



Privacy Impact Assessment
for the

Advanced Call Center Network Platform

DHS/FEMA/PIA-021

March 23, 2012

Contact Point

Chris Portesi

Contact Center Telecommunications Section (CCTS)

Texas National Processing Service Center

Federal Emergency Management Agency

(940) 891-8772

Reviewing Official

Mary Ellen Callahan

Chief Privacy Officer

Department of Homeland Security

(703) 235-0780



Abstract

The Federal Emergency Management Agency (FEMA), Office of Response and Recovery (OR&R), Recovery Directorate, Individual Assistance (IA) Division, operates the Advanced Call Center Network (ACCN) Platform. ACCN provides intelligent call routing for FEMA's National Processing and Service Centers (NPSCs) in support of disaster survivors who are applicants for FEMA individual assistance (hereafter referred to as "individual assistance disaster applicants"). The purpose of this system is to provide applicants requesting assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), the highest quality of technology and support services. FEMA is conducting this Privacy Impact Assessment (PIA) because ACCN uses individual assistance disaster applicants' personally identifiable information (PII) to provide status updates regarding their individual assistance disaster application.

Overview

FEMA OR&R, Recovery Directorate, IA Division, operates the ACCN Platform, which functions primarily as an intelligent call routing system. ACCN improves FEMA's ability to meet its emergency management mission under the Stafford Act by improving the efficiency of call routing and offering applicants a quick, automated method for obtaining current information about their individual assistance disaster application consistent with the mandates of Executive Order 13411 - Improving Assistance for Disaster Victims.

The ACCN platform processes the survivor/applicant calls FEMA receives via the toll-free assistance numbers available to the public. ACCN offers the following services to disaster survivors/applicants: 1) an Interactive Voice Response (IVR) system to determine the applicant's requirements; 2) intelligent routing of calls based on needs of the individual calling and established business rules; 3) self-help access to information 24 hours a day, seven days a week; and 4) service assistance provided in English and Spanish.

The ACCN platform utilizes several core components: 1) the Inter-Exchange Carrier (IXC) 800 Network, which is the 1-800 service; 2) the Interactive Voice Response (IVR), which determines applicant requirements by utilizing touch-tone recognition and delivers messages to the caller and also interacts with the FEMA IVR3 database for self-help requests that provide status information without agent interaction; 3) consolidated administration provides established business rules such as hours of operation, disaster specific guidelines, or expected caller delay settings; and 4) the Intelligent Contact Manager (ICM) determines the best way to route the applicant's call based on the keypad options the applicants chose and established business rules. ICM interacts with Call Management System (CMS) to determine the best available Human Services Specialist (HSS) based on availability and minimum wait times. The Nortel Notification System (NNS) Auto Dialer is an additional feature of the system that utilizes the telephone as a means to contact and deliver specific, pre-recorded messages to FEMA customers.

A typical call transaction utilizing ACCN will take place after the President of the United States declares a disaster following a particular damage-causing event. Once a disaster has been declared, a individual assistance disaster applicant may call the toll-free FEMA assistance number. Following the initial recorded FEMA greeting, the caller must specify which language preference, English or Spanish. If a language option is not chosen, the applicant is routed to an HSS. The IVR provides the caller with the URL for the FEMA Disaster Assistance website (<http://www.disasterassistance.gov/>). The applicant is asked to enter the five-digit ZIP code in which the damages occurred. If the call comes outside the hours of operation or an observed holiday, a closed message with hours of operation and the FEMA



Disaster Assistance website (<http://www.disasterassistance.gov/>) are given. If the call is within the hours of operation, then the main menu provides the applicant with three call-routing options: 1) apply for individual disaster assistance; 2) automated self-help/status checks; and 3) helpline, whereby an applicant may update their individual assistance disaster application information or get help from a FEMA HSS. The ICM determines the best available HSS and routes the call or broadcasts the minimum expected delay.

Option 1) directs the caller to the Privacy Act (PA) Notice (attached as Appendix A); the next message provides the applicant with a list of information needed to complete the registration intake interview. After the notice, ACCN routes the applicant to a queue to then connect to the next available live HSS to perform the registration intake interview. The applicant's connection to ACCN ends once they are routed to the queue. An applicant *cannot* complete a registration via telephone keypad inputs through ACCN.

Option 2) directs the applicant to the self-help menu. The applicant is asked to provide the following for verification purposes: FEMA registration ID; the last four digits of the disaster applicant Social Security number; and date of birth. The data entered via keypad is queried against the IVR3 database for authentication. If the information provided by the applicant does not match information in ACCN's IVR3 database, the IVR responds with an error message. Following several failed validation attempts, the applicant is then transferred to a queue to then connect to the next available live HSS. On the other hand, if the information entered is correct, the entered data is authenticated against the IVR3 database, and the applicant receives an automated status update. Once the applicant has completed self-help, the applicant may hang up or opt to be transferred to a queue to speak with an HSS.

Option 3) directs the applicant to a queue, which then connects to a live HSS to assist with individual assistance disaster application updates and/or questions. In this case, the HSS provides the PA statement (attached at Appendix A) to the applicant before requesting any additional information from the applicant.

The data entered via keypad by the applicant, which is queried against ACCN's IVR3 database for authentication, is only used for verification purposes to match the applicant's information to the corresponding application status, and is not retained in the IVR. The IVR3 database, which houses the status information, is fed by the FEMA Operational Data Store (ODS). When records in the ODS are updated, the corresponding record in the IVR3 is refreshed. The IVR3 is dependent on the ODS retention methods and schedule. The IVR3 is only as accurate as the ODS and once a record is removed from the ODS, a subsequent refresh removes the record from the ACCN IVR3 database.

The primary privacy risks within ACCN are the risk of inaccurate or erroneous information being entered by the individual assistance disaster applicant via ACCN because of the manual data entry that ACCN requires. There is also the risk that the information in ACCN's IVR3 database may be retained for a longer period than necessary. To mitigate the risk of erroneous data, FEMA automatically routes individual assistance disaster applicants to live FEMA service personnel if they fail to successfully access their individual assistance disaster application status via ACCN. To mitigate the retention risk, ACCN's retention mirrors that of the ODS that supplies the registration status information to ACCN, in accordance with NARA Authority N1-311-86-1 and as outlined in DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>), files are retained for 6 years and 3 months. Once a record is removed from the ODS, it is also removed from ACCN.



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?

Under the authority of Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5174, and 44 Code of Federal Regulations (CFR) § 206.101, ACCN is authorized to collect information in order to properly administer the programs that are authorized and described in this PIA.

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

The information in ACCN is covered by DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>).

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

This system is currently undergoing a Certification and Accreditation (C&A). The projected issuance of an Authority to Operate (ATO) is May 31, 2012.

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

ACCN is currently consulting with the FEMA Records Management Office for assistance in evaluating whether a new retention schedule is required, or if ODS is sufficient for ACCN. The ODS feeds the ACCN IVR3 database; therefore, the database is dependent on the retention schedule and methods recognized by the ODS. Disaster assistance recovery files are retained for 6 years and 3 months in accordance with NARA Authority N1-311-86-1, item 4C10a & item 4C10b and DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>).

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.

OMB No. 1660-0002 includes the FEMA Form 009-0-1, "Application /Registration for Disaster Assistance."



Section 2.0 Characterization of the Information

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

ACCN uses the following information from individual assistance disaster applicants:

- Date of Birth (DOB)
- Registration ID
- Social Security Number (SSN) (last 4 digits)
- ZIP Code

ACCN (the IVR3 database) provides the individual assistance disaster application status to the disaster assistance applicant. Examples of application status information include:

- Applicant eligibility/ineligibility
- Award amount
- Assistance status

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

The information sources for ACCN are individual assistance disaster applicants and the ODS. The individual assistance disaster applicant uses the self-help option to provide the following information to verify identity when requesting an automated status update:

- DOB
- Registration ID
- SSN (last 4 digits)
- ZIP Code

The ODS supplies applicant information to ACCN's IVR3 database. The information in the IVR3 is updated every 6 hours.

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. ACCN does not use publicly available data or information from commercial sources.

2.4 Discuss how accuracy of the data is ensured.

ACCN assumes the initial accuracy of the original information. During a typical call transaction, an applicant may verify the accuracy of the data used for identification purposes by entering the information at the prompts. After several retries, if the data entered does not match data within the IVR3, the applicant will connect to an HSS, who has the ability to verbally verify the data with the applicant. The applicant can also reach an HSS at the end of the self-help option in order to make adjustments to the data. The data is verbally verified by the HSS as it is modified or updated.



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

Privacy Risk: A privacy risk associated with this system includes FEMA collecting erroneous information from the individual assistance disaster applicant via ACCN during the authentication process due to the manual data entry of information via the telephone keypad.

Mitigation: This privacy risk is mitigated by providing individual assistance disaster applicants with the option of speaking to a HSS to verify and update any information at any time during the call. In addition, FEMA automatically routes applicants to an HSS after the applicant makes several incorrect/invalid authentication attempts via the self-help functionality. Lastly, data received in the IVR3 from the ODS is refreshed every six hours. The refresh action ensures the most current data is available.

Privacy Risk: A privacy risk associated with this system is that FEMA uses the applicant's DOB and last four digits of the SSN for authentication purposes, both of which may not be unique among applicants for a specific disaster.

Mitigation: This privacy risk is mitigated by requiring the applicant's registration ID, which is unique. Furthermore, FEMA provides individual assistance disaster applicants with the option of speaking to an HSS to verify and update any information at any time during the call and automatically routes applicants to an HSS after the applicant makes several incorrect/invalid attempts to access their status information via the self-help functionality. In either of these cases, the applicant will be connected to an HSS outside of ACCN, who will extensively verify the applicant's information using additional data elements (e.g., damaged property address) not maintained in the ACCN IVR3 database.

Section 3.0 Uses of the Information

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

The applicant information in the system (name, registration ID, SSN (last 4 digits), and ZIP code) is used to provide automated status updates to applicants via the IVR. Since it is possible that an applicant may have applied for FEMA individual disaster assistance for multiple Presidentially-declared disasters, the combination of these data elements will ensure that the applicant is receiving the correct information for the specific individual disaster assistance. The last four digits of the SSN are used as a unique identifier for each applicant. Individual assistance disaster application data entered via phone (keypad inputs) is matched with the data in the IVR3 database to provide status to the applicants. The IVR3 database receives its data from the ODS.

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, the project does not use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or anomaly.



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

FEMA OR&R, Recovery Directorate, IA Division operates ACCN. No other FEMA components have assigned roles and responsibilities within ACCN.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: A privacy risk associated with this system includes FEMA using information for purposes other than that for which it was collected.

Mitigation: This privacy risk is mitigated because FEMA has implemented the following controls: first, ACCN does not retain the PII that the applicant inputs via the telephone keypad; secondly, FEMA has limited the PII requested from the applicant to only that which is necessary to distinguish with specificity both the applicant and the particular disaster registration for which the status is requested.

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.

Prior to the individual assistance disaster applicant providing any information, FEMA provides notice about ACCN's collection of information through a recorded, automated PA statement (attached at Appendix A) provided at the time the applicant's call is connected via ACCN. In addition, individual assistance disaster applicants who choose option 1 to apply for individual disaster assistance receive an automated message prior to connecting to a live HSS. Furthermore, in the event a HSS receives a call where there is more than one applicant on the same call, the HSS will give notice to all subsequent applicants on the same line.

Though outside of ACCN, FEMA provides notice of the original collection at the time of collection for the purpose of providing individual disaster assistance through its DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>), and via a PA statement (attached at Appendix A) included on the Application/Registration for Disaster Assistance form.

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

At the beginning of each call, individual assistance disaster applicants are presented the automated PA statement (attached at Appendix A). If not in agreement, the individual assistance disaster applicant may refuse to continue by opting out of the ACCN system by ending the call. In addition, the applicant may also choose to opt-out at any time after being connected to a FEMA HSS.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: A privacy risk associated with this system is that individual assistance disaster applicants using ACCN will not receive the PA statement (attached at Appendix A) that it is collecting their information.



Mitigation: This privacy risk is mitigated because FEMA provides a PA statement (attached at Appendix A) to the individual assistance disaster applicant through ACCN via an automated, recorded message prior the applicant being asked to provide any information. In addition, if an applicant is connected to a HSS for assistance, the HSS will provide a PA statement (attached at Appendix A) prior to asking the applicant to provide any information.

Section 5.0 Data Retention by the project

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

ACCN retains its information in line with the retention and disposal schedule for the ODS because ODS is the source of the registration status information maintained in ACCN's IVR3. ACCN does so because of the operational nature of the data store. As long as an applicant's information is present in ODS, the applicant should have access to his or her status through ACCN. Disaster assistance recovery files are retained for six years and three months in accordance with FEMA Records Schedule No. N1-311-86-1 and DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>).

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: A privacy risk associated with this system is that ACCN retains the information in the IVR3 database longer than is necessary.

Mitigation: This privacy risk is mitigated because ACCN retains the data according to the schedule in place for the ODS, so that as long as the applicant's record is in ODS, ACCN will be able to provide accurate status information. Furthermore, ACCN is linked to the ODS, such that when a record is removed from ODS, a subsequent data refresh will remove the record from ACCN. The information in ACCN is refreshed every six hours.

Section 6.0 Information Sharing

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

FEMA does not share the individual assistance disaster application information with any organization outside of FEMA except as allowed by the DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>).

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

Any sharing of ACCN records is compatible with DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) and is only done consistent with the published routine uses therein which are also compatible with the original purpose of collection.



6.3 Does the project place limitations on re-dissemination?

Any sharing of ACCN records is compatible with DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) and is only done consistent with the published routine uses therein which are also compatible with the original purpose of collection. In addition, FEMA does not share information without a demonstrated “need to know” for the information requested.

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

As identified in the DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>), requests for individual disaster assistance records within ACCN are made to the DHS/FEMA Disclosure Office who maintains the accounting of what records were disclosed and to whom.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: A privacy risk associated with this system is that the information in ACCN could be erroneously disclosed.

Mitigation: This privacy risk is mitigated because FEMA only shares the information in ACCN outside of DHS pursuant to the routine uses found in the DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) and only pursuant to a written request submitted to the FEMA Disclosure Office.

Section 7.0 Redress

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

The information that individual assistance disaster applicants input through ACCN to access their individual assistance disaster application status is not unique to ACCN; it is part of the DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>). As such, individual assistance disaster applicants may consult that SORN for additional information regarding how to access their respective individual assistance disaster application files via a PA or Freedom of Information Act (FOIA) request. Additionally, while using ACCN an applicant may choose the option to connect directly to a live HSS who can verify and update the applicant’s information.

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

Individual assistance disaster applicants may submit an amendment to their information in the aforementioned DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) following a PA request. Specifically regarding ACCN, ACCN automatically routes applicants to a live HSS if the information that the applicant enters cannot be matched by the IVR database to a record in the ODS. Once connected to an HSS, the applicant can verify and correct or update their information.



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

DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) provides notice regarding how individual assistance disaster applicants can correct their individual assistance disaster application information. Regarding ACCN, this PIA and a HSS may be reached via the toll-free number to provide notice to applicants regarding correcting their information.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: A privacy risk associated with this system is that individual assistance disaster applicants using ACCN will be unaware of the redress process.

Mitigation: This privacy risk is mitigated because ACCN automatically routes applicants to a live HSS to verify their information if the information they enter does not return a status record from the ODS via the self-help option. In addition, as noted above, this PIA and the DHS/FEMA 008 Disaster Recovery Assistance Files System of Records, 74 FR 48763, September 24, 2009 (<http://edocket.access.gpo.gov/2009/E9-23015.htm>) offers notice of redress.

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

FEMA ensures that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

All FEMA ACCN users are required to successfully meet privacy awareness and information security training requirements according the FEMA training guidelines, as well as program-specific ACCN training.

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

In instances where the personal information of applicants stored in ACCN's IVR3 database is viewable, it may only be viewed by personnel with the appropriate user roles and a relevant "need to know." This ensures that privacy and information safeguarding requirements are met by limiting access to sensitive information to only those users whose operational role and mission warrants such access. The information within the system is further protected by the use of identification and authentication controls, access control lists, and physical access controls to the individual assistance disaster application. Also, there are standard operating procedures (SOP) for reference and an information system security officer (ISSO) who provides security guidance over the project.



8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

Currently, ACCN does not require information sharing agreements or MOUs, however, the project has a process to review such agreements as necessary. This process involves program stakeholders, information system security officers, the Office of Chief Counsel and the FEMA Privacy Officer. Similarly, ACCN will leverage its stakeholders in the process of reviewing and approving any new uses for the project. If ACCN contemplates new uses for the platform or its information, FEMA will update the required privacy compliance documentation.

Responsible Officials

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

Approval Signature

Original signed copy on file with the DHS Privacy Office

Mary Ellen Callahan
Chief Privacy Officer
U.S. Department of Homeland Security



Appendix A

Privacy Notice Delivered Via Phone:

“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.”