



Privacy Impact Assessment of Community Advisory Council Systems (CAC Systems)

For Questions or Comments, please email: privacy.comments@frb.gov

Description of the IT system:

The Board of Governors of the Federal Reserve System (Board) created the Community Advisory Council (CAC) as an advisory committee to the Board on issues affecting consumers and communities. The CAC is composed of a diverse group of experts and representatives of consumer and community development organizations and interests, including representatives from such fields as affordable housing, community and economic development, small business, and asset and wealth building. CAC members meet semiannually with the members of the Board in Washington, D.C. to provide a range of perspectives on the economic circumstances and financial services needs of consumers and communities, with a particular focus on the concerns of low-and moderate-income consumers and communities.

In its operation and management of the CAC, the Board relies on a variety of information technology systems and applications that collect and maintain information about individuals seeking membership on the CAC (candidates) and CAC member changes (e.g., retired, changed positions during their term).

CAC Systems are comprised of the following components:

- (1) A web interface that allows CAC candidates to submit their application, resume, cover letter and other information.
- (2) A dedicated email account that collects application forms, resumes, and cover letters submitted by CAC candidates, as well as any other data the CAC candidate chooses to provide, and allows Board staff to answer questions submitted by CAC candidates.
- (3) An internal collaboration site that contains information relating to the selection of candidates to the CAC (including information submitted through the website, the email account, and through postal mail) as well as documents prepared by Board staff.
- (4) A separate internal collaboration site that contains information relating to the CAC members.
- (5) Shared network folders that contain information relating to CAC candidates and CAC members.

This PIA updates and replaces the CAC PIA dated March 25, 2022.

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

CAC Systems contain the following information about candidates and members of the CAC (hereinafter also collectively referred to as “individual(s)”):

An individual’s application collects their name and contact information (address, telephone number, and email address), organization and title, organization type and expertise, as well as two attestations affirming that:

- there is no candidate relationship to an employee of the Board of Governors, Federal Reserve Bank, or a Board or Federal Reserve Bank advisory council; and
- no officer or senior executive of the candidate's current organization has a relationship to an employee of the Board, Federal Reserve Bank, or a Board or Federal Reserve Bank advisory council.

If there is a relationship, the candidate shall provide the name of the employee, director, advisory council member, officer, or senior executive with the relationship to the individual, nature of the relationship, and whether the employee, director, advisory council member, officer, or senior executive is or was associated with the Board or a Federal Reserve Bank, and if at a Federal Reserve Bank, indicate which Bank (e.g., New York, St Louis, Minneapolis).

CAC also stores resumes and cover letters from candidates describing their qualifications, and any other information an individual submits, as well as publicly available information on candidates independently obtained by Board staff.

Once selected, as necessary, the Board may also collect information that facilitates the member’s service on the CAC or the work of the CAC (e.g., information for arranging or reimbursing travel, financial information to pay honoraria, headshots, mailing addresses, and staff assistant contact information).

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

Generally, the Board primarily receives information directly from the candidates. However, once an individual becomes a CAC member they may submit contact information for their staff assistants on their behalf, and likewise, staff assistants may submit information on behalf of a CAC candidate or member. Board staff may also independently obtain publicly available information regarding CAC candidates.

3. Purposes for which the information is being collected:

The Board primarily collects the information to inform the candidate selection process, and to aid the Board in its operation and management of the CAC.

4. Who will have access to the information:

Access to the information maintained in CAC is limited to authorized Board and Federal Reserve Bank staff who need the information for official business purposes. Disclosures may also be

made under the Freedom of Information Act (5 USC §552) and the Privacy Act of 1974 (5 USC §552a) in accordance with the Board's System of Records Notice, entitled BGFRS-39 "General File of the Community Advisory Council" and BGFRS-9 "Supplier Files."

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):

CAC candidates voluntarily submit the information to the Board. If a CAC candidate is selected to be a member, the Board may collect additional information (e.g., travel, honoraria, headshots, and staff contact information) as necessary to facilitate the member's service on the CAC or the work of the CAC. Once the information is submitted, individuals will not have an opportunity to consent to particular uses of the submitted information.

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

CAC candidates and members are responsible for ensuring the accuracy and completeness of any information they submit. Candidates are welcome to email the CAC inbox for updates to their information during the application window. Board staff also review publicly available resources to confirm CAC finalists' current employment information.

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

Pending an approved retention period, the CAC records will be retained indefinitely. Data submitted into the CAC Systems is sent to FIRMA, the Board's official recordkeeping system, on an annual basis.

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

PII is encrypted at rest and in transit. CAC follows applicable privacy and security controls in National Institute of Standards and Technology's (NIST) Special Publication 800-53, in accordance with the Federal Information Security Modernization Act (FISMA). The controls assist in detecting security violations and performance or other issues in the CAC Systems. CAC also has the ability to track individual user actions with the system.

Access to CAC is restricted to authorized users within the Board and Federal Reserve Banks 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, so users are restricted to data that is required in the performance of their official duties.

Periodic audits and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes in any information maintained in the CAC Systems.

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):

CAC Systems is covered by the System of Records Notice entitled BGFRS-39, “General File of the Community Advisory Council.” Payment information in CAC is covered by the System of Records notice entitled BGFRS-9, “Supplier Files.”

Reviewed:

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