



**Privacy Impact Assessment  
of  
Document Management System  
for the Board of Governors of the Federal Reserve System's  
Division of Banking Supervision and Regulation and Division  
of Consumer and Community Affairs**

**Program or application name:**

Document Management System for the Division of Banking Supervision and Regulation and the Division of Consumer and Community Affairs (DMS)

**System Owner:**

Board of Governors of the Federal Reserve System's (Board) Division of Banking Supervision and Regulation and Division of Consumer and Community Affairs.

**Contact information:**

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## **Description of the IT system:**

The DMS consists of multiple local applications (or computer programs) maintained by the Federal Reserve System to track and to store electronic documents and/or images of paper documents. (Appendix A contains a list of these applications.) The DMS supports business processes through the creation, storage, organization, transmission, retrieval, manipulation, update, and eventual disposition of documents to fulfill the mission and responsibilities of the supervision function. DMS includes search engines capable of indexing a wide variety of repositories and data types such as web sites, relational databases, notes databases, document management systems, and fileshares. Once the data are indexed, DMS is searchable through simple or advanced search interfaces. The Division of Banking Supervision and Regulation (BS&R) of the Federal Reserve System operates the DMS system on behalf of BS&R and the Division of Consumer and Community Affairs (DCCA.)

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

The DMS is not designed to capture personally identifiable information. Certain financial institution records, however, that are requested, received, reviewed and stored as part of the supervision process may include personally identifiable information, and may include:

- a. customer name;
- b. loan customer name;
- c. home address;
- d. social security number;
- e. taxpayer identification number;
- f. driver's license number;
- g. birth date;
- h. place of birth;
- i. account numbers;
- j. loan account number;
- k. loan or account officer name;
- l. loan officer number;
- m. loan balances, interest rates and payment information;
- n. non-public confidential bank loan classifications;
- o. financial transaction data;

- p. non-public Bank Secrecy Act/Anti-Money Laundering and Office of Foreign Asset Control documentation;
- q. non-public Suspicious Activity Reports; and
- r. subpoenas and related legal documentation.

## **2. Source(s) of each category of information listed in item 1.**

The information maintained in the DMS is provided by supervised financial institutions, federal and state banking regulatory agencies and international banking regulatory entities that are involved in the supervisory process.

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

The Federal Reserve uses the information maintained in the DMS to evaluate financial institutions' safety and soundness and compliance with consumer and community affairs laws and regulations. Personally identifiable information obtained during the supervisory process is generally not specifically referenced by examiners, but may be used to support analyses and findings. For example, individual data may be used to support aggregate analysis of issues raised during the supervision process.

## **4. Who will have access to the information.**

The information maintained in the DMS is designated as confidential supervisory information and access to the information is generally limited to authorized Federal Reserve employees and contractors who have a need for the information for official purposes. The information may also be shared as needed for conducting joint supervisory initiatives with the Federal Financial Institutions Examination Council staff of other banking regulatory agencies, including the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, state banking regulators, and foreign banking regulators consistent with the Board's regulations as well as explicit information sharing agreements that require the implementation of access restrictions and security safeguards. In addition, the information may be disclosed where a suspected or confirmed compromise of security or confidentiality exists and to prevent, minimize, or remedy such harm that may occur.

**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.)**

Individuals do not have an opportunity to decline to provide the information or consent to particular uses of the information maintained in DMS. The information is not collected from the individual, but directly from the financial institution during the supervisory process pursuant to the institution's statutory obligation to provide any and all financial records to its federal regulator. The information is acquired by the financial institution from its customers as a routine business activity.

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

All personally identifiable information collected as part of examination documentation and stored in DMS is obtained directly from financial institutions during the supervisory process. The examiner-in-charge or his/her designee is responsible for ensuring to the extent possible the accuracy and completeness of the information acquired from the financial institution.

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

The DMS serves as a repository for examination and inspection documents. Examination workpapers, including those stored in the DMS, are typically maintained for five years; however, in the event of a supervisory or enforcement action initiated by the Board of Governors, information may be maintained for three years after termination of such supervisory or enforcement action. In some cases, aggregate or summary data may be held for longer periods to support business cycle analysis. Paper documents are destroyed by shredding and electronic documents are purged from the appropriate databases after the retention period expires.

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

The Federal Reserve System uses a combination of methods to secure the information contained in DMS. For example, DMS databases are: (1) maintained in the Federal Reserve System’s restricted-access facilities, (2) stored on access-controlled servers, and (3) encrypted if they are downloaded to an examiner’s laptop, or mobile storage device. Information security configurations for DMS are regularly reviewed to ensure ongoing compliance with the requirements defined in the Board’s Information Security Program. In addition, under information sharing agreements with other banking regulatory agencies, any data that is shared with these agencies must use encrypted devices to ensure safe handling of sensitive PII data.

**9. Whether a new system of records under the Privacy Act will be created. (If the data are retrieved by name, unique number or other identifier assigned to an individual, then a Privacy Act system of records may be created.)**

No new system of records is required because the personally identifiable information maintained in DMS is not retrieved by reference to an individual’s name or other personal identifier.

**Reviewed:**

Charles S. Struckmeyer */signed/*

09/14/2010

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Chief Privacy Officer

\_\_\_\_\_  
Date

Maureen Hannan */signed/*

09/15/2010

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Chief Information Officer

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Date

## Appendix

The Federal Reserve System currently deploys the following DMS systems:

- Domino.doc maintained by the Federal Reserve Bank Boston, Federal Reserve Bank Chicago, Federal Reserve Bank Dallas, Federal Reserve Bank Philadelphia, and the Federal Reserve Board;
- Open Text DMS maintained by the Federal Reserve Bank Minneapolis, Federal Reserve Bank Atlanta, Federal Reserve Bank Kansas City, Federal Reserve Bank San Francisco, and Federal Reserve Bank St Louis;
- Central Document & Text Repository (CDTR) maintained by the Federal Reserve Board;
- Integrated Imaging Document Management System utilizing Input Accel as a pass-through Imaging System maintained by the Federal Reserve Bank New York; and
- Autonomy document indexing system maintained by the Federal Reserve Bank New York.
- Enterprise Search Infrastructure maintained by the Federal Reserve Bank of New York.