



Privacy Impact Assessment
for the

FEMA Smartphone Application with Disaster Reporter Feature

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Abstract

The Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA) Office of External Affairs (OEA), Public Affairs Division sponsors the Smartphone Application with the Disaster Reporter feature, which provides users the ability to upload and transmit photos and text descriptions from the scene of a disaster via any smartphone to FEMA. FEMA then displays the user provided information on a public-facing map which allows FEMA, stakeholders, and members of the public to view the compiled crowd source information for situational awareness and to help inform decision making. The Disaster Reporter Application (app) does not collect, use, or transmit personally identifiable information (PII) from users; however, it does collect geospatial information (location data) pertaining to where the photos were taken. FEMA is conducting this Privacy Impact Assessment (PIA) to address the privacy impact of FEMA's use of the smartphone geospatial functions with mobile media for delivering information to the public.

Introduction

As smartphones and personal wireless devices become more prevalent in society, organizations find more ways to connect with the public and offer real-time or near real-time information and services. With efforts for more open and transparent operations, DHS is finding more ways to connect with the public including the development of mobile apps. FEMA is leveraging this technology to submit, view, and use crowd source information to support situational awareness and critical decision making. The purpose of the App is two-fold:

1. To provide the ability for users to upload photos and text descriptions from the scene of a disaster using the FEMA Smartphone app. This allows stakeholders the opportunity to share information with others on a central map.
2. To display this information on a public-facing map. This allows stakeholders and members of the public to view crowd source information for situational awareness and to help inform their decision making.

The App

The use of this app is voluntary; users must download the App onto their smartphone in order to use the App functions. When an app user encounters a disaster (e.g., flooded house, downed power lines) and wants to share it, he or she must first download and open the FEMA Smartphone app on his or her smartphone. Then, the user must click on the Disaster Reporter section in the App. The first time a user clicks on this section, he or she is asked to review and agree to the Terms & Conditions, which informs him or her that, among many things, the App requires he or she to enable location based services to submit content and that any photos or text containing PII will not be published. From the Terms & Conditions, users are able to click on a link to the Privacy Policy, which informs users that no PII is collected or transmitted to FEMA through the App, only the geo-tagged photos and text are transmitted (see Appendix A for Terms and Conditions and Appendix B for Privacy Policy). All content (photo or text) that is submitted must be geo-tagged with longitudinal and latitudinal coordinates. The location information is necessary in order to fulfill the purpose of the App. Members of the public, FEMA, and



stakeholders require location data to make informed decisions and have appropriate situational awareness. The location data is only associated with the scene of the disaster, not the individual users. The location data is only transmitted when the users actively submit the photo and text information using the App. The App does not and is not designed to constantly collect and/or transmit the users' location data to FEMA.

The users can then click the “take photo” or “choose from library” buttons to take the picture or access the photo library section on the phone, and select the appropriate image to upload. FEMA staff review and moderate photos that are uploaded. Any photos containing PII or identifying information (e.g., images of individuals on personal property, home addresses, and license plates) are not used or shared. Content that is not posted publicly is archived for records management purposes. FEMA staff also moderate any inappropriate or unrelated photos that are uploaded (see Appendix C for moderation guidelines). Once the user chooses a photo, he or she can fill out the text description field to provide information and context. When the users click “submit” the photo, text, and geo-tagged information is then sent to a FEMA content management system where it goes through the FEMA approval process. Once the photo and text are approved, they are published on a public-facing map on the FEMA.gov website. None of the user's PII (i.e., user name, cell phone number) is collected or transmitted during this process. This App does not include advertisements or host advertisements from third-parties. Additionally, users are not required to provide any PII to download or use the App.

The Public-Facing Map

Members of the public, FEMA, and stakeholders can access the public-facing map on the FEMA.gov website. On the map page, users can view the compilation of crowd source data submitted through the App. Data points on the map are plotted using the geo-coordinates (to the street level). When users click on the data point, they are able to view the publicly submitted content just as if they were viewing social content on any other social media site. Again, the map data does not include any PII of the user who submitted the information. Users of the public-facing map are not required to register or submit any information in order to view the crowd source map. It is open to the public for viewing. Additionally, users are not required to download the FEMA app in order to view the crowd source map. They simply visit the FEMA.gov site.

The FEMA OEA Public Affairs staff (and other personnel trained by the Public Affairs Division) have the ability to review photos prior to publishing and to remove content at any time for any reason.

Fair Information Practice Principles (FIPPs)

The Privacy Act of 1974 articulates concepts of how the federal government should treat individuals and their information and imposes duties upon Federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. Section 222(2) of The Homeland Security Act of 2002 states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974.

In response to this obligation, the DHS Privacy Office developed a set of Fair Information Practice Principles (FIPPs) from the underlying concepts of the Privacy Act to encompass the full breadth



and diversity of the information and interactions of DHS. The FIPPs account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure.

DHS conducts Privacy Impact Assessments on both programs and information technology systems, pursuant to Section 208 of the E-Government Act of 2002 and Section 222 of the Homeland Security Act of 2002. Given that the Disaster Reporter Application is a mobile application, rather than an information technology system as that term is used in the E-Government Act, this PIA examines the privacy impact of the App as it relates to the DHS construct of the Fair Information Practice Principles.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a SORN and PIA, as appropriate. There should be no system the existence of which is a secret.

The FEMA App with the Disaster Reporter feature is designed to be a user-based system. The Privacy Policy clearly describes the function of the App, the type of information that will be collected, how the information will be used, and with whom the information will be shared. The Terms & Conditions in the Disaster Reporter section of the App clearly state that photos need to be geo-tagged in order to use this section of the App. Users are asked to review and agree to the Terms & Conditions when they go into the disaster reporter section of the App for the first time. From the Terms & Conditions, users can click on a link to bring them to the Privacy Policy. The Terms & Conditions and Privacy Policy are always available for users to go back and re-read. If the user already has his or her geo-location turned on, he or she can use the disaster reporter feature and not have to take additional steps. If the user does not have his or her geo-location turned on, he or she cannot fill out the submission form or transmit any data. Every time FEMA publishes a new version of the App, the users will be asked to review the Terms & Conditions again, even if it has not changed. Together the Terms and Conditions, Privacy Policy, and this PIA establish this principle of transparency regarding FEMA's use of the App.

2. Principle of Individual Participation

Principle: DHS should involve the individual in the process of using PII. DHS should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of PII and should provide mechanisms for appropriate access, correction, and redress regarding DHS's use of PII.

The App is user based, and all users voluntarily download and use the App. FEMA developed the App so that users are able to actively share photos of and text describing disaster scenes. In order for the App to fulfill its purpose, the photos and text submitted by the App users must be geo-tagged to provide the location of the disaster scene. With this information, members of the public, FEMA, and stakeholders viewing the public-facing map can obtain situational awareness and support critical decision making. If a user does not want to use the disaster reporter function of the App, or transmit location data, he or she can still use every other section of the App without turning on the geo-location on the smartphone. While users can not cancel or remove photos and text after submitting to FEMA, users may



notify FEMA of any concern they have with any photo by sending email to FEMA-New-Media@fema.dhs.gov.

3. Principle of Purpose Specification

Principle: DHS should specifically articulate the authority which permits the collection of PII and specifically articulate the purpose or purposes for which the PII is intended to be used.

The App does not collect or transmit any PII. Users are not required to provide any PII in order to use the App or view the public-facing maps. The purpose of the Disaster Report app is to: 1) to provide the ability for users to upload photos and text descriptions from the scene of a disaster, and 2) to display the information and geospatial information on a public-facing map, which allows FEMA, stakeholders, and members of the public to view crowd source information for situational awareness and to help inform their decision making, as appropriate. The purpose of this app aligns with FEMA's overall mission under the Robert T. Stafford Disaster Relief and Emergency Act, as amended, to support our citizens and first responders to ensure that as a nation, we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.

4. Principle of Data Minimization

Principle: DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

In developing the Disaster Reporter, FEMA determined it did not need any PII and would review all photos and text before posting the information to the public-facing map to ensure that no PII or inappropriate content is posted. In addition, DHS does not receive any PII or user information from third parties, including cell phone service providers and the App service provider. The only information transmitted with the photos and text is location data (i.e., latitudinal and longitudinal coordinates). The location data is only transmitted when the users actively submit the photo and text information using the App. The App does not and is not designed to constantly collect and/or transmit the users' location data to FEMA.

5. Principle of Use Limitation

Principle: DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.

The App does not require users to register or provide any PII in order to submit data. Furthermore, no information related to the user or the cell phone (e.g., cell phone number) is transmitted to FEMA. Additionally, no user information is required to view the public-facing map. Therefore, no PII is used or shared by FEMA. The only information that is transmitted through the App, along with the photos and text description, is the geo-coordinates associated with the photo. All photos are geo-tagged



to provide situational awareness and support decision making. Members of the public, FEMA, and stakeholders can all access and view the public-facing map for these purposes.

The Terms and Conditions, Privacy Policy, and this PIA establish FEMA's narrowly defined use of the data collected and used in conjunction with the App.

6. Principle of Data Quality and Integrity

Principle: DHS should, to the extent practical, ensure that PII is accurate, relevant, timely, and complete, within the context of each use of the PII.

Disaster photos are submitted directly by the user. Users have the opportunity to review the photo and text description prior to data submission. FEMA staff review all photos and text prior to posting them on the public-facing map. For example, any photos containing PII or identifying information (e.g., images of individuals on personal property, home addresses, and license plates) will not be used or shared. FEMA staff moderate any inappropriate or unrelated photos that are uploaded. FEMA also reserves the ability to remove content at any time for any reason.

Currently, FEMA is not limiting the amount of data that is available over time. As the product matures, FEMA will accept feedback from internal/external stakeholders on all aspects of the app. At this point, because the tool is meant to be a situational awareness tool, the most recent data will likely be of more value to its users. Changes cannot be made to the images once they are posted on the map. And older images are not updated/replaced by new images. Each image will have the date the photo was taken, as well as the date it was uploaded onto the map, which is visible to the public.

7. Principle of Security

Principle: DHS should protect PII (in all forms) through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

FEMA does not collect any PII from users at any time, whether during data submission or when individuals view the public-facing map. Therefore, the privacy risks are minimal. FEMA is using Secure Socket Layer and Application Programming Interface keys to ensure that there is a secure connection when photos and text are uploaded from the App.

8. Principle of Accountability and Auditing

Principle: DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

All FEMA personnel receive annual privacy awareness training. Additionally, FEMA staff are trained on the moderation policy to identify when PII or other identifying information is submitted in the photo or text. Any photos or text containing PII or other identifying information will not be posted on FEMA.gov. If a member of the public or other stakeholder has a concern with a photo that has been approved, he or she can email FEMA with the concern.



Conclusion

The FEMA Smartphone App Disaster Reporter empowers individuals to share critical information regarding disasters, and leverages crowd source information to allow members of the public and stakeholders to obtain situational awareness and support decision making. The App is in alignment with FEMA's overall mission to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards. The App was designed with privacy considerations in mind. Users are not required to provide any PII to download and use the App, or to access and view the public-facing maps. The App does not transmit any PII. The App only transmits the necessary information – the photo, text description, and location data – to FEMA. Furthermore, FEMA staff receive training to review all content that is submitted through the App to identify any PII or other identifying information. Any photos or text containing such content will not be published. FEMA has implemented these safeguarding measures to ensure that the App is not only fully functional, but also protects individual privacy.

Responsible Officials

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

Approval Signature Page

Original signed and on file with the DHS Privacy Office.

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



Appendix A: Terms and Conditions

Disaster Reporter Terms & Conditions

Purpose

1. The purpose of the FEMA Disaster Reporter is to crowd source and share disaster-related information for events occurring within the United States, allowing citizens, first responders, emergency managers, community response & recovery teams, and others to view and contribute information on a publicly accessible map.
2. The Disaster Reporter is a feature in the [FEMA App](#) that allows users to take a photograph in a disaster area and submit it, along with a short text description, for public display on a map.

Key Points

1. You must be 18 years or older to submit a photograph and/or text description.
2. If you are in need of emergency assistance, please call 9-1-1.
3. Do not put any person or property at risk of harm to use the Disaster Reporter.
4. Do not use the Disaster Reporter to report criminal activity. If you have information for law enforcement, please contact your local police department.
5. By submitting a photograph, you acknowledge that you own the copyright to the photograph and any associated text description and grant FEMA a non-exclusive, royalty-free, unconditional, world-wide license to use, display, and redistribute a copy of the photograph and any text description in any format to any entity. FEMA will attribute the photograph and any text description to "FEMA Disaster Reporter User."
6. All content is moderated, meaning that photographs and text descriptions will be reviewed prior to being posted and are subject to rejection based on the Content Guidelines listed below.
7. FEMA does not guarantee or warrant that any information posted through the Disaster Reporter is correct and disclaims any liability for any loss or damage resulting from reliance on any such information. FEMA will not verify, does not warrant or guarantee, and assumes no liability for anything posted through the Disaster Reporter.
8. FEMA does not require users to create an account in order to submit content. All users need is a smartphone and the [FEMA App](#).
9. FEMA reserves the right to modify this policy at any time.
10. For questions, comments, or to ask that a photograph be removed, please e-mail FEMA-New-Media@fema.dhs.gov.

Content Guidelines

1. Only disaster-related photographs and text descriptions of events taking place in the United States will be accepted.
2. All submitted photographs must be geo-tagged.



3. All content is moderated to ensure that it is disaster-related and on-topic. All approved content will be made publicly available.
4. If part of a photograph or text description is deemed inappropriate, then the entire submission will be rejected.

Content (Photographs & Text Descriptions) That Will Not Be Accepted

1. Content that is not disaster-related and/or off-topic.
2. Content that includes abusive or vulgar language, hate speech, personal attacks, or similar content.
3. Content that includes personal information such as: a FEMA case number, social security number, identifiable addresses, automobile license plates, or any other information protected by the Privacy Act of 1974.
4. Content that promotes any commercial entities or products.
5. Content that contains information on fundraising campaigns or partisan political activity.
6. Content that violates any person's reasonable expectation of privacy or other privacy interest, including, but not limited to, people on private property, children, interiors of homes, deceased or injured persons, and interiors of hospitals or other medical facilities.

The Disaster Reporter is Not:

- A place to report fraud. Persons alleging FEMA benefits fraud should report complaints directly to the National Center for Disaster Fraud Hotline by calling (866) 720-5721 or via e-mail at disaster@leo.gov.
- A place to send in photographs for official damage assessments or housing inspections, or questions or status inquiries about your specific case involving FEMA. Instead, please contact FEMA by visiting www.DisasterAssistance.gov, or by calling (800) 621-3362 or TTY (800) 462-7585 for people with speech or hearing disabilities.
- A place to submit unsolicited proposals or other business ideas or inquiries. For more information, please visit [doing business with FEMA](#).
- A place to submit a claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy.
- A place to apply for a [career with FEMA](#) or inquire on the status of your job application. FEMA job openings are available on USAJobs.gov.
- A substitute channel for Department of Homeland Security services or general questions. Instead, please visit "Contact Us" on www.dhs.gov.

Privacy Policy

All approved content will be made publicly available. FEMA will collect and retain all photographs and text descriptions in our records. For more information, please see the [Privacy Policy](#).



Appendix B: Privacy Policy

FEMA Smartphone App

By downloading the FEMA App, the user agrees to the following terms:

1. FEMA will make all reasonable attempts to keep this App bug free and up –to date. However, this App and all information, content, and materials included on or otherwise made available to you through this App are provided by FEMA on an "as is" and "as available" basis. FEMA makes no representations or warranties of any kind express or implied, as to the operation of this site or the information, content, or materials included on or otherwise made available to you through this App. You expressly agree that your use of this site is at your own risk. To the full extent permissible, by applicable Federal law, FEMA disclaim all warranties, express or implied, including, but not limited to, implied warranties of merchantability and fitness for a particular purpose. FEMA does not warrant that this App, information, content, or materials included on or otherwise made available to you through this App are free of viruses or other harmful components. FEMA will not be liable for any damages of any kind arising from the use of this App from any information, content, or materials, included on or otherwise made available to you through this App, including, but not limited to direct, indirect, incidental, punitive, and consequential damages.
2. FEMA does not see, collect, or store any personal data you enter into the App. Any and all information you enter into the App is stored on your device and not on FEMA’s website or server. As such, FEMA is not responsible for any damages resulting from the loss or theft of that information.
3. The App only transmits photos/texts uploaded by the user, along with geospatial coordinates; the App does not transmit any personal information (i.e., phone number, user’s name) associated with your device.
4. FEMA does use Bing Maps (FEMA does not endorse any non-Federal government entities or products) on this App. While Microsoft has advised FEMA that it does not collect any personal information, it does collect the number of times a map is accessed via the mapping feature on the FEMA App. This information is not shared with FEMA. FEMA is not responsible for any information collected by Microsoft.
5. While FEMA does not charge for the use of this App, normal carrier data fees may apply. Please consult your carrier to discuss any charges related to the use of this App.
6. FEMA is a Federal Government entity and as such does not endorse any non-Federal US Government entities. You may not use this App or any of the information in this App to imply that FEMA endorses you or your organization.
7. This App should not be used to contact FEMA during an emergency. If you are in need of emergency assistance please contact 9-1-1. If you need to register for FEMA assistance please visit the FEMA mobile site at m.fema.gov.



Appendix C: Moderation Guidelines

Guidelines and checklist for moderators:

1. Is the photo and/or text description disaster-related and from a location within the United States?

Examples (which don't have to be for Stafford Act disasters):

- a. Wildfire
- b. Fire
- c. Flooding
- d. Sink hole
- e. Smoke rising
- f. Downed trees
- g. Destruction from natural or human disasters

If it's disaster-related, proceed to #2.

If not, don't approve it.

2. Does the photo or the text description indicate or suggest the user submitted the content for damage assessments or housing inspections?

If the content is for formal damage assessments, don't approve it.

If the photo is not for damage assessments, proceed to #3.

3. Does the photo and/or text description contain any of the following?

- a. Personally identifiable information (PII)
 - i. Names
 - ii. Social Security number
 - iii. FEMA Case numbers
 - iv. National Flood Insurance Program account numbers
 - v. Phone numbers
 - vi. Email addresses
 - vii. Identifiable home addresses (i.e., Street number)
 - viii. License plates
- b. Photos of people on personal property
- c. Children
- d. Interiors of homes
- e. Deceased or injured persons
- f. Interiors of hospitals
- g. Interiors of other structures where there is a right to privacy
- h. Abuse or vulgarity
- i. Spam
- j. Hate speech
- k. Personal attacks
- l. Threats



- m. Indecent photos
- n. Commercial or Business Advertising
- o. Partisan Political Campaigns/Fundraising

If it contains anything from the above list, don't approve it.

If it doesn't contain anything from the above list, proceed to #4.

4. Does the photo and/or text description contain anything else you feel is inappropriate?

If you feel the photo or text description is inappropriate, don't approve it.

If you have questions, then ask. Send an email to the following list and include the photo ID number:

shayne.adamski@fema.dhs.gov; brittany.trotter@fema.dhs.gov;

jason.lindsmith@fema.dhs.gov; FEMA-New-Media@fema.dhs.gov

If you don't have any other concerns, approve the photo.

5. Repeat the steps.