



Privacy Impact Assessment  
for the

# Mapping Information Platform (MIP)

**DHS/FEMA/PIA-028**

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## Abstract

The Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Federal Insurance and Mitigation Administration (FIMA) owns and operates the Mapping Information Platform (MIP). MIP supports the National Flood Insurance Program (NFIP) and provides an online method for property owners and certifiers to reference and petition to update the maps that define floodplains throughout the United States and its territories. FEMA is conducting this Privacy Impact Assessment (PIA) because the MIP collects, uses, maintains, retrieves, and disseminates personally identifiable information (PII) of property owners seeking changes to FEMA flood maps or purchasing flood mapping services and products through MIP; certifiers (i.e., Registered Professional Engineers and Licensed Land Surveyors) acting on behalf of property owners; and state and local government officials with authority over a community's floodplain management activities. This PIA replaces the previously published DHS/FEMA/PIA-003.

## Overview

The National Flood Insurance Act of 1968, Pub. L.90-448, as amended by the Flood Disaster Protection Act of 1973, Pub. L. 93-234, established that the National Flood Insurance Program (NFIP) will provide flood insurance in communities that voluntarily adopt and enforce floodplain management ordinances that meet the minimum NFIP requirements. FEMA assists communities by producing flood maps that indicate which properties are located in Special Flood Hazard Areas (SFHA). FEMA flood maps, as required under the NFIP legislation, are subject to revision through an administrative process referred to as a "Letter of Map Change" (LOMC). LOMCs are documents issued by FEMA that revise or amend the flood hazard information shown on the Flood Insurance Rate Map (FIRM) or Digital Flood Insurance Rate Map (DFIRM). LOMCs include two types of map changes: Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR). A LOMA is a flood map change with a small impact on a flood map (such as a small building) that would not require a flood map revision. A LOMR is a change that covers a larger area and may require a flood map revision. For the sake of clarity, this PIA uses the term "LOMC" as the general term covering all types of map amendments and revisions.

Property owners, communities, and developers may submit LOMC requests to revise the floodplain to alleviate the requirement for flood insurance under the NFIP. A property outside an SFHA is not required to have flood insurance, and often lenders do not require property owners who are financing or refinancing properties located outside of SFHAs to buy flood insurance policies. For instance, a property owner with a higher elevation property than surrounding properties may feel that his or her property should not be in a SFHA and therefore should not be required by law to be covered by flood insurance. The property owner may submit a LOMC request documenting his or her property information and, based on FEMA's final



determination, may not be required by law to have flood insurance for the property. However, if the property is mortgaged, the lenders may still require flood insurance for the financed property. Also, a property owner can choose to have flood insurance even if the property is located outside the SFHA. Property owners who have property that is not located in a SFHA but who want or are required by their mortgage lender to have flood insurance for their property, may be offered a reduced flood insurance premium for the associated property.

### Mapping Information Platform

FEMA MIP is used by the FIMA to support the LOMC process and store data associated with mapping projects initiated under the NFIP. This PIA replaces the previous MIP PIA.<sup>1</sup> The MIP is a workflow-based system and web portal that contains a variety of information (including both PII and non-PII) and tools used for the management, production, extraction, and sharing of flood hazard data.

FEMA processes LOMCs through both electronic- and paper-based processes. The online process uses two IT systems within MIP to electronically process LOMCs: (a) electronic Letter of Map Amendment (eLOMA); and (2) online LOMC. Only a “certifier” can initiate the eLOMA process. A certifier may be a Registered Professional Engineer, Licensed Land Surveyor, or Certified Professional through the National Flood Determination Association (NFDA) who is acting on behalf of a property owner. An individual property owner or other representative of the property owner can initiate the online LOMC process. The paper-based process allows individuals to submit hard copy LOMC applications to FEMA. Either a property owner or someone else working on his or her behalf can initiate the paper-based process.

The online LOMC is integrated with Treasury’s online payment system, Pay.gov, to allow users to pay fees and make electronic payments. FEMA’s *Fee Schedule for Processing Requests for Map Changes, for Flood Insurance Study Backup Data, and for National Flood Insurance Program Map and Insurance Products*, 74 FR 66138 (Dec. 14, 2009)<sup>2</sup> governs all fees collected within MIP. These fees are associated with specific types of requests and orders for specific products. FEMA’s MIP online LOMC application does not store the financial transaction information; rather, the request is directed through an end-to-end encrypted channel to Pay.gov that conducts all financial transactions for the MIP’s online LOMC application. Only the last four digits of the account number are stored in the MIP’s online LOMC application for credit card and electronic check (eCheck) transactions. The last four digits of the account number are maintained by FEMA as historical confirmation information for the transaction and

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<sup>1</sup> DHS/FEMA/PIA-003 Mapping Information Platform (MIP), January 20, 2006, available at <http://www.dhs.gov/privacy-documents-fema>. This new PIA includes a more detailed overview of the MIP process and includes MIP’s additional collection and use of financial information, sharing of information with the Department of Treasury (Treasury), and development of the online LOMC application within MIP.

<sup>2</sup> The schedule of flood map-related fees is accessible at <http://www.fema.gov/forms-documents-and-software/flood-map-related-fees#1>.



for auditing purposes. Pay.gov returns to the MIP online LOMC application the payment approval or denial information and the transaction ID over an encrypted web connection. FEMA sends a confirmation email to the user's email address with the result of the transaction

### Typical Letter of Map Change (LOMC) Transactions in MIP

The paper-based process for producing a LOMC is accomplished via the MIP's amendments and revisions workflow application. Paper application forms (e.g., the MT-1, MT-2, or MT-EZ), which include PII such as name, address, and contact information, are voluntarily completed by homeowners and/or registered professional engineers or land surveyors and submitted directly to FEMA for entry into the MIP. FEMA uses this information only if it becomes necessary to contact the homeowners, registered professional engineers, or land surveyors to obtain clarification on engineering and other data, or to mail correspondence. The homeowner or certifier may also provide additional information that does not contain PII, such as engineering data (e.g., topographic and flood elevations) and tax assessors' map, letters from the community, among other items.

All paper-based LOMCs are entered into the MIP by FEMA employees or contractors, such as Mapping Delegation Partners (MDP) (see Appendix B for a listing of FEMA's MDPs).<sup>3</sup> FEMA then reviews the engineering data and other information to determine whether an amendment or revision to a flood map is warranted. If warranted, FEMA issues a LOMC. MIP generates the LOMC determination and mails it to the LOMC requester. If a LOMC is not warranted, the MIP generates a letter stating no LOMC is warranted and mails the letter to the LOMC requester. FEMA performs random audits of these records to verify the results and to ensure adherence to applicable FEMA and other federal standards and requirements.

### Typical Letter of Map Change (LOMC) Transactions in MIP Online LOMC

For the MIP online LOMC application, the individual is required to register online. The registration process collects the individual user's name, email address, and a username. Once the user submits his or her registration information, an Activation Code is sent to the email address provided. The user can then sign in to the online LOMC application using the Activation Code. The user then enters the same information as mentioned above for the paper process and uploads

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<sup>3</sup> FEMA allows qualifying state and local governments to act on FEMA's behalf to perform the engineering review on data submitted by certifiers and property owners in support of LOMCs. These entities are known as Mapping Delegation Partners. Each year MDPs sign agreements with FEMA to allow them to continue to serve in this capacity on behalf of FEMA (see Appendix B for a listing of FEMA's MDPs). MDPs are provided the same access to the MIP granted to FEMA employees and contractors to conduct the engineering review of the LOMC request. This information includes the paper LOMC application forms (i.e., FEMA MT-1, MT-2, and/or MT-EZ) and engineering and other supporting data (e.g., topographic information, tax assessors' map.). The MDPs only complete LOMC requests for areas located within their governmental jurisdictions. FEMA grants access to MIP via a secure web interface requiring user authentication. MDPs also have access to scanned images of paper data submitted in support of the request.



all required artifacts (e.g., Property Deeds, maps) online. This online LOMC application is only accessible through HTTPS encrypted connection.

### Typical Letter of Map Change (LOMC) Transactions in MIP eLOMA

The certifier initiates the electronic application process through MIP's eLOMA. The certifier provides his or her PII either through a paper process or the eLOMA helpdesk. To register, all certifiers must provide a licensed engineer certification number or a licensed surveyor certification number, which establishes their credentials to update flood maps. FEMA then creates an account for the certifier and provides the certifier with login information. Once registered, the certifier may enter engineering data and other information, such as information from FEMA's MT-EZ or MT-1, which may be necessary to support a LOMC request.<sup>4</sup> FEMA or an MDP reviews the engineering data and other information (e.g., a copy of the recorded deed or plat for the property or structure) as entered and makes the determination as to whether a LOMC should be issued. If a LOMC is warranted, the final LOMC determination is generated by the MIP. If a LOMC is not warranted, a letter is generated from the MIP stating no LOMC is warranted.

The certifier is responsible for distributing the LOMC determination or letter. If a LOMC is not warranted, then there is no change to his or her specific area within FEMA's flood maps. However, if a LOMC is warranted, then a FEMA flood map may need to be updated changing a SFHA. If the property is now located within a SFHA, then the property owner is required by federal statute to have flood insurance coverage for the property. If the property is located outside of a SFHA, then the property owner is not required by federal statute to have flood insurance coverage for the property. If a property is not within a SFHA, the mortgage lender may still require the property owner to have flood insurance as a terms and condition of a mortgage for the property. FEMA performs random audits of these records to verify the results and to ensure adherence to applicable FEMA and other federal standards and requirements.

### Typical Transactions for Payments Associated with MIP

If a fee is required for the type of LOMC requested by a property owner, the user will be required to pay the fee by credit card or eCheck. When using the online LOMC application, the user will be prompted to enter either credit card or eCheck information. Once the user clicks the "submit" option, this information is sent to Pay.gov by way of a secure HTTPS encrypted session. Pay.gov forwards the information to the appropriate financial institution or credit card provider. When Pay.gov finishes processing the payment, it sends a status of either a successful or unsuccessful payment attempt back to the online LOMC application. The HTTPS session is closed and the transaction is complete. For paper-based transactions, property owners provide

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<sup>4</sup> The term "Letter of Map Amendment" is a specific type of map change, though it is sometimes used as a generic term encompassing all types of MT-1 map changes. For the sake of clarity, this PIA uses the term "Letter of Map Change" as the general term covering all types of map amendments and revisions.



payment information such as project identifier, type of mapping service, type of fee, payment type, and credit card account information using the *FEMA Payment Information Form* (FEMA Form (FF) 81-107). FEMA submits the financial information provided by the individual to Pay.gov. Once Treasury has processed the transaction, successful or unsuccessful payment confirmation information is sent to FEMA for the transaction. FEMA then sends a confirmation email to the user with the result of the transaction.

If the payment was successful, the online LOMC application will initiate the LOMC process requested by the user. FEMA will conduct the appropriate analysis to determine if the property is in an SFHA. If the LOMC request is granted, the property owner may be eligible for lower flood insurance premiums, or the option to not purchase flood insurance. If the payment was unsuccessful, the user has the option of resubmitting his or her financial information to complete the order. Confirmation of payment and the last 4 numbers of the credit card or bank account number is maintained with the LOMC application file for retention period specified above.

### *Information Sharing and Privacy Risks Associated with MIP*

FEMA routinely shares mapping information within MIP that pertains to requested LOMCs with MDPs. MDPs are qualifying state and local government entities that are under agreement with FEMA to perform the engineering review on submitted LOMC data on behalf of FEMA. A MDP can only access, within MIP, LOMC requests and the associated mapping information for properties within his or her jurisdiction. FEMA performs audits on the work performed by these partners to ensure adherence to FEMA standards.

## **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 National Flood Insurance Act of 1968, Pub. L. 90-448, as amended by the Flood Disaster Protection Act of 1973, Pub. L. 93-234, established that the NFIP will provide flood insurance in communities that voluntarily adopt and enforce floodplain management ordinances that meet minimum NFIP requirements. FEMA has promulgated regulations with respect to flood mapping found in 44 C.F.R. §§ 64.3 and 65.10. As part of the NFIP, FEMA assists communities by producing flood maps that indicate, among other things, which properties are located in SFHAs. The MIP maintains and administers the maps that define the statutory zones discussed above.

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



The DHS/FEMA/NFIP/LOMA-001 National Flood Insurance Program Letter of Map Amendment SORN, 71 FR 7990 (Feb. 15, 2006) covers information provided by members of the public in connection with LOMCs. That SORN is currently being revised to reflect changes to NFIP's Flood Insurance Rate Maps and to reflect FEMA's collection of credit card information and its sharing payment information with Treasury.

The DHS/ALL-004 General Information Technology Access Account Records System (GITAARS) SORN, 77 FR 70792 (Nov. 27, 2012) applies to user account creation and access.

The Treasury-009 Financial Management SORN, 75 FR 54423 (Sept. 7, 2010) applies to payment information shared and collected from Pay.gov.

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

A System Security Plan (SSP) has been completed for the MIP and an ATO was granted on March 2, 2012 by the FEMA Chief Information Officer.

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

Yes, the records retention policy in effect for MIP is records schedule N1-311-86-1 2A2c. FEMA is currently working with the FEMA Records Officer and NARA for a more appropriate records retention schedule for financial information.

### **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.**

The information in MIP is covered by the Paperwork Reduction Act. The following OMB Information Collections are associated with MIP: 1660-0015; 1660-0016; and 1660-0037. The FEMA forms associated with these collections are listed in appendix A.

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

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

From "Certifiers" (e.g., Registered Professional Engineers and Licensed Land Surveyors) and MDPs (e.g., state or local government officials with authority over a community's floodplain management activities), FEMA collects:

- Full Name;



- Position or Title;
- Company or Community Name;
- Six-Digit NFIP Community Number;
- Mailing Address;
- Telephone Number;
- Fax Number;
- Professional License Number;
- Professional License Expiration Date;
- Signature;
- Signature Date;
- Fill Placement and Date;
- Type of Construction;
- Elevation Data; and
- Base Flood Elevation (BFE) Data.

From individuals (e.g., homeowners, investors, and property developers), FEMA collects:

- Full Name;
- Mailing Address;
- Email Address;
- Telephone Number;
- Fax Number;
- Property Address;
- Fill Placement and Date;
- Type of Construction;
- Legal Property Description;
- Signature;
- Date of Signature;
- Credit Card Information (entered into Online LOMC and then transmitted to Pay.gov):
  - Credit Card Type;
  - Credit Card Number;
  - Expiration Date;
  - Billing Address;
- Electronic Check Information (entered into Online LOMC and then transmitted to Pay.gov):
  - Bank Account Type;
  - Bank Routing Number; and



- Bank Account Number.

From the Department of Treasury (Pay.gov), FEMA collects:

- Payment Confirmation Number.

For user account creation and access, FEMA collects:

- Full Name;
- Email Address;
- Username;
- Activation Code; and
- Password.

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

The sources of the PII in MIP are: 1) Certifiers (e.g., Registered Professional Engineers and Licensed Land Surveyors); 2) MDPs (e.g., state or local government officials with authority over a community's floodplain management activities); and 3) individuals (e.g., homeowners, investors, and property developers) who voluntarily submit PII via FEMA's MT-EZ, MT-1, and MT-2 paper forms. The Certifiers enter the PII directly into the eLOMA application. The Certifiers and individual property owners enter the PII directly into the online LOMC application.

The sources of the PII for the paper-based process are: 1) Certifiers; 2) individuals; and 3) MDPs. This information is voluntarily submitted to FEMA via FEMA's MT-EZ, MT-1, MT-2, and FF 81-107 paper forms to request and support a LOMC request. FEMA employees and contractors enter the data directly into the MIP.

The source of payment confirmation information is from Treasury's Pay.gov system. Only a payment confirmation number and the last four digits of the account number used for payment are sent from Pay.gov to the online LOMC application. FEMA uses the Trusted Collection Services (TCS) Single Service<sup>5</sup> by opening a secure HTTPS session with Pay.gov. When Pay.gov finishes settlement processing, it sends the results of the collection back to the online LOMC application. The HTTPS session is closed and the transaction is complete.

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

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<sup>5</sup> Trusted Collection Services (TCS) Single Service allows the online LOMC application to send a single non-interactive collection to Pay.gov for immediate processing.



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

FEMA assumes the data is accurate when it is submitted either by the Certifier, individual property owner, MDP, or Treasury. The Certifier, individual property owner, or MDP, who provides the data to FEMA must sign the MT-1, MT-EZ, or MT-2 forms to attest to the accuracy of the information provided. The signature also acknowledges that false statements provided to FEMA may be punishable under Title 18 of the United States Code, Section 1001.

For the paper-based LOMC process, FEMA employees or contractors, including the MDPs, enter the data into the MIP and then perform an engineering review of the data. If errors are found with the data provided, FEMA employees or contractors will contact the Certifier, individual property owner, or MDP to determine the nature of the error. The Certifier, individual property owner, or MDP may correct inaccurate information by submitting corrected information to FEMA, along with an explanation as to the cause of the error. FEMA employees or contractors will also perform periodic audit reviews of MIP data to ensure the accuracy of the data. FEMA employees and contractors correct any data entry errors identified during the audit.

For the eLOMA and online LOMC process, FEMA employees and contractors will perform random audits of the data entered by the user to ensure its accuracy. The audit schedule is a 100% review for the first record entered by a new user, then a randomly conducted review after the first successful pass of a FEMA audit review. If FEMA finds errors with the data entered by a user, that user will continue to be subjected to a 100% record review until he or she can pass a FEMA audit without errors.

Also, FEMA audits at least 10% of all work performed by the MDP to ensure he or she is adhering to FEMA's policies and standards.

For credit card and electronic check submissions, information is provided directly by the individual and, again, is assumed correct. If information is incorrect then the payment will not process and the user must resubmit correct information to complete the order.

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

**Privacy Risk:** One privacy risk associated with MIP is that FEMA could collect more information than is necessary for processing a LOMC.

**Mitigation:** This privacy risk is mitigated by reviewing the data collection policies for LOMCs at least every other year to ensure that only data necessary to process a LOMC is obtained. These reviews result in updates to the MT-1, MT-EZ, and/or MT-2 forms.

**Privacy Risk:** Another privacy risk associated with MIP is that the information collected by FEMA contains errors or is otherwise inaccurate.



**Mitigation:** This privacy risk is mitigated by collecting information directly from the public, reviewing all data collected, and conducting an engineering review to ensure the accuracy of the data provided.

## Section 3.0 Uses of the Information

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

FEMA uses the following information to establish a licensed professional as a registered user of the eLOMA system, which enables the licensed professional to process a LOMA request in the eLOMA system: name; company name; mailing address; professional license number; professional license expiration date; signature; and date of signature.

FEMA uses the following information to establish an individual as a registered user of online LOMC application, which enables property owners to process a LOMC request: full name; email address; username; activation code; and password.

To identify the property relevant to the LOMC request, FEMA uses the following information: six-digit NFIP community number; property address; and legal property description. To determine whether or not a structure is in the floodplain, FEMA requires data describing the home to include how it was built (often foundation type information), if the ground was changed during or after construction (commonly referred to as the placement of fill), and the elevation of the structure. Much of this information can be provided by a registered surveyor or through the community in which the home is located. The legal property description is used by FEMA as a means by which to associate the LOMC to a specific property/structure(s).

To contact the individual or Certifier that is requesting a LOMC to obtain clarification about the request or to send him or her correspondence, FEMA uses the following information: name; position or title; company or community name; mailing address; telephone number; e-mail address; and fax number.

Credit card or bank account information is transmitted to Pay.gov for payment processing of online orders. Those transactions are governed by an Agency Participation Agreement (APA) between FEMA and the Treasury Financial Management Service (FMS), which operates the Pay.gov transaction engine.

### 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, MIP does not use technology to conduct electronic searches, queries, or analyses to discover or locate a predictive pattern or an anomaly.



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

No component outside of FEMA has assigned roles and responsibilities within MIP.

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

**Privacy Risk:** There is a privacy risk associated with MIP that information could be used for purposes other than those specified in 3.1.

**Mitigation:** This privacy risk is mitigated by requiring access controls that limit access to MIP information to FEMA staff with a valid “need-to-know.” Also, the annual awareness training for all administrative users includes a discussion about PII and the responsibilities that each administrative user bears in protecting and using that data. End users are cautioned about appropriate use through a log in banner. Additionally, MIP only collects information necessary to process a map change or amendment and to provide copies of such changes.

## **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 in several ways prior to collecting their information. At the point of collection, individuals are provided a statement that the financial payment information will be sent to and processed by Pay.gov. Also, a Privacy Act Statement is posted on a web page during the MIP registration process and is available from within the application at any time. The Privacy Act Statement is also included on the paper forms identified in Appendix A. In addition, FEMA provides notice through its privacy compliance documentation for the application, specifically this PIA and the SORN(s) listed in Section 1.2.

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

The LOMC process is voluntary. The information collected is only used in the eLOMA, online LOMC application, or the paper-based LOMC process to fulfill the purposes in Section 3. If the individual chooses not to provide information, he or she cannot request a LOMC.

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

**Privacy Risk:** There is a privacy risk associated with MIP that individuals will be unaware of the information collected and how the information is used and shared, specifically, credit card and electronic check information.



**Mitigation:** This privacy risk is mitigated by providing notice to the public via this PIA, and the SORN(s) listed in Section 1.2.

## Section 5.0 Data Retention by the project

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

FEMA stores LOMC data in an active mode (retained online and accessible through the web interface) for two years after which the information is retired to the Federal Records Center (FRC). The information is destroyed 20 years after FEMA's final determination or map revision date, in accordance with NARA authority N1-311-86-1, item 2A2c. This information is maintained to facilitate legal records of the classification of the flooding characteristics of specific parcels of land as they are and were previously categorized under the NFIP. Changes to those classifications affect the costs of insuring land under the NFIP, which requires that the program have the ability to determine a floodplain classification at any point in the last 20 years to address potential disputes and provide data for forward-looking insurance decisions.

All financial payment information is passed to Pay.gov. Masked financial information is retained on the screen only as long as required to facilitate the ordering of the map product. Only the last four digits of the credit card or bank account number are stored within MIP. Confirmation information from Treasury and the last four digits of the credit card or bank account information are kept for auditing purposes only. The last four digits of the credit card or bank account information and payment confirmation number are kept for no longer than 2 years.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a privacy risk associated with MIP that FEMA will hold data for longer than the approved record retention period.

**Mitigation:** This privacy risk is mitigated by keeping paper records in secure storage and protecting all electronic records as described in the System Security Plan. Paper records are then scanned and copies of the scanned records are provided to the FRC on CD or DVD. The paper records are then destroyed by shredding them in accordance with FEMA's records retention schedule. Digital records (excluding scanned copies of paper LOMC records) stored on magnetic tape are destroyed by degaussing in accordance with FEMA's records retention schedule. MIP only retains credit card or electronic check information strictly for the time needed to facilitate the ordering of maps. MIP only retains payment confirmation information and the last four digits of the credit card or bank account number for transaction confirmation and auditing purposes. MIP staff are provided training on FEMA's records retention policies and processes. Refresher training is provided periodically or as deemed necessary by section head.



## 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 shares information with MDPs (state and local governments) pursuant to signed agreements that allow them to make LOMC determinations on behalf of FEMA. MDPs are provided the same access to the MIP granted to FEMA employees and contractors to conduct the engineering review of the information submitted in support of a LOMC request. The MDPs only complete LOMC requests for areas located within their governmental jurisdictions. Access to the MIP is granted via a secure web interface requiring user authentication.

Electronic payment information (credit card or eCheck information) is sent to the Treasury's Pay.gov system. The individual or Certifier submitting the payment information never leaves the agency application or website. Instead, the application will open an HTTPS session with Pay.gov and send only the relevant financial data. Pay.gov then sends the results of the payment process back to the online LOMC application. The HTTPS session is closed and the transaction is complete. Payment information is in no way otherwise shared with external organizations beyond what is described here.

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

Routine use C of the DHS/FEMA/NFIP/LOMA-001-National Flood Insurance Program Letter of Map Amendment SORN allows FEMA to share information with its MDPs and other contractors that are under agreement with FEMA to perform the engineering review on submitted LOMC data on behalf of FEMA for properties within their respective jurisdictions. That SORN is currently being revised to reflect changes to NFIP's Flood Insurance Rate Maps and to reflect FEMA's collection of credit card information and its sharing payment information with Treasury.

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

Information can only be shared outside of FEMA pursuant to the Privacy Act, 5 U.S.C. § 552a(b), including the routine uses identified in the SORNs listed in Section 1.2. No other re-dissemination of information is authorized. Information provided to Treasury through Pay.gov can only be used pursuant to the Treasury 009-Financial Management System SORN as mentioned in Section 1.2.



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

Disclosures of electronic records containing PII are stored in the log server for MIP. The log includes the name of the individual requesting the records, the purpose for the request, and the records provided.

Disclosures of paper records that contain PII occur from and are tracked by the FEMA Engineering Library, which is located at 847 South Pickett St., Alexandria, VA 22034. Such requests are referred to FEMA's Office of Chief Counsel and FEMA Disclosure Office for guidance. All requests for such information are logged into a tracking spreadsheet that contains the name of the individual requesting the record, the date of the request, and the information being requested. This log is maintained at the FEMA Engineering Library. In addition, the FEMA Disclosure Office tracks Privacy Act and FOIA request for the agency.

## 6.5 Privacy Impact Analysis: Related to Information Sharing

**Privacy Risk**: There is a privacy risk associated with MIP that information shared could be used for a purpose beyond that for which it is collected.

**Mitigation**: This privacy risk is mitigated by only sharing information as needed to update mapping information and processing payment of fees associated with mapping products and services. Additionally, FEMA only collects information that is needed to comply with federal statutes and regulations.

## Section 7.0 Redress

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

Registered users of eLOMA and Online LOMC may access their information by logging into MIP. Also, individuals may follow procedures outlined in the Agency's SORNs mentioned in Section 1.2. Requests for Privacy Act information must be in writing, and clearly marked as a "Privacy Act Request." The name of the requester, the nature of the record sought, and the required verification of identity must be clearly indicated. Requests should be sent to: FOIA Officer, Office of Records Management, Federal Emergency Management Agency, Department of Homeland Security, 500 C Street, SW, Washington DC 20472.

Additionally, individual's information collected by Pay.gov is accessible in accordance with the Treasury 009-Financial Management System SORN.



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

Changes to information of any kind are accomplished through editing one's own account (eLOMA users only) or by mailing a written statement to FEMA identifying the information the individual feels is in error. If the error involves information that requires certification (i.e., elevation data), the original certifier must provide a statement that explains the cause of the original error and the steps taken to remediate the error. Individuals may choose to send FEMA other information they deem necessary to substantiate their statement. FEMA evaluates all requests against the original record. If FEMA determines that there is an error, it will create a new LOMC request to correct the error and supersede its previous determination. If no error exists, FEMA will contact the individual to explain why FEMA feels no error exists. No additional action will be taken.

Also, FEMA's Privacy Act and Freedom of Information Act processes allow another route to correcting errors or accessing information held in MIP. Individuals may follow procedures outlined in the Agency's SORNs mentioned in Section 1.2. Requests for Privacy Act information must be in writing, and clearly marked as a "Privacy Act Request." The name of the requester, the nature of the record sought, and the required verification of identity must be clearly indicated. Requests should be sent to: FOIA Officer, Office of Records Management, Federal Emergency Management Agency, Department of Homeland Security, 500 C Street, SW, Washington DC 20472.

Additionally, individual's information collected by Pay.gov is accessible in accordance with the Treasury 009-Financial Management System SORN.

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

FEMA notifies MIP users about change procedures in the MIP user guide/handbook. All user guides and other documentation for MIP are located online and accessible from the application's home page. Secondly, additional help is available to users by calling the dedicated helpdesk. Lastly, FEMA provides notice of procedures for correcting their information by way of this PIA and the SORNs outlined in Section 1.2.

## **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk associated with MIP that an individual or certifier is unaware of the process by which his or her PII may be corrected.

**Mitigation:** This privacy risk is mitigated though notice provided on the instructions of the MT-1, MT-EZ, and MT-2 forms. The instructions also inform individuals and Certifiers to



contact FEMA's Mapping Information eXchange, a toll-free customer service center, to help answer any questions about FEMA policy and procedures, and the NFIP in general. FEMA also has established a webpage for the NFIP that helps address individuals and Certifiers concerns and questions related to LOMCs and other NFIP-related topics.<sup>6</sup>

## 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?**

Only FEMA and its contractors, including the MDPs, have access to information collected in support of a LOMC requests. For electronic records contained within MIP, user roles define what data within MIP a user can access. Audits of account modifications and security operations are monitored constantly. Modifying a record creates a security event that is logged. Logs are reviewed on a monthly basis. Additionally, there is an Intrusion Detection System/Intrusion Prevention System (IDS/IPS) in place that warns when security operations fail repeatedly. FEMA protects information contained in the application by assigning user roles, thus a user who is not authorized to see protected data will not see that data in the interface. Circumventing or attempting to circumvent the role-based user account privileges will cause the IDS/IPS to flag the activity as an intrusion and appropriate actions will be taken by administrative staff to terminate such illicit access.

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

FEMA provides initial and annual refresher privacy and security training. FEMA requires employee and contractor staff to receive privacy and security training as conditions of obtaining public trust access to FEMA information and facilities. Additionally, FEMA employees and contractors are required to complete annual security awareness training, which includes training on privacy and protection of PII before accessing FEMA's network and information systems. FEMA staff provides privacy and security training to MDPs at least once annually. Refresher training may also be required or provided to FEMA, contractor, and MDP staff if deemed necessary by FEMA management.

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

User access is managed by Lightweight Directory Access Protocol (LDAP) accounts for each user. Each account has specific privileges based on roles with access controlled on a need-

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<sup>6</sup> The webpage can be accessed at <http://www.fema.gov/plan/prevent/fhm/index.shtm>.



to-know basis so that only data relevant to the specific user and role is accessible. The roles are completely defined in the SSP also on file with FEMA. All access delegations are authorized by FEMA management.

#### **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?**

All proposed Mapping Activity Statements, Memoranda of Understanding, and Information Sharing Agreements are reviewed by the FEMA Privacy Officer and Office of Chief Counsel, in addition to the MIP project security staff and FEMA Security Office, prior to granting user access to the MIP for MDPs.

### **Responsible Officials**

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

### **Approval Signature**

Original signed and on file with the DHS Privacy Office.

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



## APPENDIX A: FEMA FORMS

OMB ICR # 1660-0015: FEMA Form MT-1 “*Application Forms for Conditional Letters of Map Amendment (CLOMAs), Final Letters of Map Amendment (LOMAs), Letters of Map Revision Based on Fill (LOMR-Fs), and Conditional Letters of Map Revision Based on Fill (CLOMR-Fs),*” includes:

- FEMA Form 086-0-26, Property Information Form;
- FEMA Form 086-0-26A, Elevation Form; and
- FEMA Form 086-0-26B, Community Acknowledgement of Fill.

OMB #1660-0016: FEMA Form MT-2 “*Application Forms for Conditional Letters of Map Revision (CLOMR) and Letters of Map Revision (LOMRs),*” includes:

- FEMA Form 086-0-27, Overview & Concurrence Form;
- FEMA Form 086-0-27A, Riverine Hydrology & Hydraulics Form;
- FEMA Form 086-0-27B, Riverine Structures Form;
- FEMA Form 086-0-27C, Coastal Analysis Form;
- FEMA Form 086-0-27D, Coastal Structures Form; and
- FEMA Form 086-0-27E, Alluvial Fan Flooding Form.

OMB ICR #1660-0037: FEMA Form MT-EZ (086-0-22) “*Application Form for Single Residential Lot or Structure Amendments to National Flood Insurance Program (NFIP) Maps*”



## APPENDIX B: FEMA Mapping Delegation Partners

Below is a listing of FEMA's Mapping Delegation Partners:

- State of Alabama;
- Denver Urban Drainage; Denver, CO;
- Harris County, TX;
- State of Illinois;
- Mecklenburg County, NC; and
- State of North Carolina.