



**Privacy Impact Assessment  
of the  
Official Response Collaboration Application**

**Program or application name:**

Official Response Collaboration Application (ORCA)

**System Owner:**

Board of Governors of the Federal Reserve System (“Board”), Board Members

**Contact information:**

System Manager: Jewell Estes  
Title: Manager, Technology Systems & Services  
Division: Board Members  
Address: 20th Street and Constitution Avenue, N.W.  
Washington, DC 20551  
Telephone: (202) 452-3311

IT System Manager: Meredith Walton  
Title: Manager, Board Systems  
Division: Division of Information Technology  
Address: 20th Street and Constitution Avenue, N.W.  
Washington, DC 20551  
Telephone: (202) 452-3785

## **Description of the program:**

ORCA is a tool that allows Board staff (employees and contractors) to track the workflow associated with the Board's official response to the following categories of correspondence:

- correspondence to the Board from members of Congress or their staff;
- correspondence to members of Congress from congressional constituents or members of the public which are forwarded to the Board by members of Congress; and
- correspondence to the Board from members of the public

(hereinafter collectively referred to as "correspondence"). All correspondence is categorized in ORCA by the Board division or section within a Board division that is responsible for the Board's official response to the correspondence. When the Board receives correspondence, a new ticket is created in the relevant Board division's or section's dedicated module within ORCA. Each ticket includes pertinent metadata relating to the correspondence and a digital copy of the correspondence. Division or section administrators assign Board subject matter experts to prepare responses and to track open tickets within their respective modules until they are closed. In addition to serving as a workflow management tool and repository for correspondence, ORCA is also used to track and store the Board's responses to routine reporting requirements from Congress such as the Board's annual report to Congress.

Federal Reserve System employees and contractors (Bank Staff) have limited access to a specific program to review incoming correspondence and respond to coordinate activities related to the program.

### **1. Information concerning individuals that is being collected and/or maintained:**

ORCA may contain the following information regarding individual correspondents:

- a. name;
- b. job title/profession;
- c. division/organization;
- d. address (business or home);
- e. telephone number (business, home or cell);

- f. alternate phone number;
- g. facsimile number (business or home); and
- h. e-mail address (business or personal).<sup>1</sup>

Additionally, the correspondence and the Board's responses to the correspondence may contain other personal information regarding individual correspondents such as information relating to personal financial matters, social security numbers, and bank account numbers.

**2. Source(s) of each category of information from item 1:**

Information concerning individuals contained in ORCA is derived from or related to correspondence from congressional member(s) or their staff, congressional constituents, and members of the public.

**3. Purposes for which the information is being collected:**

While the Board does not solicit the information concerning individuals that is contained in ORCA, the information may be provided to the Board in correspondence by Congress and their staff, congressional constituents, and members of the public. The Board maintains the correspondence—including any information concerning individuals derived from or related to the correspondence—for the purposes of managing the workflow associated with timely responding to correspondence and maintaining a searchable repository of open and closed tickets.

**4. Individuals who will have access to this information:**

Access to ORCA is restricted to authorized Board and Bank staff who require access for official business purposes on a need-to-know basis. In addition, information in the system may be disclosed for the purposes set forth in the System of Records Notice entitled BGFRS-11 "FRB—Official General Files."

**5. Whether the individuals to which the information pertains will have an opportunity to decline to provide the information or consent to particular uses of the information (other than required or authorized uses):**

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<sup>1</sup> Division and section administrators are required to enter for each ticket in ORCA at least one of the following fields: name, title/profession, or division/organization.

Individuals may decline to provide information by limiting the personal information they provide or by not submitting correspondence to the Board. The Board does not solicit or control the submission of information from members of Congress or their staff on behalf of constituents or members of the public.

**6. Procedures(s) for ensuring that the information maintained is accurate, complete, and up-to-date:**

Board staff upload incoming correspondence to ORCA as it is received from individuals. The Board does not change the information received or verify the accuracy of the information submitted.

**7. The length of time the identifiable information will be retained and how it will be purged:**

ORCA maintains completed tickets (a record for which a response has been provided or for which no response is deemed necessary) indefinitely as needed for official business purposes. Outside of ORCA, completed tickets are maintained indefinitely in the Board's official electronic recordkeeping system.

**8. The administrative and technological procedures used to secure the information against unauthorized access:**

ORCA has the ability to track individual user actions within the system. The audit and accountability controls are based on NIST and Board standards, which in turn are based on applicable laws and regulations. The controls assist in detecting security violations or other issues in ORCA.

Access to ORCA is restricted to authorized Board and Bank staff who require access for official business purposes. Users are classified into different roles and common access and usage rights are established for each role. User roles are used to delineate between the different types of access requirements such that users are restricted to data that is required in the performance of their duties. Periodic audits and reviews are conducted to determine whether users still require access and have the appropriate role.

