



Privacy Impact Assessment of the Enterprise Governance and Logistics System

Program or application name:

Enterprise Governance and Logistics System

System Owner:

Board of Governors of the Federal Reserve System's (Board) Office of the Secretary (OSEC)

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Description of the program or application:

The Enterprise Governance and Logistics System (EGLS) is a series of information technology components that the Board uses to distribute information for voting and reference purposes. While EGLS is neither intended to nor designed to collect personally identifiable information (PII), in some instances the system components (identified below) may, for certain items such as a Board vote on a banking application, include PII.

EGLS components that may contain PII are the following:

- Board Meetings – OSEC staff use Board Meetings to distribute Board meeting agendas and meeting-related documents to Board members and select Board staff on a need-to-know basis. These staff include staff in the initiating division who are involved in preparing and presenting a meeting item, staff on the general distribution list approved by OSEC, and other Board staff identified by the initiating division.
- Board and Delegated Actions (BDA) – OSEC staff use BDA to process, distribute and track decisions made by Board members, when an action will be determined without a Board meeting, and by delegees which have been granted authority by Board members to approve certain types of actions. Staff use BDA to record the decisions of Board members and their delegees.
- For Your Information (FYI) – OSEC staff use FYI to securely send information that does not require action to Board members and select Board and Federal Reserve System (FRS) staff on a need-to-know basis.
- Minutes and Actions System (Minutes) – OSEC staff use Minutes to process the record of discussion, vote, and disposition of matters considered at each Board meeting and to record actions taken by the Board, by Board staff, or by FRS staff under delegated authority. Actions delegated to the FRS are primarily related to banking applications.

1. The information concerning individuals that is being collected and/or maintained:

Although EGLS is not designed to capture PII and PII is not collected purposely, individual information may be contained within the system because some action items may include PII. Examples of PII within the system may include, but are not limited to, an individual's name, address, telephone number, date of birth, place of birth, citizenship, and occupation, as well as information about companies the individual is affiliated with or other biographical information.

2. The source(s) of each category of information listed in item 1:

To the extent that PII may be contained in information transmitted in one of the EGLS components, it may either be from individuals submitting information to the Board or the Federal Reserve Banks acting under delegated authority or it may be collected from other sources, *e.g.*, Board-supervised financial institutions.

3. The purpose for which the information is being collected:

The purpose of EGLS is to distribute information for voting and reference purposes. To the extent that PII is present among the matters distributed using the system, such information relates to the Board's exercise of its legal authorities pursuant to, but not limited to, the Dodd-Frank Act; the Federal Reserve Act, 12 U.S.C. §§ 221 *et seq.*; the Home Owners' Loan Act, 12 U.S.C. §§ 1461; the Change in Bank Control Act, 12 U.S.C. § 1817(j); the Bank Merger Act, 12 U.S.C. § 1828(c); the Federal Deposit Insurance Act, 12 U.S.C. §§ 1811 *et seq.*; the Bank Holding

Company Act of 1956, 12 U.S.C. §§ 1841 *et seq.*; the Bank Service Company Act, 12 U.S.C. §§ 1861 *et seq.*; the International Banking Act, 12 U.S.C. §§ 3101 *et seq.*; the consumer protection laws regarding practices by banks and other financial institutions supervised and regulated by the Board; and the Board's Regulations, 12 C.F.R. §§ 201 *et seq.*

4. With whom the information will be shared:

Access to data is limited to only Board and FRS employees with a need-to-know the information for official business purposes.

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

As EGLS is not intended to collect PII, individuals to whom the PII pertains will generally not have an opportunity to decline to provide the information or to consent to particular uses of the information before it is distributed in EGLS. However, in the case of information derived from regulatory applications, notices, and proposals filed by the individual to whom the information pertains, the individual has the opportunity to decline to file the relevant application, notice, or proposal.

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

The accuracy, completeness, and timeliness of any PII is reliant upon the financial institution (or its agent) or the individual who initially provides information to Board and FRS staff prior to its distribution in EGLS. Board staff assigned to a particular regulatory matter under consideration will review data for sufficiency and completeness upon the receipt of the information or its initial entry into EGLS.

7. The length of time the data will be retained and how the data will be purged:

- Board Meetings – The Board preserves documents in Board Meetings as part of the Board package in the Board's electronic records management system. The Board package consists of the documentation presented to the Board for consideration or vote. The documents may include, but are not limited to, agendas, discount rate memoranda, proposed and final orders, staff recommendations (action memoranda), correspondence, congressional reports and testimony, enforcement orders, and Board policies. Board packages are permanent records that are retained in the Board's electronic records management system indefinitely and transferred by the Board to National Archives and Records Administration (NARA) pursuant to the applicable records schedule. The Board retains a copy of the documents in EGLS until no longer needed for administrative or reference purposes.

- Board and Delegated Actions (BDA) – Documents from BDA related to Board actions are preserved as part of the permanent Board package in the Board’s electronic records management system. BDA documents approved under delegated authority are related to delegated actions for a variety of banking application, Reserve Bank administrative, regulatory, and supervisory matters that are retained in the Board’s electronic records management system for a minimum of 15 years to permanent, depending upon the matter. The Board transfers the records to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in EGLS until no longer needed for administrative or reference purposes.
- For Your Information (FYI) – Documents from FYI not related to Board meetings or banking applications are currently unscheduled and therefore are retained by the Board indefinitely in the Board’s electronic records management system. Documents from FYI related to Board meetings are preserved as part of the permanent Board package in the Board’s electronic recordkeeping system. The Board transfers the records to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in EGLS until no longer needed for administrative or reference purposes.
- Minutes and Actions System (Minutes) – Documents from Minutes, which consist of minutes of Board meetings, agendas, and records of Board actions, are permanent records and are kept in the Board’s electronic records management system. The Board transfers the documents from the Minutes to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in EGLS until no longer needed for administrative or reference purposes.

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

Data security is provided using a layered approach that restricts access to designated authorized users in combination with robust technical controls. The Board restricts access to data in EGLS to only authorized Board and FRS employees who have a need for the information for official business purposes. The Board classifies EGLS users into different roles, and common access and usage rights are established for each role. The Board establishes user roles to delineate between the different types of access requirements and EGLS relies on common security access controls.

To maintain the integrity and reliability of the data maintained in EGLS, user access is protected by applicable information security settings. Data is encrypted at rest and in transit for additional security. To maintain the reliability of EGLS, the Board has implemented contingency processes and resources to permit the timely restoration of EGLS.

