Zone
- Participating Flood Community Name
- Building or Residence Location
- Construction Details
- Contents Details (machinery, equipment, and other items inside individual homes or businesses that could be damaged by flooding)

Insurance Company Information

- WYO Company Name
- WYO Company Unique Identifier (assigned by FEMA)

System User Account information (including user accounts for WYOs, flood vendors, and NFIP DSA users)

- Full Name
- User Identification
- User Password
- Email Address
- Phone Number

Operation Review Rating

- Assigned Review Rating (Satisfactory or Unsatisfactory)

The determination for a *Satisfactory* or *Unsatisfactory* rating is based on an overall error percentage from the results of the operation review. The errors identified in a policy file are either *Critical* or *Non-Critical*. One or more *Critical* errors identified in a policy file constitute one error when developing the overall error percentage. Additionally, three or more *Non-Critical* Errors equals a *Critical* error. The system automatically determines the error percentage and develops a rating based on the aggregate results of the policy files reviewed.

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

Information in the U-CORT system is obtained directly from the NFIP ITS or the Insurance Examiners that conduct the underwriting operation reviews and claims operation reviews (e.g., working notes, review results). Data obtained from the NFIP ITS is exported to an MS Excel file and the file is uploaded to U-CORT manually by NFIP ITS staff. Additionally, WYO companies, flood vendors, and the NFIP DSA may upload relevant documentation in response to errors identified during the operation review process once the final report is released.

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.



2.4 Discuss how accuracy of the data is ensured.

Data maintained in U-CORT are uploaded from the NFIP ITS and therefore the accuracy of the data is dependent on the accuracy of information within the NFIP ITS. During the review process inconsistencies identified between the WYO company, flood vendors, or the NFIP DSA hardcopy files and the NFIP ITS are noted within U-CORT. For example, if the property addresses do not match, the Insurance Examiner will note the discrepancy in U-CORT, which is then reflected in the final report issued to the WYO company, flood vendor, or the NFIP DSA that is responsible for resolving the discrepancy.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that U-CORT contains inaccurate information related to flood insurance policies, including PII of policyholders.

Mitigation: This privacy risk is managed because FEMA exports data from the NFIP ITS to an MS Excel file that is uploaded manually by an NFIP ITS team member. No data entry occurs during the sample file upload process. The Insurance Examiner reviews the data to ensure accuracy and identifies and notes any inconsistencies within the system. Inconsistencies are provided to the WYO company, flood vendor, or NFIP DSA who takes corrective action to correct discrepancies or other errors within their records or the FEMA NFIP ITS system. WYO companies, flood vendors, and the NFIP DSA only review information in U-CORT and cannot add or change information directly into the system.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

U-CORT collects policy and claims information from the NFIP ITS and compares it with hard copy policy and claims files located at the WYO company, flood vendor, and NFIP DSA site(s). Using U-CORT replaces a manual process that is needed to ensure WYOs, flood vendors, and the NFIP DSA comply with appropriate flood insurance statutes and regulations as mentioned in section 1.1.

U-CORT also collects information from WYO companies, flood vendors, the NFIP DSA, and FEMA staff to create user accounts within the system. This information is required for system access, auditing, and accountability.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No. U-CORT does not use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate predictive patterns or anomalies. FEMA uses the



data returned by this technology to identify error trends and performance issues by WYO insurance companies, flood vendors, and the NFIP DSA. This helps FEMA determine whether to approve continued participation in the WYO Program by these WYO companies and flood vendors.

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

No.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that data within U-CORT is used for an unintended or unauthorized purpose.

Mitigation: This privacy risk is managed by only collecting information for auditing and oversight (as required by federal statutes and regulations listed in Section 1.1) and user account creation as required for system auditing and user accountability. U-CORT is used by only designated FEMA staff and FEMA does not allow other DHS components to access U-CORT. Other users of U-CORT include WYO and flood vendors; however, their access and review of records is restricted to their respective company's information that is necessary based on individual roles and responsibilities within the system.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

FEMA provides notice to individuals through this PIA and the associated SORNs mentioned in Section 1.2 that provide public notice of the system's collection, use, dissemination, or maintenance of PII. The NFIP ITS PIA provides additional notice of FEMA's use of NFIP policy information.

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

WYO companies, flood vendors, and the NFIP DSA POC cannot decline the use of their information by FEMA to conduct operation and claims reviews because WYO operation reviews are required by the NFIA. An individual may choose to not provide information; however, doing so may disqualify them from the program. Additionally, the WYO program is governed by the NFIP Financial Control Plan, which provides guidance for participating insurance companies to assist in their compliance with the requirements in the Financial Control Plan.

4.3 Privacy Impact Analysis: Related to Notice



Privacy Risk: There is a risk that individuals are not given sufficient notice regarding the use of their information in U-CORT.

Mitigation: FEMA manages this risk through publication of this PIA and the SORNs mentioned in Section 1.2 that provides public notice of the system collection, use, dissemination, and/or maintenance of PII. Additionally, the DHS/FEMA/PIA-011 National Flood Insurance Program Information Technology System (NFIP ITS) PIA¹¹ provides additional notice of FEMA's use of NFIP policy information.

Section 5.0 Data Retention by the project

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

In accordance with NARA General Retention Schedule (GRS) 20, item 1a, sample file data consists of electronic records of claims and policy files obtained manually from the NFIP ITS and is retained for 15 years to support the evaluation of the claims and underwriting functions of WYO companies, flood vendors, and the NFIP DSA and the remediation of observed errors. This data are disposed when FEMA determines that they are no longer needed for administrative, legal, audit, or other operational purposes.

In accordance with NARA GRS 20, item 12a, operation and claims review results data consists of derived data (*Satisfactory* or *Unsatisfactory* determination) used for analysis and review of the historical performance of WYO companies, flood vendors, and the NFIP DSA and trends in common errors, is retained for as long as necessary to support FEMA with allocating resources more efficiently to address persistent errors. The data are disposed of when FEMA determines that they are no longer needed for administrative, legal, audit, or other operational purposes.

In accordance with NARA GRS 24, item 6, records pertaining to system access are securely retained until inactive. Inactive records are destroyed or deleted 6 years after the user account is terminated or password is altered, or when no longer needed for investigative or security purposes, whichever is later.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that policyholder information (including PII) is retained for a period longer than necessary.

Mitigation: FEMA manages this risk through the performance of periodic reviews of files maintained by U-CORT to determine if any information is no longer needed for audit or administrative purposes. For instance, FEMA may need the results or responses of operation reviews longer than the flood insurance policy information supporting the results. Any information that is no longer necessary for retention is disposed of in accordance with the appropriate NARA records retention schedule. Furthermore, all FEMA employees (including

¹¹ DHS/FEMA/PIA-011 National Flood Insurance Program Information Technology System (NFIP ITS) PIA, available at, http://www.dhs.gov/sites/default/files/publications/privacy/privacy_pia_fema_nfipits_10122012.pdf.



the U-CORT system owner) are required to take DHS records management and privacy training annually.

Section 6.0 Information Sharing

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

Yes. U-CORT information is shared outside of DHS as part of NFIP's normal operations. Final reports are generated by FEMA Insurance Examiners in U-CORT and shared electronically with the WYO companies, flood vendors, or the NFIP DSA being reviewed. The WYO company, flood vendor, or the NFIP DSA POC provides its information for user account creation and access and the POC logs in to U-CORT to view the final reports. The WYO companies, flood vendors, or the NFIP DSA have the opportunity to provide rebuttals or correct confirmed errors in the policies. In some instances the company uses this information to improve its overall flood insurance operations.

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

Routine Use H of the DHS/FEMA-003 NFIP Files SORN allows DHS/FEMA to share information with WYO companies, flood vendors, and the NFIP DSA for the purposes of administering and auditing the NFIP. All of the information enumerated in Section 2.1 of this PIA with the exception of "System User Account Information" is required in order to identify and review policy and claims files. Errors must be shared with respective insurance companies in order to ensure they are corrected.

6.3 Does the project place limitations on re-dissemination?

Re-dissemination of policy and claims information is largely governed by the individual's agreements with his or her insurance companies. However, information is not re-disseminated outside of the FEMA, WYO companies, flood vendor, and the NFIP DSA. Language restricting re-dissemination is included on the final report documents produced using U-CORT.

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

FEMA's Records Management Division tracks and records all requests and disclosures of information pursuant to Freedom of Information Act (FOIA) and Privacy Act (PA) requests. U-CORT also keeps a detailed log of all users' activity while accessing the system.



6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information within U-CORT may be erroneously disclosed outside of DHS.

Mitigation: FEMA manages this risk by only sharing information outside of the Department as permitted by the SORNs mentioned in Section 1.2 and as documented in this PIA. Information is not re-disseminated outside of the FEMA, WYO companies, flood vendor, and the NFIP DSA relationship. Language restricting re-dissemination is included on the final report documents produced using U-CORT. Access to U-CORT is extremely limited and role-based access will be granted only for those individuals who need to know the information to perform their jobs. Sharing of information is tracked by FEMA's Records Management Division and the U-CORT system.

Section 7.0 Redress

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

The purpose of the system is to review the WYO companies, flood vendors, and the NFIP DSA process for underwriting NFIP flood insurance policies and processing claims against those related flood insurance policies. Individual policyholders do not have direct access to U-CORT.

Individuals may access their records in accordance with record access policies of their respective WYO company, flood vendor, or the NFIP DSA. Individuals may also submit a PA or FOIA request to gain access to their information within NFIP ITS and U-CORT. Requests for PA and FOIA information must be in writing. The name of the requester, the nature of the record sought, and the required verification of identify must be clearly indicated. Requests should be sent to: FOIA Officer, Records Management Division, Federal Emergency Management Agency, Department of Homeland Security, 500 C Street, SW, Washington, D.C. 20472. FEMA PA and FOIA analysts search NFIP ITS and U-CORT for responsive records and determine releasability based upon the PA and FOIA statutes.

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

Individuals can provide updated information to their respective insurance provider or WYO company. In turn, WYO companies, flood vendors, and the NFIP DSA update the FEMA NFIP ITS system¹² or provide updated information to FIMA as part of an underwriting and claims review corrective action process. Individuals can correct inaccurate or erroneous information by using the information access procedures as identified above in Section 7.1. U-

¹² Additional information regarding this process is detailed in the DHS/FEMA/PIA-011 National Flood Insurance Program Information Technology System, *available at*, http://www.dhs.gov/sites/default/files/publications/privacy/privacy_pia_fema_nfipits_10122012.pdf.



CORT users can also correct access information such as telephone number or email address by accessing the “Contact Us” function and updating their information.

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

Individuals are notified of the procedures for correcting their information through this PIA as well as through the SORNs listed in Section 1.2. WYO companies, flood vendors, and the NFIP DSA are responsible for directing NFIP policyholders to contact their respective insurance agents if they have identified corrections to their policy or claims information. The policyholder is notified by their insurance companies if FEMA identifies an error. Agents may communicate with their customers in any way that results in an endorsement to a policy. Endorsements are used to formally make changes to policies, as discussed in the policy agreement. However, this process is not within the scope of U-CORT because U-CORT simplifies existing underwriting and claims operation reviews process, and does not interact directly with policyholders.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals are not aware of the procedure for correcting erroneous policy information in connection with U-CORT especially because U-CORT does not collect information directly from individuals.

Mitigation: FEMA manages this risk by informing the public of procedures for correcting their policy information through this PIA and the SORNs listed in Section 1.2. Additionally, WYO companies typically provide their policyholders with information on their respective privacy policies and the procedures to correct erroneous data. U-CORT users are given notice within the tool that corrected information can be sent FEMA using the “Contact Us” function.

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?

U-CORT institutes technical security controls, rules of behavior policies, security awareness communications, and other security processes, such as periodic audits and log reviews. Only a relatively small group of authorized users have access to U-CORT, based upon specific, established responsibilities and permissions set within the system. Users include FIMA staff and representatives of WYO companies, flood vendors, and the NFIP DSA. WYO company, flood vendor, and NFIP DSA personnel are enabled to access their respective organization’s data only. Insurance Examiners and other RID personnel have limited access to data commensurate with their respective positions. U-CORT maintains audit records for the system that are sufficient in detail to facilitate the reconstruction of events if a compromise or malfunction occurs or is suspected. U-CORT users that engage in unauthorized access to U-



CORT are subject to disciplinary action that can result in account termination or suspension.

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

All users assigned to work with U-CORT data are provided specific training on how to use the system and the applicable rules and policies that includes DHS automated system security access and data protection policies. Likewise, FEMA employees and contractors are required to take initial and annual privacy training. All personnel assigned to work with U-CORT data are given specific guidance regarding applicable rules and policies, including all DHS automated system security access policies.

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

Access is based on user roles, as outlined in Section 8.1. Users requesting access complete an access request form found on the login screen of the site that is evaluated and approved by a RID Branch Chief or Managing Examiner. If access is granted, FIMA provides the user with a temporary ID and password. Access is restricted based on the individual's organization, position, and role; for example: FEMA/FIMA personnel designated as system administrators will have full access to the site's tools and data; WYO companies, flood vendors, and the NFIP DSA are limited to viewing only the data associated with their respective company's account. This tiered access structure ensures that only the appropriate access permissions are granted and that users are limited in their ability to move throughout the site so that they only access information that they need to know to perform their duties.

FIMA RID leadership performs monthly audits to the access list to ensure that granted access privileges are appropriate and current. Following these audits FIMA RID leadership and the U-CORT system administrator maintain a log documenting any observed discrepancies, corrective action to be taken, and mitigation efforts to preclude future unauthorized access. Any unauthorized or otherwise inappropriate access is reported to the appropriate FEMA authorities.



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?

Uses of U-CORT data do not require information sharing agreements or MOUs. However, in the event of changes to the program or the system that result in the need for new information sharing agreements, MOUs, uses of U-CORT information, or access to U-CORT, such changes will be collaborated and vetted through the RI Director, RID Deputy Director, FEMA Privacy Officer, and the Office of the Chief Counsel. The information sharing agreement, MOU, updated PIA, and/or SORN will be submitted to DHS Privacy Office for formal review and official approval.

Responsible Officials

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

Approval Signature

Original signed copy on file with the DHS Privacy Office.

Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security