



Privacy Impact Assessment  
for the

# Quality Assurance Recording System

**DHS/FEMA/PIA-015**

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## Abstract

The Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA), Office of Response and Recovery (ORR), Recovery Directorate, National Processing Service Center (NPSC) Division operates the Quality Assurance Recording System (QARS). QARS captures telephone and computer screen recordings for the purpose of evaluating employee and contractor performance. These evaluations are designed 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 captures personally identifiable information (PII) about Individual Assistance (IA) and Public Assistance (PA) applicants and FEMA employees and contractors.

## Overview

FEMA's NPSC Division operates QARS to evaluate employee and contractor performance. These evaluations help FEMA improve its customer service to disaster assistance applicants and allows FEMA to develop employee and contractor training. The purpose of QARS is consistent with FEMA's mission under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended<sup>1</sup> and Executive Orders 13411,<sup>2</sup> 12862,<sup>3</sup> and 13571<sup>4</sup> to improve its response and recovery efforts to all hazards, emergencies, and disasters. QARS enables FEMA to monitor, evaluate, and assess the performance of their employees and contractors to improve customer service to individuals seeking disaster assistance. FEMA NPSC components using QARS include the Quality Control Department, NPSC Supervisory staff, Contract Oversight Management Section (COMS), and the Training Department.

Through QARS, NPSC Human Service Specialist (HSS) supervisors and Recoup and Appeal (RAD) staff are able to assess the quality of service provided to IA applicants. Customer Satisfaction Analysis (CSA) supervisory staff ensures delivery of quality service by those performing customer satisfaction assessments of both IA and PA recipients. The system also assists the NPSC Training Department and National Coordination Team Assistance Group (NCT AG), by providing consistent guidance and training recommendations based on findings from the recordings. QARS provides COMS with insight to measure the level of quality and performance provided by contract staff both within the NPSC or providing support remotely, such as language translation services. QARS also allows FEMA to increase the cost-effectiveness of its quality evaluation processes. QARS records and can playback calls at the discretion of the supervisor or quality control reviewer. QARS records are used as training tools for employees or contractors during their quality control evaluation process.

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<sup>1</sup> 42 U.S.C. §§ 5121-5207.

<sup>2</sup> Executive Order 13411, Improving Assistance for Disaster Victims (August 29, 2006), *available at*, <http://www.gpo.gov/fdsys/pkg/FR-2006-09-06/pdf/06-7492.pdf>.

<sup>3</sup> Executive Order 12862, Setting Customer Service Standards (September 11, 1993), *available at*, <http://www.archives.gov/federal-register/executive-orders/pdf/12862.pdf>.

<sup>4</sup> Executive Order 13571, Streamlining Service Delivery and Improving Customer Service (April 27, 2011), *available at*, <http://www.gpo.gov/fdsys/pkg/FR-2011-05-02/pdf/2011-10732.pdf>.



QARS collects and maintains voice recordings and the corresponding desktop screen snapshots of the following transaction types:

- 1) FEMA employees or contractors and IA applicants for assistance or as part of the customer satisfaction assessment process;
- 2) FEMA employees or contractors and other FEMA employees supporting NPSC agents who assist disaster applicants;
- 3) FEMA employees or contractors during non-call-related IA case review;
- 4) FEMA supervisory staff, quality control specialists, or contract oversight specialists' evaluation of employee or contractor calls and case review screen transactions, and generated quality result in QARS; and
- 5) NPSC supervisors, quality control specialists, or training specialists evaluations to ensure alignment and consistency across the enterprise.

### *Voice and Desktop Screen Recording During a Telephone Call*

QARS records 100% of all incoming and outgoing calls to and from FEMA's designated disaster assistance helplines, customer satisfaction assessment responses, and internal lines used for HSS support by NCT AG Assistance Group. FEMA may reduce this percentage during times of extremely high call volumes. Voice recordings are initiated when:

- an IA applicant calls FEMA's 1-800 line regarding disaster assistance;
- an IA or PA applicant calls FEMA (or is called by FEMA) in response to FEMA's request for a customer satisfaction assessment;
- a FEMA employee or contractor calls the NPSC internal departments for support during a transaction with a disaster assistance applicant; or
- a FEMA employee or contractor calls through designated lines in the course of the registration and case review process.

The call recording starts once the caller and FEMA employee (or contractor) are connected on designated FEMA telephone lines.<sup>5</sup> Calls placed to and from non-designated lines are not recorded in QARS. FEMA provides notice of recording to callers via a pre-recorded Privacy Act Statement while callers wait in queue to speak with a FEMA employee or contractor. FEMA employees and contractors who speak with applicants read a scripted Privacy Notice.<sup>6</sup> Employees and contractors are informed during training that their calls and screenshots will be recorded and monitored for quality assurance.

FEMA employee or contractor desktop computer screens may also be recorded to accompany the voice transaction. If a call also includes desktop screen captures the screen recording begins simultaneously with the voice recording if a call also includes desktop screen

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<sup>5</sup> Designated FEMA lines are pre-determined phone lines used for inbound and outbound calls to or from disaster assistance applicants equipped with recording capabilities.

<sup>6</sup> When callers dial into the NPSCs they are placed in a queue in which they hear a recorded Privacy Act Statement. If an applicant is called the script will be read by the FEMA employee or contractor contacting the applicant.



captures. Recording the desktop screens during voice transactions allows the quality control specialist or supervisor to observe the FEMA employee or contractor's individual disaster assistance data entry and case review accuracy.

Voice and screen recordings that are evaluated in QARS are archived pursuant to NARA Authority N1-311-08-1 and FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-1,"<sup>7</sup> for six years to allow time to resolve any personnel matters that may arise from the use of QARS data for performance evaluations or to determine qualifications for continued employment. FEMA purges recordings that are not used in an evaluation within 45 days, per NARA Authority N1-311-08-1 and FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-2."<sup>8</sup>

### Desktop Screen Recording Not Related to a Telephone Call

In addition to answering telephone calls, FEMA employees and contractors process disaster assistance applications to determine eligibility by reviewing the applicant's case file maintained in the IA IT system (formerly named National Emergency Management Information System (NEMIS)-IA).<sup>9</sup> During this case review and processing, QARS records a random percentage of desktop computer screens based on the FEMA employee or contractor's identification or particular work assignment.

A portion of the screen-only recordings are evaluated in QARS, archived, and held for six years to allow time to resolve any personnel matters that may arise from the use of QARS data for employee or contractor performance evaluations or to determine qualifications for continued employment. FEMA purges recordings that are not used in an evaluation of a FEMA employee or contractor within 45 days.

### Quality Evaluation

QARS maintains the results of the evaluations performed by a supervisor, quality control specialist, contract specialist, or training specialist for performance management purposes. FEMA sets 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. QARS recordings are selected randomly or targeted for evaluation of the quality of service delivered to the disaster assistance applicant. The evaluator uses the appropriate quality form to assess the employee or contractor's quality of work along with a system-generated result. These results are generated by weighing various evaluation criteria. QARS tabulates these results through supervisors grading of transactions of employees interactions with members of the public and with other FEMA employees. QARS then assigns scores to each criterion. The tabulation is based on the combination of these scores and weights. QARS stores the quality result and retrieves it using the employee or contractor's name and user

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<sup>7</sup> NARA Authority N1-311-08-1, available at [http://www.archives.gov/records-mgmt/rcs/schedules/departments/department-of-homeland-security/rg-0311/n1-311-08-001\\_sf115.pdf](http://www.archives.gov/records-mgmt/rcs/schedules/departments/department-of-homeland-security/rg-0311/n1-311-08-001_sf115.pdf).

<sup>8</sup> See *id.*

<sup>9</sup> DHS/FEMA/PIA-027 – [National Emergency Management Information System-Individual Assistance \(NEMIS-IA\) Web-based and Client-based Modules](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_nemis_ia_20120629.pdf), available at [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_fema\\_nemis\\_ia\\_20120629.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_nemis_ia_20120629.pdf).



identification number for subsequent review and evaluation. QARS quality evaluations are typically made available to the employee or contractor for review and possible discussion.

FEMA also determines training opportunities for its employees and contractors based on the evaluations stemming from the QARS recordings. Contract staff calls are evaluated by FEMA supervisory, quality control, or contract oversight staff according to the contract provisions between FEMA and the contracting entity. Calibration sessions are conducted in which representatives from each NPSC perform evaluations on recorded transactions, compare results, and establish consensus on the quality management process to ensure calls are evaluated in a consistent manner across the NPSCs.

### *FEMA Employee and Contractor Desktop Software Usage*

Supervisory and performance management staff use QARS to analyze the performance of employees or contractors. To do so, they document how the employees and contractors navigate through the various software applications used to provide customer service to applicants. Application usage is logged by QARS and used to assess current processes and employee performance to optimize efficiency within the NPSCs by providing data related to the length of time spent in systems or applications throughout the day.

The information collected by QARS includes transactional data about the system applications accessed by the employee or contractor,<sup>10</sup> including the user's name, work station ID, and the name of the application(s) accessed. QARS also logs website addresses (Uniform Record Locators (URL)) and Outlook emails.

## **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?**

Per 5 U.S.C. § 301, the head of an Executive department may prescribe regulations for the conduct of the department's employees. FEMA has promulgated regulations regarding performance management at 5 CFR Part 430.102. The Federal Sector Labor Management Relations Act<sup>11</sup> requires agencies to develop performance appraisal systems. FEMA's agency management right allows agency managers to determine retention practices pursuant to 5 U.S.C. § 7106(a) and 29 U.S.C. § 204(b). In addition, QARS satisfies statutorily required fraud, waste, and abuse controls.<sup>12</sup>

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

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<sup>10</sup> Application access information is designed to record the amount of time a user spends in each application while he or she is logged into his or her work-station. This function does not entail the screen recording of activity. For example, if a user accesses website for their personal use (such as online banking) at any point while logged into his or her work-station only the name of that application and the time spent on the application is logged.

<sup>11</sup> 5 U.S.C. § 4302.

<sup>12</sup> 6 U.S.C. § 795.



The IA applicant information in QARS collected through interaction with disaster assistance applicants or during the case review is part of the DHS/FEMA-008 Disaster Recovery Assistance (DRA) Files System of Records Notice (SORN).<sup>13</sup> The PA applicant information in QARS captured through the customer satisfaction assessment process is part of the DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan System SORN.<sup>14</sup>

Although the recordings include the disaster assistance applicant's PII, the recordings are only retrievable using FEMA employee or contractor information. FEMA accesses the information in QARS by using the employee or contractor's name or his or her user identification number. The system does not retrieve information by the individual disaster assistance applicant. The collection of the employee or contractor quality assurance information is covered by DHS/FEMA-002 Quality Assurance Recording System SORN.<sup>15</sup>

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

Yes. Authority to Operate (ATO) was granted on October 25, 2011, and expires on October 25, 2014.

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

Yes. NARA approved the retention schedule on June 27, 2008. QARS records are retained pursuant to NARA Authority N1-311-08-1, item 1 and item 2.

### **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# 1660-0036, "Federal Emergency Management Agency (FEMA) Individual Assistance Customer Satisfaction Surveys" (Expires 7/31/2014);
- OMB# 1660-0128, "Federal Emergency Management Agency Individual Assistance Program Effectiveness & Recovery Survey" (Expires 8/31/2014);
- OMB# 1660-0129, "Federal Emergency Management Agency Individual Assistance Follow-Up Program Effectiveness & Recovery" (Expires 8/31/2014);

<sup>13</sup> DHS/FEMA-008 - Disaster Recovery Assistance Files, 78 FR 25282 (April 30, 2013), available at <https://www.federalregister.gov/articles/2013/04/30/2013-10173/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-008-disaster>.

<sup>14</sup> DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan System of Records, 79 FR 16015 (March 24, 2014), available at <https://www.federalregister.gov/articles/2014/03/24/2014-06361/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-009-hazard>.

<sup>15</sup> DHS/FEMA-002 Quality Assurance Recording System, 79 FR 35366 (June 20, 2014), available at <https://www.federalregister.gov/articles/2014/06/20/2014-14079/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-002-quality>.



- OMB# 1660-0107, “Public Assistance Customer Satisfaction Survey” (Expires 8/31/2015); and
- OMB# 1660-0002, “Disaster Assistance Registration” (Expires 7/31/2014).

## Section 2.0 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.

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

FEMA collects, uses, and maintains PII from IA or PA disaster assistance applicants and from FEMA employees or contractors who access the IA IT system (formerly NEMIS-IA<sup>16</sup>) or Customer Satisfaction Analysis System (CSAS) when interacting with disaster assistance applicants by telephone or during case review.<sup>17</sup>

#### From IA Applicants:

- Registration ID
- Individual’s name (available in recording)
- Home address (available in recording)
- Social Security number (available in recording)
- Home phone number (available in recording)
- Current mailing address and phone numbers (available in recording)
- Personal financial information including the disaster applicant’s bank name, bank account information (available in recording)
- Insurance information (available in recording)
- Individual or household income (available in recording)
- The number of occupants and dependents (available in recording)
- Dollar amount of their losses (available in recording)

#### From PA Applicants:

- Registration ID
- Applicant or Point of Contact name and title (available in recording)
- Applicant email address (available in recording)

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<sup>16</sup> DHS/FEMA/PIA-027 National Emergency Management Information System-Individual Assistance (NEMIS-IA) Web-based and Client-based Modules, *available at*,

[http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_fema\\_nemis\\_ia\\_20120629.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_nemis_ia_20120629.pdf).

<sup>17</sup> DHS/FEMA/PIA-035 Customer Satisfaction Analysis System (CSAS), *available at*,

[http://www.dhs.gov/sites/default/files/publications/privacy-pia-fema-csas-february2014\\_0.pdf](http://www.dhs.gov/sites/default/files/publications/privacy-pia-fema-csas-february2014_0.pdf).



- Organization Name (available in recording)
- Organization's business and/or mailing address (available in recording)

FEMA employees or contractors:

- Registration ID
- Employee Name (automatically entered)
- Employee ID (automatically entered)
- Notations (Either as they appear in a screenshot or as they are input into QARS as part of an evaluation)<sup>18</sup>
- Call center performance data (received through data feeds from Call Management System (CMS))<sup>19</sup>

CSAS Generated Data:

- Survey ID (specific identification number generated only by CSAS system and available in recording for customer satisfaction assessments).

In addition, QARS generates information 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.

QARS-Generated data:

- Contact ID (assigned to each recorded contact in QARS as a unique identification)
- Performance and Quality Results Reports
- Desktop and Process Analytics (analyzing desktop software usage)
- A "quality result" generated in QARS (about the FEMA employee or contractor who conducts the phone transaction or case review involving an individual or public disaster assistance applicant's file or request for internal assistance)

QARS receives daily statistical information from the CMS, Enterprise Data Warehouse (EDW)<sup>20</sup> and Document Management and Records Tracking System (DMARTS)<sup>21</sup> to display

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<sup>18</sup> Notations are general notes made by FEMA employees or contractors while interacting with an applicant or performing a quality review. FEMA trains users not to include PII in their notations.

<sup>19</sup> CMS is part of the ACCN Platform. DHS/FEMA/PIA -021 Advanced Call Center Network Platform, *available at*, [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_fema\\_accn.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_accn.pdf).

<sup>20</sup> DHS/FEMA/PIA - 026 Operational Data Store and Enterprise Data Warehouse, *available at*, [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_pia\\_fema\\_ods\\_edw\\_20120629.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_fema_ods_edw_20120629.pdf).

<sup>21</sup> DHS/FEMA/PIA-009(a) Document Management and Records Tracking System (DMARTS), *available at*, [http://www.dhs.gov/sites/default/files/publications/privacy\\_pia\\_fema\\_dmarts\\_20130515.pdf](http://www.dhs.gov/sites/default/files/publications/privacy_pia_fema_dmarts_20130515.pdf).





employee or contractor performance data within the QARS performance reporting tool. The data includes the following:

From CMS:

- FEMA Agent ID
- Date
- Time duration values representing the time FEMA employees or contractors spend performing specific tasks or activities, such as: breaks, lunches, projects, inbound calls, outbound calls, or hold time. This information assists FEMA in maintaining staff schedule levels to ensure the Agency meets its service performance goals.
- Number of calls placed and received
- Number of calls missed
- Agent and call routing queue identifier (e.g., helpline queue, registration intake queue)

From DMARTS:

- FEMA Agent ID
- Action (These are different actions denoted in DMARTS; for example Reprocess, Archive, and Add)
- Date
- Time (hours, minutes, seconds)

EDW (NEMIS Timestamp Report):

- FEMA Agent Name (First & Last)
- Action (e.g., route, cancel, hold)
- Date
- Process (e.g., applicant inquiry, applicant update)
- Time (hours, minutes, seconds)
- FEMA employee or contractor
- User Name

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

There are four sources for the information maintained in QARS: 1) disaster assistance applicants; 2) FEMA employees and contractors providing customer service to disaster assistance applicants, conducting case processing review of an applicant's file, providing support to internal departments, or performing a customer satisfaction assessment; 3) the QARS-



generated quality result about the performance of the FEMA employee or contractor after the FEMA Quality Control Specialist or Supervisor completes the QARS evaluation form; and 4) the other IT systems from which QARS receives data: CSAS, CMS, EDW, and DMARTS.

### **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

No.

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

The call recordings and screen captures in QARS provide a “snap shot” of individual customer service transactions and are not collected or stored in a format that is correctable or retrievable by applicant name. The way information is collected and maintained in QARS has no impact on a disaster assistance applicant’s ability to obtain FEMA assistance. During the review of a recorded transaction, if an evaluator notices an inconsistency of information about an applicant between a recording and screen capture, the evaluator reports the inconsistency to FEMA personnel who are able to update the record in the aforementioned system. Lastly, biennial system audits of user profile information provide an opportunity to correct erroneous data.

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

Information in QARS is collected directly from individuals and is stored in the form of a recording or a screen shot. These methods ensure data quality and accuracy since they cannot be modified. There is no privacy risk to the characterization of information collected and stored within QARS.

## **Section 3.0 Uses of the Information**

The following questions require a clear description of the project’s use of information.

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

FEMA uses the information in QARS for internal quality assurance purposes as follows:

- For employees and contractors in direct contact with disaster applicants: FEMA uses the information to improve the quality of its responses to disaster assistance applicants by assessing the performance of FEMA’s employees and contractors.
- For Contract Oversight Management Section personnel: FEMA uses QARS to assess the performance quality of contractors, such as language translation providers and temporary call center agents.
- For National Coordination Team Assistance Group personnel: FEMA uses QARS to assess the quality of support received by NPSC employees and contractors who serve the disaster assistance applicants.



- For Customer Satisfaction Analysis personnel: QARS is used to monitor and assess the quality of interactions between its employees and contractors and both IA and PA applicants during the survey process and to improve the performance of CSA staff.
- For supervisors: QARS voice recordings assist in coaching, mentoring, counseling, and allows NPSC employees and contractors to better assist disaster assistance applicants.
- For the NPSCs: FEMA uses QARS to identify call trend information to enhance the level of support provided to disaster survivors.

**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.

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

No.

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

**Privacy Risk:** There is a risk that information could be used in a manner inconsistent with the purpose of collection.

**Mitigation:** All information within QARS is collected to evaluate employee and contractor performance. FEMA does not share QARS data. Employees have access to their own recorded calls in QARS.

## Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

FEMA provides notice to individual disaster assistance applicants in several ways. First, FEMA provides notice of the collection through the privacy compliance documentation for QARS, namely the DHS/FEMA-002 Quality Assurance Recording System SORN 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, FEMA employees and contractors who telephone the applicant 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, supervisory and training staff informs employees and contractors that their calls and screenshots will be recorded and monitored for quality assurance and performance.

The language of the privacy notice is consistent with the language heard on the automated message for callers contacting FEMA and includes: *“This call may be monitored and recorded for quality assurance purposes.”* Calls in which 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. FEMA’s DisasterAssistance.gov website includes a Privacy Act Statement that will serve notice to disaster assistance applicants applying on-line that their information may be used for quality assurance purposes. The text of the Privacy Act Statement, call script, and automated message is included as an appendix to this PIA.

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

An automated message from FEMA at the beginning of each IA call to the NPSC informs 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.

For customer service assessment calls made from the NPSC to applicants for FEMA’s Individual and Public Assistance program, applicants may decline to participate in the customer service assessments and therefore opt-out of the recording at the time they are contacted to participate.

Refusing to have a call recorded will not affect a disaster applicant’s ability to obtain disaster assistance; however, disaster assistance applicants who refuse the call recording forfeit the option of using the telephone to apply for disaster assistance, check the status of their disaster assistance applications, or have their customer satisfaction assessed. Disaster assistance applicants who do not consent to call recordings may apply for disaster assistance by completing the online disaster assistance application and check the status of or update their case online at [www.DisasterAssistance.gov](http://www.DisasterAssistance.gov). Information collected through DisasterAssistance.gov is part of the Disaster Recovery Assistance Files system of records,<sup>22</sup> which is accessible via NEMIS-IA, and may therefore be randomly selected by QARS for recording during case review and subsequently included in QARS.

FEMA employees/contractors working in specific positions subject to recording in QARS cannot opt-out of QARS as the recording is a requirement of their position.

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

**Privacy Risk:** There is a privacy risk that individuals may be unaware of the QARS use

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<sup>22</sup> DHS/FEMA-008 Disaster Recovery Assistance Files (April 30, 2013), 78 FR 25282, *available at* <https://www.federalregister.gov/articles/2013/04/30/2013-10173/privacy-act-of-1974-department-of-homeland-security-federal-emergency-management-agency-008-disaster>.



for employee and contractor performance management and evaluation.

**Mitigation:** FEMA manages this risk by providing notice through the DHS/FEMA-002 Quality Assurance Recording System SORN and this PIA. FEMA also provides notice to its employees and contractors upon the initial training for their position and through user system guides and resources. In addition, FEMA provides notice of call monitoring and recording via an automated message when IA disaster assistance applicants call FEMA's NPSCs via the toll-free number and FEMA employees and contractors who call IA and PA applicants 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 DisasterAssistance.gov website includes a Privacy Act Statement that will serve notice to disaster assistance applicants applying on-line that their information may be used for quality assurance purposes.

## **Section 5.0 Data Retention by the project**

The following questions are intended to outline how long the project retains the information after the initial collection.

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

FEMA retains QARS recordings for different lengths depending on the use of the data. Records within QARS that are used in an evaluation of a FEMA employee or contractor is retained, pursuant to NARA Authority N1-311-08-1, item 1 under 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 and contractor performance evaluations or to determine qualifications for continued employment. FEMA will purge recordings that are not used in an evaluation of a FEMA employee or contractor within 45 days, per the NARA Authority N1-311-08-1, item 2 and FEMA Records Schedule "FEMA Series Disaster Assistance Program-15-2."

### **5.2 Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** There is a risk that FEMA maintains QARS data longer than necessary to meet the mission requirements of the quality assurance program.

**Mitigation:** The retention schedules for QARS data have been tailored to allow FEMA to access the data for only as long as necessary to resolve any personnel issues arising from QARS data recordings. The QARS system administrators set an automated schedule for the purging of non-evaluated data and for the archiving of evaluated data, per the approved record schedule. In addition, a QARS system administrator performs a scheduled log audit, which ensures all recordings have been managed according to the defined retention schedule.

## **Section 6.0 Information Sharing**

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government and private sector entities.



## **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.**

No. FEMA does not routinely share the information in QARS outside of DHS as part of normal business processes of the agency. In the rare instance that QARS information is shared outside of DHS, FEMA only shares QARS information pursuant to the routine uses in the DHS/FEMA-002 Quality Assurance Recording System SORN, and only after DHS determines that the receiving component or agency has a need to know the information within the context of its respective duties.

FEMA electronically transmits the information in encrypted, password-protected files via secure electronic transmission.

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

As per 6.1 above, FEMA does not routinely share the information in QARS outside of DHS as part of normal business processes of the agency. Routine uses within the DHS/FEMA-002 Quality Assurance Recording System SORN covers the limited instances in which information in QARS may be shared outside of DHS.

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

Yes. FEMA shares information only if a routine use outlined in the SORN listed under Section 6.2 above permits disclosure and there is a demonstrated “need to know” the information.

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

As identified in the SORN listed under Section 6.2 above, requests for QARS records should be made to the FEMA Disclosure Officer, which maintains the accounting of what records are disclosed and to whom.

## **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** QARS contains information from the DHS/FEMA-008 Disaster Recovery Assistance (DRA) Files SORN and the DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan SORN, which means there is a risk that information from these systems of records could be inappropriately disclosed pursuant to QARS routine uses rather than the routine uses of their respective SORNs.

**Mitigation:** FEMA manages this risk through training. System-specific privacy awareness training is required for all QARS users. Users are trained to ensure that the information in QARS is only shared or disclosed in a manner consistent with the purpose of the collection of the information and consistent with the QARS SORN covering the specific information that is to be shared or disclosed.



**Privacy Risk:** There is a risk of unauthorized use or disclosure of the information.

**Mitigation:** To mitigate the risk of unauthorized use or disclosure to information in QARS, external sharing is limited to requests in writing, pursuant to the Routine Uses in the DHS/FEMA-002 Quality Assurance Recording System SORN, and only for the minimum amount of data required to achieve a documented business purpose.

## Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

DHS employees and contractors may seek access to their information by submitting a Privacy Act or Freedom of Information Act (FOIA) request to the Disclosure Officer, DHS/FEMA, Records Management Division, 500 C Street, SW, Washington, DC 20472. Data in QARS is not retrieved or retrievable by any unique identifier of the disaster assistance applicant; therefore, Individual and Public Assistance disaster applicants are not able to access any information about them that is contained within the recordings included in QARS.

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

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

Employees may correct inaccurate evaluations or conclusions about themselves that are based on the recordings in QARS. Procedures are addressed, outlined, and described in the DHS/FEMA-002 Quality Assurance Recording System SORN.

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

All notification, record access and record correction procedures for QARS are addressed, outlined, and described the DHS/FEMA-002 Quality Assurance Recording System SORN.

As for IA and PA applicants, as noted in section 7.2, the notification, record access and record correction procedures are outlined in the SORN covering the respective program.

In addition to aforementioned procedures in 7.2, and 7.3, DHS/FEMA employees and contractors may request copies of their recordings. 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.



## 7.4 Privacy Impact Analysis: Related to Redress

**Privacy Risk:** There is a risk that the FEMA employees and contractors do not have adequate redress opportunities to correct, amend, or access their information in QARS.

**Mitigation:** FEMA employees and contractors whose information may be captured in QARS are informed of the appropriate redress mechanisms through the required QARS user training. For example an employee would notify his or her supervisor if he or she found that QARS contained any erroneous PII about him or her. In addition, the DHS/FEMA-002 Quality Assurance Recording System SORN and this PIA describe these procedures.

## Section 8.0 Auditing and Accountability

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

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

The Office of Response and Recovery ensures the practices stated in this PIA by leveraging standard operating procedures (SOP), orientation and training, policies, rules of behavior, and biennial user account auditing. In addition, QARS requires specific technical safeguards to prevent misuse of voice recording or screen capture data. 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.

A complete security and access control system is in place for users who process and administer the data in the system. These controls comply with DHS Security QARS-specific guidelines, which includes the automatic revocation of access upon expiration of privileges and role-based access controls that prevent browsing.

FEMA Enterprise Operations and the FEMA Office of Cyber Security monitor system use and determine whether information integrity has been compromised and whether corrective action by the Office of the CIO is necessary. If there is a possible breach, 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, also known as the Federal Information Security Management Act of 2002.<sup>23</sup>

Unauthorized attempts to upload information or change information are prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986<sup>24</sup> and subsequent amendments by the National Information Infrastructure Protection Act of 1996.<sup>25</sup> FEMA employs software programs that monitor host and network traffic to identify unauthorized attempts to upload or change information or otherwise cause damage.

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<sup>23</sup> 44 U.S.C. § 3541.

<sup>24</sup> 18 U.S.C. § 1030.

<sup>25</sup> See *id.*





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

All privacy awareness training follows current systems user requirements and is subject to FEMA training guidelines. Authorized users of the system are also 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, a QARS system administrator will maintain the log of all users who are issued rights. This information is stored in a password-protected location on the network.

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

QARS has written security policies that define all user rights and roles. A QARS System Administrator has 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, FEMA does not issue user access identifications and passwords. Upon completion of all required Privacy awareness training, the User Manager maintains a 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: QARS system administrators, who have full rights to assign other users and hear and see all data within the system; quality control personnel, who have the role to listen and see all recording data for the purpose of evaluating employee and contractor phone personnel; and operations supervisory and management staff, who have specific roles to access the data of employee and contractors assigned directly to their individual teams.

The system contractor who installs the technology has 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 is available while providing system hardware and software support. Contractors are required to comply with Homeland Security Presidential Directive (HSPD-12) prior to accessing any DHS system.

Contractors hired by FEMA to conduct inbound and 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 are not assigned login access rights into the call recording system but are supplied the results from quality evaluations through the FEMA Contracting Office Representative.



## **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?**

QARS does not currently require information sharing agreements or MOUs; however, the project has a process to review such agreements if it becomes necessary. This process involves review by the FEMA IT Security Branch, FEMA Privacy Officer, and Office of Chief Counsel prior to sending to the DHS Privacy Office for formal review and clearance. Similarly, QARS will leverage its stakeholders in the process of reviewing and approving any new uses for the project.

## **Responsible Officials**

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

## **Approval Signature**

Original signed and on file with the DHS Privacy Office.

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Karen L. Neuman  
Chief Privacy Officer  
Department of Homeland Security



## **Appendix A: NPSC Privacy Act Statement Provided to Disaster Survivors**

### **Telephone Script Privacy Statement:**

*“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.”*



## **Appendix B: NPSC Privacy Act Statement Provided to Disaster Survivors**

FEMA is required by law to provide you with a copy of the 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 within FEMA for quality assurance purposes and used to assess FEMA’s customer service to disaster assistance applicants.

**ROUTINE USE(S):**The information on this form may be shared outside of FEMA as generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended. This includes sharing this information with State, tribe, local, and voluntary organizations to enable you to receive additional disaster assistance and as necessary and authorized by other routine uses published in DHS/FEMA-008 Disaster Recovery Assistance Files System of Records, 78 Fed. Reg. 25,282 (April 30, 2013), 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.”