

September 23, 2022

Federal Emergency Management Agency  
FOIA Officer  
Disclosure Branch  
500 C Street, S.W., Mail Stop 3172  
Washington, D.C. 20472-3172

Dear Records Custodian,

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552 et seq., I request copies of the following records:

**1) All non-PII database records in the Housing Operations Management Enterprise System (HOMES)**

As you are aware, the Federal Emergency Management Agency (FEMA) tracks its direct housing operations through its Housing Operations Management Enterprise System (HOMES), which the FEMA Direct Housing Guide calls “the Direct Housing system of record.”<sup>1</sup>

HOMES is a module of FEMA’s National Emergency Management Information System - Individual Assistance (NEMIS-IA), an IT system capable of interoperating with the agency’s Enterprise Data Warehouse/Operational Data Store.<sup>2</sup>

I request all database records stored within the Housing Operations Management Enterprise System (HOMES) module, with the exception of data fields that contain personally-identifiable information, such as names and phone numbers. You may also withhold data fields that contain sensitive user information, such as HOMES and/or NEMIS usernames and passwords, server configurations, and server logs.

It is my informed belief that NEMIS, NEMIS-IT, and HOMES database records are stored in a relational SQL database.<sup>3</sup> As such, it should be possible to withhold a particular set of data fields (or columns) without the need to individually review or redact such fields, and without the need to withhold any other portion of the records. This approach is supported by 5 U.S.C. § 552(a)(8)(A)(ii),

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<sup>1</sup> Federal Emergency Management Agency, “FEMA Direct Housing Guide, February 2020.” [https://www.fema.gov/sites/default/files/2020-07/Direct\\_Housing\\_Guide\\_Feb2020.pdf](https://www.fema.gov/sites/default/files/2020-07/Direct_Housing_Guide_Feb2020.pdf).

<sup>2</sup> Federal Emergency Management Agency / Department of Homeland Security, “Privacy Impact Assessment for the Individual Assistance (IA) Program,” pp. 5, 50. <https://www.dhs.gov/sites/default/files/publications/privacy-pia-fema-049-ia-january2018.pdf>.

<sup>3</sup> FEMA Information Technology Services Directorate, Operations Division, “NEMIS Concept of Operations,” <https://www.fema.gov/pdf/library/conops.pdf>.

which states that an agency shall “take reasonable steps necessary to segregate and release nonexempt information[.]”

Given that this request pertains to a comprehensive export of a specific database system, rather than a document search, I do not believe it is necessary to specify a time period for the records. If, however, specifying such a time period *is* necessary for your process, please use the following: January 1, 2000, to the date the records export is performed.

I request these records in their native digital format — e.g., as an SQL database files — and not in formats that degrade the accessibility of the records, such as PDF or Word. If converting the native digital format to another high-fidelity format, such as CSV or Excel, please take care not to introduce formatting inconsistencies or errors, which can occur in the conversion process (for example, encoding errors or the inclusion of internal unescaped quotation marks in CSV files).

I recognize that I am requesting a large amount of data. For this reason, I would be happy to provide an online file transfer folder (e.g., Dropbox, Google Drive, etc.), an external hard drive, or USB storage device for the transfer of these files.

## **2) All relevant database documentation**

Additionally, I request all documentation associated with the database records above, so that the public can accurately interpret the data. These documentation records should include (but not necessarily be limited to) all relevant record layouts, database schemas, entity relationship diagrams, database diagrams, data dictionaries, glossaries, and user guides. To clarify:

- A “record layout” (also known as a “database schema”) is a technical document that describes the structure of a database. Here is a publicly-available example from the Centers for Medicare and Medicaid Services:  
[https://www.cms.gov/Medicare/Prescription-Drug-Coverage/DrugCoverageClaimsData/Downloads/FileFormat\\_020806.pdf](https://www.cms.gov/Medicare/Prescription-Drug-Coverage/DrugCoverageClaimsData/Downloads/FileFormat_020806.pdf)
- An “entity relationship diagram” (also known as a “database diagram”) is a technical document that describes the relationships between a database’s various tables and columns. Here is a publicly-available example from the Department of Justice:  
[https://www.justice.gov/sites/default/files/usao/pages/attachments/2014/12/08/erd\\_clions11\\_05\\_08\\_2009.pdf](https://www.justice.gov/sites/default/files/usao/pages/attachments/2014/12/08/erd_clions11_05_08_2009.pdf)
- A “data dictionary” is a document that defines the meaning of each field (and possible values, where necessary) in a database. Here is a publicly-available example from the Bureau of Labor Statistics: <https://www.bls.gov/tus/atuscpscocodebk15.pdf>

- A “glossary” is a document that defines various terms used in the database and associated documentation. Here is a publicly-available example from the Department of Transportation: <https://www.transit.dot.gov/ntd/national-transit-database-ntd-glossary>
- A “user guide” is a document that instructs users of a database or computer system how to interact with it. Here is a publicly-available example from the National Institutes of Health: [https://www.era.nih.gov/files/AMS\\_user\\_guide.pdf](https://www.era.nih.gov/files/AMS_user_guide.pdf)

Your agency may use different terminology for similar kinds of documents. Please consider any such documentation within the scope of this request.

I request all such records produced or in use between January 1, 2000, and the date that the search for such records is conducted.

### **Production of Responsive Records on a Rolling Basis**

In the event that a portion of the present request is completed before the full request is completed, I ask that the records be produced on a rolling basis.

### **Fee Waiver Request**

A waiver of search and review fees is appropriate here because disclosure of the requested information is in the public interest under 5 U.S.C. § 552(a)(4)(A)(iii) and 45 C.F.R. § 5.54(a), (b)(1)-(2), and because the request is not primarily in my commercial interest, 45 C.F.R. §§ 5.45(a), (b)(3)(ii).

#### *Disclosure Is in the Public Interest*

The disclosure of these records is firmly in the public interest. HOMES contains information — such as site selection, housing installation progress, move-in and move-out dates — that could shed invaluable light on a core component of FEMA’s response to major disasters, a component that has come under recent scrutiny.<sup>45</sup> To my knowledge, however, vanishingly little data from the HOMES is available to the public.

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<sup>4</sup> Flavelle, Christopher. “How the Government Is Failing Americans Uprooted by Calamity,” *The New York Times*, July 23, 2022. <https://www.nytimes.com/2022/07/23/climate/climate-disaster-relief-fema.html>.

<sup>5</sup> Dreier, Hannah. “The last days inside Trailer 83,” *The Washington Post*, October 17, 2021. <https://www.washingtonpost.com/nation/2021/10/17/disaster-survivors-fema-housing-trailer/>.

The disclosure of these records could also clarify how well the system itself is working, another issue of potential concern. As a 2020 report by the Government Accountability Office noted:

[...] program officials said this system—which is FEMA’s system of record for tracking direct temporary housing assistance—lacks controls; is inconsistently used by field staff; and has incomplete information, contributing to information-sharing challenges.<sup>6</sup>

### *This Request is Not Primarily in My Commercial Interest*

The requested information is *not* being sought for commercial purposes. 45 C.F.R. § 5.54(a). I am a news media requester that can and will “effectively convey information to the public.” 45 C.F.R. § 5.54(b)(2)(ii). I am doing so on behalf of the Data Liberation Project, a new initiative to bring more datasets of public value into the public domain, especially for journalistic purposes.<sup>7</sup> My “past publication record[,]” 5 U.S.C. § 552(a)(4)(A)(ii), includes serv[ing] from 2014 to early 2022 as the data editor for BuzzFeed News, where I helped to make many datasets available to the public;<sup>8</sup> before that, I worked as a reporter and computer programmer at The Wall Street Journal, where I was named a Pulitzer Prize co-finalist for National Reporting.<sup>9</sup>

Because I have demonstrated that the information will shed light on the operations or activities of the government in relation to FEMA’s direct housing assistance operations, 45 C.F.R. § 5.54(b)(1), and this information is not already in the public domain, 45 C.F.R. § 5.54(b)(2)(i), this request is “not primarily in the commercial interest of the requester.” 45 C.F.R. § 5.54(b)(3)(ii).

As such, and because disclosure “is likely to contribute significantly to public understanding of the operations or activities of the government” (5 U.S.C. § 552(a)(4)(A)(iii)), I request that you waive all applicable fees.

For these reasons, a public interest waiver of fees is appropriate here. I therefore respectfully request that fees related to the search, review, and duplication of requested records be waived.

### **Limitation of Fees**

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<sup>6</sup> Government Accountability Office, “GAO-20-503: Additional Actions Needed to Strengthen FEMA’s Individuals and Households Program.” <https://www.gao.gov/assets/gao-20-503.pdf>

<sup>7</sup> The Data Liberation Project. <https://www.data-liberation-project.org/>.

<sup>8</sup> BuzzFeed News, “An index of all our open-source data, analysis, libraries, tools, and guides.” <https://github.com/BuzzFeedNews/everything>.

<sup>9</sup> The Pulitzer Prizes, “Finalist: John Emshwiller and Jeremy Singer-Vine of The Wall Street Journal.” <https://www.pulitzer.org/finalists/john-emshwiller-and-jeremy-singer-vine>.

I am also entitled to a limitation of fees because I am a member of the news media. 45 C.F.R. § 5.53(b); 5 U.S.C. § 552(a)(4)(A)(ii)(II). Accordingly, even if my application for a waiver of all fees is denied, I am entitled to a limitation of fees. As a news media requester, I am “entitled to search time, review time, and up to 100 pages of duplication” and can be charged only duplication fees after the first 100 pages or its cost equivalent. 45 C.F.R. § 5.53(b). I request that the information be provided in its native electronic format, and thus there should be no duplication fees.

### **Request for Explanation of Withholdings and Redactions**

If this request is denied in whole or in part, please provide a reasonable description of any withheld materials and a justification for all such withholdings that includes reference to the specific FOIA exemptions authorizing withholding and specific reasons why such exemptions apply. 45 C.F.R. § 5.31. An agency shall withhold information only if “the agency reasonably foresees that disclosure would harm an interested protected by an exemption” or “disclosure is prohibited by law.” 5 U.S.C. § 552(a)(8)(A)(i). (Per Attorney General Garland’s March 15, 2022 memorandum, “In case of doubt [regarding foreseeable harm or legal bar to disclosure], openness should prevail.”<sup>10</sup>) I therefore request that if the agency determines that an exemption applies, specific reasons be provided as to why disclosure would harm any interest protected by such exemption. An agency shall also “consider whether partial disclosure of information is possible whenever the agency determines that a full disclosure of a requested record is not possible” and “take reasonable steps necessary to segregate and release nonexempt information.” *Id.* at § 552(a)(8)(A)(ii). I therefore request that the agency release all segregable portions of otherwise exempt material.

I look forward to your reply within the FOIA-specified timeframe of 20 working days. Please let me know if there are any clarifications I can make to make this request easier and/or quicker to complete.

Sincerely,  
Jeremy Singer-Vine  
The Data Liberation Project  
Email: [jvine@gmail.com](mailto:jvine@gmail.com)  
Phone: Available upon request  
Mailing address: Available upon request

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<sup>10</sup> Merrick Garland, "Memorandum for Heads of Executive Departments and Agencies" (Subject: "Freedom of Information Act Guidelines"), March 15, 2022. <https://www.justice.gov/ag/page/file/1483516/download>.