



Privacy Impact Assessment
for the

Quality Assurance Recording System

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Abstract

The Department of Homeland Security (DHS) Federal Emergency Management Agency's (FEMA), Response and Recovery Bureau operates the Quality Assurance Recording System (QARS). The proposed system of telephone call and computer screen capture recording is for internal employee and contractor performance evaluation, training and quality assurance purposes to improve customer service to disaster assistance applicants requesting assistance under the Robert T Stafford Disaster Relief and Emergency Assistance Act. FEMA is conducting this Privacy Impact Assessment (PIA) because QARS call recordings and screen captures information about the FEMA employees and/or contractors as they provide customer service to disaster assistance applicants. The system will maintain information about disaster assistance applicants, but the focus of this system is on employee and contractor quality assurance.

Overview

FEMA's Response and Recovery Bureau operates the Quality Assurance Recording System (QARS). The proposed system is for internal employee performance evaluations, training and quality assurance purposes to improve customer service to disaster assistance applicants. The purpose of QARS is consistent with FEMA's mission to improve its capability to respond to all hazards and support the citizens of our Nation. In addition, QARS will assist FEMA in accomplishing a critical objective presented in FEMA's 2008 – 2013 Strategic Plan.¹ QARS will enable both FEMA's Quality Control Department and National Processing Service Center (NPSC) Supervisory staff to better monitor, evaluate, and assess its employees and/or contractors at the NPSCs, so that FEMA can improve customer service to those seeking disaster assistance.

Currently, FEMA conducts only real-time call monitoring of disaster assistance calls at its NPSCs for quality assurance and provides notice to disaster assistance applicants of such monitoring. The current procedure requires the reviewer to access four separate systems simultaneously to accomplish the quality monitoring process of one call: 1) the Call Management System (CMS) to identify the agent and his/her availability to be monitored on a live call; 2) the Systems Management Server (SMS) to capture the agent's desktop screen as they perform work in the National Emergency Management Information System (NEMIS);² 3) Avaya Softphone to log into the desktop phone of the agent being monitored; and 4) the Quality Control Application to conduct the evaluation process and complete the form and house the quality score of the agent being monitored. The current call monitoring procedure places laborious requirements upon the Quality Control reviewer, resulting in a less efficient, more time consuming evaluation process that may make it more difficult for the Quality Control department to achieve its goal

¹ *FEMA Strategic Plan Fiscal Years 2008 – 2013: The Nation's Preeminent Emergency Management and Preparedness Agency*, includes a Customer Care objective to: "Instill a culture that is focused both internally and externally on customer care" (p.33).

² NEMIS is an integrated system that provides FEMA, the states, Native American tribes, and certain other federal agencies with automation to perform disaster response and recovery operations. NEMIS supports all phases of emergency management, from mitigation planning to situation assessments, providing disaster assistance, command and control, programmatic planning, emergency support, and mitigation operations. A PIA for NEMIS is under development



to evaluate a minimum of five calls and/or case reviews, per employee/contractor during a two-week pay period.

QARS will allow FEMA to increase the cost-effectiveness of its quality evaluation processes. FEMA can review more calls, encompassing various call types across all hours of operation while reducing the subjectivity associated with real-time, live call monitoring. With the ability of QARS to record and playback calls at the discretion of the Supervisor and/or Quality Control reviewer, the employee/contractor can listen and learn accordingly during the evaluation process. The efficiency and flexibility of QARS makes it a superior tool for conducting employee/contractor evaluations and quality assurance.

QARS involves three transaction types: 1) the recording of a voice transaction between the FEMA employee/contractor with disaster assistance applicants, inclusive of the desktop screen transaction; 2) the recording of the FEMA employee/contractor's desktop computer screen, during non call-related case review; and 3) the FEMA Supervisor and/or Quality Control Specialist evaluation on the recordings of employee/contractor calls and case review screen transactions, and generate a quality score in QARS.

Voice and Desktop Screen Recording During a Telephone Call

Voice recordings begin once the caller contacts FEMA's 1-800 line to speak with a FEMA employee/contractor regarding disaster assistance. QARS is typically set to record 100% of all incoming calls to FEMA's disaster assistance help line, but FEMA may reduce this percentage, during times of extremely high call volumes. The call recording process starts automatically once the caller and FEMA employee/contractor are connected on the line. A random percent (up to 10%) of the FEMA employee/contractor desktop computer screens will also be recorded to accompany the voice transaction. If a call is selected to include desktop screen recordings, the screen recording begins simultaneously with the voice recording. Recording the desktop screens during voice transactions will allow the Quality Control Specialist and/or Supervisor to observe the FEMA employee/contractor's data entry and case review accuracy, which determines the eligibility of an individual for disaster aid. QARS maintains the call recording until an evaluation is performed by a Quality control Specialist and/or Supervisor.

Voice and screen recordings are evaluated in QARS and archived pursuant to the General Records Schedule "FEMA Series Disaster Assistance Program-15-1," for six years to allow time to resolve any personnel matters that may arise from the use of QARS data for employee/contractor performance evaluations or to determine qualifications for continued employment. FEMA will purge recordings that are not used in an evaluation of a FEMA Customer Service Representative or contractor within 45 days, per the FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-2."

Desktop Screen Recording Not Related to a Telephone Call

In addition to taking telephone calls, FEMA employee/contractor review disaster assistance applications to determine eligibility by reviewing the applicant's case file maintained in NEMIS. During this case review, a random percentage of desktop computer screens are recorded into QARS based on the FEMA employee's/contractor's identification or particular work assignment. Once the screen is recorded, it is maintained in QARS until an evaluation is performed by a Quality control Specialist and/or Supervisor or for forty-five days, whichever comes first.



Screen recordings are evaluated in QARS, archived and held pursuant to the FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-1," for six years to allow time to resolve any personnel matters that may arise from the use of QARS data for employee/contractor performance evaluations or to determine qualifications for continued employment. FEMA will purge recordings that are not used in an evaluation of a FEMA Customer Service Representative or contractor within 45 days, per the FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-2."

Quality Evaluation

Finally, QARS maintains the results of the management evaluation of the individual employee recording. FEMA will set targets for the percentage of NPSC transactions to be evaluated in QARS based on factors including but not limited to: call volumes, special project initiatives (e.g. a recertification project), and training objectives. Recordings in QARS may be selected randomly or targeted for evaluation of the quality of service delivered to the disaster assistance applicant. The Quality Control Department's goal is to evaluate a minimum of five calls and/or case reviews, during an employee/contractor's two-week pay period. The evaluator will use the appropriate quality form to assess the employee/contractor's quality of work, and a score ranging from 0 to 100 is tabulated and generated by QARS. The quality score is stored in QARS and retrieved using the employee and/or contractor's name, and/or user identification number for subsequent review and evaluation. The evaluation is electronically communicated to the employee/contractor for review and possible discussion. All evaluations are maintained within the Quality Control department and become a part of the employee/contractor's permanent personnel record.

The evaluations stemming from the recordings in QARS are used to determine training/coaching opportunities for FEMA employees and/or contractors, which will impact continued employment qualifications and/or promotion within FEMA. Contract staff calls are subject to evaluation by FEMA Supervisory and/or Quality Control staff according to the guidelines and provisions written in the contract between FEMA and the contracting entity.

QARS may include the personally identifiable information (PII) of disaster assistance applicants from the Federal Emergency Management Agency-008 Disaster Recovery Assistance (DRA) Files system of records [September 24, 2009, 74 FR 48763], which FEMA employees and/or contractors access via NEMIS when interacting with disaster assistance applicants or during case review. Although the recordings may include the disaster assistance applicant's PII, recordings are only retrievable using FEMA employee/contractor information. FEMA will access the information in QARS using the employee/contractor's name and/or their user identification number. The system will not retrieve information by the individual disaster applicant. Evaluated records will be maintained for six years, unevaluated calls will be retained for no more than 45 days.

The collection of the employee/contractor quality assurance information is covered by the DHS/All -020 Department of Homeland Security Internal Affairs system of records [November 18, 2008, 73 FR 67529]. In order to provide more transparency to the program, DHS/FEMA is publishing a new system of records.

FEMA collects the information pursuant to the following legal authorities:



- Federal Sector Labor Management Relations Act, Pub. L. 95-454 as amended, codified in 5 U.S.C. § 4302, and 5 U.S.C. § 7106(a);
- Pub. L. 109-295, title VI, § 696, Oct. 4, 2006, 120 Stat. 1460, as codified in 6 U.S.C. § 795, Fraud, Waste, and Abuse Controls;
- SC § 204(b), Appointment, selection, classification, and promotion of employees by Administrator;
- FEMA Directive 3700.1(I); and
- FEMA Directive 3700.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

QARS includes the voice recordings of telephone calls with disaster assistance applicants made or received by FEMA employees and/or contractors at FEMA's National Processing Service Centers (NPSCs), screen captures of employee/contractor customer service transactions in NEMIS for both call-related transactions and case review customer service transactions not related to a telephone call, and a "quality score" generated by the QARS evaluation form, which is completed by the Quality Control Specialist and/or Supervisor for each call or case review transaction evaluated.

QARS may include PII of disaster assistance applicants, which FEMA employees and/or contractors access via NEMIS when interacting with disaster assistance applicants by telephone or during case review. This information could include the following: an individual's name, home address, Social Security number, home phone number, current mailing address and phone numbers, personal financial information including the disaster applicant's bank name, bank account information, insurance information, individual or household income, the number of occupants, and the dollar amount of their losses.

The "quality score" generated in QARS pertains to the FEMA employee or contractor who conducts the phone transaction or case review involving an individual disaster assistance applicant's file. The score does not contain any applicant PII and is not related to the applicant in any way, nor does it have any impact on the disaster assistance applicant who contacts FEMA for disaster assistance.

1.2 What are the sources of the information in the system?

There are three sources for the information maintained in QARS: 1) disaster assistance applicants requesting assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act. 2) FEMA employees/contractors providing customer service to disaster assistance applicants or conducting



case processing review of an applicant's file; and 3) the QARS generated quality score about the performance of the FEMA employee and/or contractor after the FEMA Quality Control Specialist and/or Supervisor completes the QARS evaluation form.

1.3 Why is the information being collected, used, disseminated, or maintained?

FEMA collects, uses, and maintains this for internal employee performance evaluation, training, and quality assurance purposes to improve customer service to disaster assistance applicants requesting assistance under the Robert T Stafford Disaster Relief and Emergency Assistance Act.

1.4 How is the information collected?

QARS collects the voice recordings via telephone during individual disaster assistance applicant calls to or from FEMA's NPSCs at random. QARS randomly selects the computer screen captures during telephone transactions between a FEMA employee and/or contractor and a disaster assistance applicant, made to or from a NPSC; or during case review transactions of a disaster assistance application unrelated to a telephone call. QARS tabulates a quality score about the performance of the FEMA employee and/or contractor when the FEMA Quality Control Specialist and/or Supervisor uses the QARS evaluation form to evaluate customer service transactions related to telephone calls and/or case review transactions not related to a call.

As noted above, QARS randomly records telephone conversations and computer screen captures, however, the selection of these recordings for evaluation may, or may not, be random. QARS allows FEMA's Quality Control Specialists and Supervisors to manually select recorded calls and/or screen captures for evaluation.

1.5 How will the information be checked for accuracy?

The information in QARS is not checked for accuracy. If anything, it is potentially a corrective measure in itself for the Disaster Recovery Assistance Files System of Records [September 24, 2009, 74 FR 48763]. The call recordings and screen captures in QARS provide a "snap shot" of individual customer service transactions and are neither collected nor stored in a format that is correctable or retrievable by applicant name. As such, QARS has little impact on a disaster assistance applicant's ability to obtain FEMA assistance. An exception would be if a supervisor notices an inconsistency of information about an applicant between a recording and screen shot. In that situation the supervisor would make sure that the applicant's file is corrected in the aforementioned system. The information in QARS concerning employees and contractors is stored separately from the Disaster Recovery Assistance Files system of records information accessed via NEMIS, which is used in determining eligibility for FEMA assistance. The Department of Homeland Security Federal Emergency Management Agency-008 Disaster Recovery Assistance Files system of records [September 24, 2009, 74 FR 48763] contains instructions on "Record Access Procedures" and "Contesting Record Procedures" should a disaster applicant have a question about the accuracy of the information in their disaster assistance case file.



1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

The legal basis for the collection of information is found in the following: 5 U.S.C. § 301; Federal Sector Labor Management Relations Act, Pub. L. 95-454 as amended, codified in 5 § Sec. 4302, and 5 U.S.C. § 7106(a); Pub. L. 109-295, title VI, Sec. 696, Oct. 4, 2006, 120 Stat. 1460, as codified in 6 U.S.C. § 795, Fraud, Waste, and Abuse Controls; 29 USC § 204(b), Appointment, selection, classification, and promotion of employees by Administrator; FEMA Directive 3700.1(I); and FEMA Directive 3700.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

QARS is capable of collecting and storing a significant amount of PII within its voice recordings and screen captures, depending on the targets set for the percentage of NPSC activity to be evaluated in QARS. The privacy risk and the measures taken to mitigate this risk are discussed below.

Privacy Risk: Because QARS may contain information from the DHS/FEMA-008 Disaster Recovery Assistance (DRA) Files system of records [September 24, 2009, 74 FR 48763], there is a possible risk that information from the DRA Files system of records could be inappropriately disclosed pursuant to QARS rather than DRA..

Mitigation: FEMA will mitigate this risk through training. System-specific privacy awareness training is required for all QARS users. Users will be trained to ensure that the information in QARS, whether from the DRA Files system of records or the QARS system of records, can only be shared or disclosed in a manner consistent with the purpose of the collection and consistent with the system of records notice covering the specific information that is to be shared or disclosed.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

FEMA uses the information QARS collects, maintains and stores, for internal quality assurance purposes to improve customer service to individuals requesting disaster assistance. In addition, FEMA uses the information to monitor and improve the quality of its responses to disaster assistance applicants by providing an efficient and effective means of assessing the performance of FEMA's employees and contractors. FEMA also uses these assessments to determine individual qualifications for employment retention and possible future promotion with DHS/FEMA. The voice recording information will also assist supervisors in coaching, mentoring, counseling and allow Customer Service Representatives to better assist disaster assistance applicants.



2.2 What types of tools are used to analyze data and what type of data may be produced?

QARS cannot be used for data-mining and does not utilize tools to produce data independent of a Quality Control Specialist and/or Supervisor's input. QARS call recording data cannot be used to make determinations about the public and does not impact the public obtaining disaster assistance.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

This system does not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

FEMA utilizes access controls, such as role-based access; privacy awareness training and QARS-specific training; and signed confidentiality agreements to ensure that the information in QARS is used in accordance with Section 2.1 above. In addition, information FEMA collects, stores, and maintains in QARS is subject to a set of automated business rules for ensuring that disaster assistance applicants are handled in a standard and equitable manner.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 What information is retained?

The information described in Section 1.1 is retained in QARS.

3.2 How long is information retained?

FEMA retains in QARS information for different lengths depending on the use of the data. Records within QARS that are used in an evaluation of a FEMA Customer Service Representative or contractor is retained, pursuant to FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-1," for six years to allow time to resolve any personnel matters that may arise from the use of QARS data for employee/contractor performance evaluations or to determine qualifications for continued employment. FEMA will purge recordings that are not used in an evaluation of a FEMA Customer Service Representative or contractor within 45 days, per the FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-2."



3.3 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

Yes. NARA approved the retention schedule on June 27, 2008.

3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Privacy Risk: There is a risk of FEMA maintaining QARS data longer than the approved record schedule.

Mitigation: To mitigate this risk, the QARS User Manager sets an automated schedule for the purging of non-evaluated data and for the archiving of evaluated data, per the approved record schedule. In addition, the QARS User Manager will perform a scheduled log audit, which will ensure all recordings have been managed according to the defined retention schedule.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

FEMA will share QARS data internally on a “need-to-know” basis for documented business purpose. For example, the DHS Office of the Inspector General (OIG) may request access to the data and it would be shared for the purpose of any OIG investigations for possible fraud. The information shared for such a purpose would any of the information noted in Section 1.1.

4.2 How is the information transmitted or disclosed?

Should FEMA receive a written request to share QARS data internally for a documented business purpose the information is transmitted in an encrypted, password-protected file via secure electronic transmission.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Privacy Risk: There is a risk of FEMA’s internal sharing of QARS information including too much information from the DHS/FEMA – 008 Disaster Recovery Assistance system or records.



Mitigation: To mitigate this risk, information in QARS is only shared internally on a limited basis and only upon written request with those who have an established need to know relevant to the performance of their official duties.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

FEMA only shares QARS information outside of DHS pursuant to the routine uses included initially in the DHS/All -020 Department of Homeland Security Internal Affairs system of records [November 18, 2008, 73 FR 67529], a new DHS/FEMA specific Quality Assurance Recording system of records notice, and only after DHS determines that the receiving component or agency has a need to know the information within the context of their respective duties. QARS may include information from the DHS/FEMA - 008 Disaster Recovery Assistance (DRA) Files system of records [September 24, 2009, 74 FR 48763]. As such, DRA information will only be shared pursuant to the DRA Files system of records.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

Yes. The DHS/All -020 Department of Homeland Security Internal Affairs system of records [November 18, 2008, 73 FR 67529] covers the limited instances where information in QARS, including personally identifiable information may be shared outside of DHS. In addition, DHS has determined that for additional transparency it will issue a new DHS/FEMA specific SORN for the Quality Assurance Recording System.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

The information in QARS may contain the PII of disaster assistance applicants and FEMA employees and/or contractors. FEMA will not share this information outside of DHS, except as allowed under the routine uses included in the DHS/ALL-020 Department of Homeland Security Internal Affairs SORN and the new DHS/FEMA specific Quality Assurance Recording SORN. After receiving a written request, FEMA will share QARS data for business purposes under the routine uses in the DHS/ALL-020 Department of Homeland Security Internal Affairs SORN and the new DHS/FEMA specific Quality



Assurance Recording System. FEMA will electronically transmit the information in an encrypted, password-protected file via secure electronic transmission.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Privacy Risk: There is a risk of unauthorized use or disclosure of the information in QARS, including disaster applicant information that may be part of the DHS/FEMA - 008 Disaster Recovery Assistance (DRA) Files system of records [September 24, 2009, 74 FR 48763].

Mitigation: To mitigate the risk of unauthorized use or disclosure to information in QARS, external sharing is limited to requests in writing, pursuant to a Routine Use in the upcoming QARS SORN, and only for a documented business purpose; along with the minimum necessary to achieve the purpose of the sharing under the upcoming QARS SORN Routine Uses. FEMA will only share information that is part of the DHS/FEMA - 008 Disaster Recovery Assistance (DRA) Files system of records [September 24, 2009, 74 FR 48763] externally pursuant to the Routine Uses in the DRA Files system of records notice.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

FEMA provides notice to individual disaster assistance applicants in several ways prior to QARS collecting voice recordings and screen captures. First, FEMA provides notice of the collection through the privacy compliance documentation for QARS, namely the system of records notice and this PIA. Second, when disaster assistance applicants call FEMA's NPSCs via the toll-free number, an automated message will announce to each caller in both English and Spanish: "*This call may be monitored and recorded for quality assurance purposes.*" Additionally, when FEMA employees and/or contractors make phone calls he/she will read a scripted privacy notice during the introduction of the call after verifying that the individual is the applicant, co-applicant, or official designated to discuss the matter of the call. The language of the privacy notice is consistent with the language heard on the automated message for callers contacting FEMA and include: "*This call may be monitored and recorded for quality assurance purposes.*" Calls where the applicant chooses the Spanish speaking option upfront prior to speaking to a live agent, will be routed to a Spanish notification, announcing that the call may be monitored and recorded. And lastly, www.DisasterAssistance.gov will include a Privacy Act Statement which will serve notice to disaster assistance applicants applying on-line that their information may be used for quality control purposes. The text of the Privacy Act Statement, call script, and automated message is included as an appendix to this PIA.



6.2 Do individuals have the opportunity and/or right to decline to provide information?

As is the case with the existing call monitoring, an automated message from FEMA at the beginning of each call will inform the disaster assistance applicant of the call recording and the applicant will consent to the call recording by continuing the call beyond the recorded message. The disaster assistance applicant may refuse the call recording by terminating the call at the point of being informed by the recorded message. The Interactive Voice Recorder (IVR) serves as the prompt for discontinuing the call prior to speaking with a live agent. The IVR advises all callers that calls may be monitored or recorded. As with the current process and government agency 800 line standards, the announcing of recording serves as the opportunity for the caller to disconnect, if they do not agree to be monitored and/or recorded.

Refusing to have a call recorded will not affect a disaster victim's ability to obtain disaster assistance, however, disaster assistance applicants who refuse the call recording will forfeit the option of applying for disaster assistance or check the status of their disaster assistance applications by phone. As is the case with the existing call monitoring, disaster assistance applicants who do not consent to call recordings may apply for disaster assistance by completing the online disaster assistance application at www.DisasterAssistance.gov, however, information collected through www.DisasterAssistance.gov is part of the DRA Files system of records, which is accessible via NEMIS, and may therefore be randomly selected by QARS for recording during case review, and subsequently included in QARS.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

FEMA uses the information in QARS for internal employee performance evaluation, training and quality assurance purposes to improve customer service to disaster assistance applicants. There is no other use of the information in QARS.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Privacy Risk: There is a risk of individuals being unaware of the collection of QARS data.

Mitigation: To mitigate this risk, FEMA provides notice through the QARS system of records notice and this PIA. FEMA will also provide notice to its employees and contractors at the QARS Privacy briefing. This is required and their attendance will be conformed through a sign-in sheet.

In addition FEMA provides notice of call monitoring and recording via an automated message when disaster assistance applicants call FEMA's NPSCs via the toll-free number and when FEMA employees and/or contractors make phone calls he/she will read a scripted privacy notice during the introduction of the call after verifying that the individual is the applicant, co-applicant, or official



designated to discuss the matter of the call. Lastly, the www.DisasterAssistance.gov website will include a Privacy Act Statement which will serve notice to disaster assistance applicants applying on-line that their information may be used for quality control purposes.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

DHS employees and contractors about whom the system does maintain may seek information by submitting a Privacy Act of Freedom of Information Act (FOIA) request to Disclosure Officer, DHS/FEMA, Records Management Division, 500 C Street, SW, Washington, DC 20472. The data in QARS is not retrieved, nor retrievable, by any unique identifier of the disaster assistance applicant, therefore individual disaster applicants are not allowed access to any information about them that is contained within the recordings included in QARS.

7.2 What are the procedures for correcting inaccurate or erroneous information?

The system does not allow for correction because it is a recording of the transaction by the employee/contractor. The information about DHS/FEMA employees/contractors consists only of data spoken during recorded transactions with disaster assistance applicants, such as the personal identification number (PIN) and the employee name, and therefore is not correctable in QARS.

The information conveyed by disaster assistance applicants in the voice recordings and depicted in the screen captures in QARS is part of the Department of Homeland Security Federal Emergency Management Agency-008 Disaster Recovery Assistance Files system of records [September 24, 2009, 74 FR 48763]. If after reviewing recordings and screen shots FEMA has discovered inaccuracies between screen shots and call recordings, FEMA staff may correct applicant information in the Disaster Recovery Assistance Files held in the NEMIS platform. The Disaster Recovery Assistance Files system of records notice includes procedures for correcting information under the "Notification Procedure" section.

Employees may correct inaccurate evaluations/conclusions about themselves that are based on the recordings in QARS. Procedures are addressed, outlined, and described in the Department of Homeland Security Internal Affairs System of Records notice [73 FR 67529, November 14, 2008], as well as the newly issued QARS SORN.

7.3 How are individuals notified of the procedures for correcting their information?

As noted in section 7.2 above, all notification, record access and record correction procedures are addressed, outlined, and described in the Department of Homeland Security Internal Affairs System of



Records notice [73 FR 67529, November 14, 2008], as well as the newly issued QARS SORN.

As for applicants, as noted in section 7.2 the Disaster Recovery Assistance Files System of Records Notice covers them and includes notification procedures.

7.4 If no formal redress is provided, what alternatives are available to the individual?

In addition to aforementioned procedures in 7.2, and 7.3, DHS/FEMA employees and contractors may request copies of their recordings, and if the call was evaluated it will be available for six years per the NARA schedule (Section 3.3). If the call was not evaluated for quality, it may not be available due to purged call data, per the approved retention schedule for non-evaluated calls and screens. As for applicants, there are available notification and records retrieval mechanisms available to them under the aforementioned Disaster Recovery Assistance Files SORN.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Privacy risk: There is a risk that the FEMA employees and/or contractors who are handling customer service transactions at FEMA's NPSCs may be unaware of the redress procedure associated with QARS.

Mitigation: Those FEMA employees and contractors whose information may be captured in QARS are informed of the appropriate redress mechanisms through the required QARS user training. In addition, the DHS/ALL – 20 Department of Homeland Security Internal Affairs System of Records Notice [73 FR 67529, November 14, 2008], as well as the newly issued QARS SORN, and this PIA describe these procedures.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

QARS has written security policies which define all user rights and roles. The User Manager(s) will have exclusive ability to create user access, user role templates, organization structure, searching, and managing groups and users. All users are required to meet the system-specific privacy awareness training that is administered in a designated training environment. Without completion of the privacy awareness training, user access identifications and passwords will not be issued. Upon completion of all required Privacy awareness training, the User Manager will maintain the log of all users who are issued rights; this information is stored in a password-protected location on the network.

The user roles that are issued include: User Manager, who will have full rights to assign other users, hear and see all data within the system, Quality Control personnel will have the role to listen and



see all recording data for the purpose of evaluating employee/contractor phone personnel, Operations Supervisory and Management staff, will have specific roles to access data of employee/contractors assigned directly to their individual teams.

8.2 Will Department contractors have access to the system?

The system contractor who installs the call recording technology after purchase will have initial rights to work with FEMA IT personnel, in a secured environment. All persons entering FEMA secured IT locations are vetted and escorted at all times by a FEMA employee. Access to the system by contractors will not be available outside of FEMA's IT infrastructure. Contractor access will only be required while onsite during the installation of required vendor hardware, software and government furnished equipment at the National Processing Service Centers. Contractors are required to complete Homeland Security Presidential Directive (HSPD-12) prior to accessing any DHS system.

Contractors hired by FEMA to conduct inbound and/or outbound telephone calls with disaster assistance applicants are required to meet the standard background and fingerprinting requirements for contract employment at all of FEMA's National Processing Service Centers. Contract phone employees will not be assigned login access rights into the call recording system but are supplied the results from quality scores/evaluations, through the FEMA Contracting Office Technical Representative (COTR).

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

All privacy awareness training will follow current systems user requirements and is subject to FEMA training guidelines. Authorized users of the system will also be trained according to their access rights. All users are required to meet the system specific privacy awareness training that is administered in a designated training environment. Without completion of the privacy awareness training, user access IDs and passwords will not be issued. Upon completion of all required privacy training, the User Manager will maintain the log of all users who are issued rights; this information is stored in a password-protected location on the network.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Certification and Accreditation has not been completed for the call recording system at the time of this PIA. The C & A process has been documented and scheduled into the QARS implementation schedule, project lifecycle and is completed prior to the operational use of the system collecting live phone calls. IT systems and applications must meet minimum security requirements and be certified and accredited, as appropriate, prior to their operational use. The software vendor IT personnel will work with FEMA's Office of Cyber Security and Enterprise IT, to ensure the identification and incorporation of appropriate security controls during the acquisition, development, implementation, or operational phase as appropriate. A FEMA/DHS Authority to Operate (ATO) is scheduled for no later than January 2011.



8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

QARS will require specific technical safeguards to prevent misuse of voice recording or screen capture data. The User Administrator(s) will conduct and record defined periodic full trace audits to determine who has accessed any recording in the system for playback. Access to the system is role-based, therefore, FEMA users have access only to the portion of the data required to perform their official duties.

For users who must process and administer the data in the system, a complete security and access control system is in place which complies with DHS Security guidelines, in addition to QARS specific guidelines and which includes automatic revocation of access upon expiration of privileges, role-based access controls that prevent browsing.

FEMA Enterprise Operations and the FEMA Office of Cyber Security is able to monitor system use and determine whether information integrity has been compromised and whether corrective action by the Office of the CIO is necessary, if a breach is determined, the matter is escalated to DHS via the Information System Security Officer (ISSO). Procedures are compliant with Title III of the E-Government Act of 2002 and Federal Information Security Management Act 2002.

Because unauthorized attempts to upload information or change information are prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986, and the National Information Infrastructure Protection Act, FEMA employs software programs that monitor host and network traffic to identify unauthorized attempts to upload or change information or otherwise cause damage.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: There is a risk of unauthorized access to QARS.

Mitigation: FEMA mitigates the risk of unauthorized access to QARS by utilizing role-based access, which ensures access to only the data relevant to the user's official duties. In addition, User Managers maintain a log of all authorized QARS users and conduct will conduct and record periodic full trace audits to determine who has accessed a recording for playback. Lastly, QARS data is maintained on secured servers.

Privacy Risk: There is a risk of unauthorized use of QARS data.

Mitigation: FEMA mitigates the risk of unauthorized use of QARS data through role-based access controls to prevent user 'browsing' of QARS data, automatic access revocation upon expiration of privileges, and monitoring host and network traffic to identify unauthorized attempts to upload or manipulate information in QARS.



Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 What type of project is the program or system?

QARS is an operational type project, the purpose of which is internal employee performance evaluation, training and quality assurance purposes to improve customer service to disaster assistance applicants, a purpose that is consistent with FEMA's mission to improve its capability to respond all hazards and support the citizens of our Nation.

9.2 What stage of development is the system in and what project development lifecycle was used?

The system software was purchased as an off-the-shelf product and will not require any development. The system has been designed to include the required capabilities FEMA has communicated in the Statement of Work to the awarded contractor. The System Engineering Life Cycle (SELC) and Capital Planning and Investment Control (CPIC) requirements have been followed and documented through the current phase of the project. The project is currently at the Execution Process of the Project Management Life Cycle.



9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

This project employs the use of call recording and computer screen captures for both call-related customer service transactions and case review transactions not related to a telephone call. The system entails the collection of PII from disaster assistance applicants, which is included in the Disaster Recovery Assistance system of records, through a new media, the privacy concerns of which have been noted in the preceding sections of this PIA.

Responsible Officials

Thomas R. McQuillan
Privacy Officer
Federal Emergency Management Agency
Department of Homeland Security

Approval Signature

Original signed copy on file with the DHS Privacy Office

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security



APPENDIX A: Privacy Act Statement, Telephone Script Privacy Notice, and Automated Telephone Message Privacy Notice

Privacy Act Statement:

AUTHORITY: The Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended, 42 U.S.C. § 5121–5207 and Reorganization Plan No. 3 of 1978; 4 U.S.C. §§ 2904 and 2906; 4 C.F.R. § 206.2(a)(27); the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Pub. L. 104-193) and Executive Order 13411. DHS asks for your SSN pursuant to the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3325(d) and § 7701(c) (1).

PRINCIPAL PURPOSE(S): This information is being collected for the primary purpose of determining eligibility and administering financial assistance under a Presidentially-declared disaster. Additionally, information may be reviewed internally within FEMA for quality control purposes.

ROUTINE USE(S): The information on this form may be disclosed as generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes using this information as necessary and authorized by the routine uses published in DHS/FEMA – 008 Disaster Recovery Assistance Files System of Records (September 24, 2009, 74 FR 48763) and upon written request, by agreement, or as required by law.

DISCLOSURE: The disclosure of information on this form is voluntary; however, failure to provide the information requested may delay or prevent the individual from receiving disaster assistance.

Telephone Script Privacy Notice:

“We are required by law to provide the following Privacy Act Notice to you. The information that you give the Department of Homeland Security, Federal Emergency Management Agency is collected under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and other authorities. It will be used to determine your eligibility for disaster assistance and to allow FEMA to administer any disaster assistance you receive. DHS/FEMA may share this information outside the agency upon written request, by agreement, or as required by law, to prevent duplication of benefits and to prevent future disaster losses. Providing your Social Security Number and other information is voluntary, but failure to do so may delay or prevent DHS/FEMA from providing you with disaster assistance. Phone calls may be recorded for quality assurance.”

Automated Message:

“We are required by law to provide the following Privacy Act Notice to you. The information that you give the Department of Homeland Security, Federal Emergency Management Agency is collected under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and other authorities. It will be used to determine your eligibility for disaster assistance and to allow DHS/FEMA to administer any disaster assistance you receive. DHS/FEMA may share this information outside the agency upon written request, by agreement, or as required by law, to prevent duplication of disaster benefits and to prevent future disaster losses. Providing your social security number and other information is voluntary, but failure to do so may delay or prevent DHS/FEMA from providing you with disaster assistance. Phone calls may be recorded for quality assurance.”