



# **Privacy Impact Assessment of the Freedom of Information Act and Privacy Act Case Automation System**

**Program or application name:** Freedom of Information Act and Privacy Act Case Automation System (“Processing System”)

**System Owner:** Board of Governors of the Federal Reserve System’s (Board) Office of the Secretary

## **Contact information:**

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

The Freedom of Information Act and Privacy Act Case Automation System (Processing System) permits Board staff (which includes both employees and contractors) to track and respond to Freedom of Information Act (FOIA) and Privacy Act (PA) requests for records of the Board of Governors of the Federal Reserve System (Board) and the Federal Open Market Committee (“FOMC”). The Processing System consists of two services: the FOIAXpress service (FX) and the Public Access Link (PAL) portal.

The FX automates and streamlines the tracking, processing, and reporting of FOIA and PA requests. It allows Board staff to log and track the receipt and processing of each FOIA and PA request using data that is provided by the individual requesting the information (“requester”) or their representative and data that is automatically generated by the Processing System for the request (e.g., record number). Board staff use the Processing System to record the status of the request, relevant deadlines, other key events or data (such as the date of the response to the request), and any related administrative appeals. Board staff also use the Processing System to scan, store, redact, and manage copies of nonpublic records gathered in response to each request. Some of these nonpublic records may contain personally identifiable information (PII) about the requester or other individuals. The Processing System also tracks FOIA processing statistics and fees and generates reports on the number, type, and disposition of FOIA requests received.

The PAL is a secure web-based portal that enables individuals to submit and view the status of FOIA and PA requests, download requested documents, and view documents in the Board’s electronic reading room. Individuals may also upload additional information within PAL for review by the Board.

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

The Processing System contains PII from members of the public and Board staff. The Processing System collects some or all of the following personal information concerning the requester:

- Name (including prefix);\*
- Salutation, organization, and location of organization;
- Affiliation;
- Category of affiliation (e.g., commercial, media, educational, or other);\*
- Address (business or home);\*
- Telephone number (business, home, or cell);\*
- Facsimile number (business or home);
- E-mail address (personal or business);\*
- Summary of the information requested;\* and
- Citizenship status (only mandatory for Privacy Act requests).\*

Privacy Act requests must include two forms of identification, or a notarized statement attesting to identity, or a certification of identity under the penalty of perjury. Board staff or Credential Service Provider (CSP) staff require this information to verify identity in order to process Privacy Act requests.

The Processing System also generates tracking information for the request in the form of an individual case identifier. Requests from current or former Board staff may contain additional PII elements, including, but not limited to: service completion date, disciplinary records, personal email address, or other identifying information.

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\*Mandatory field if a request is submitted electronically.

In addition, the summary of the information requested section may contain unsolicited PII (such as bank account information or social security numbers) that the requester has provided to the Board. Such unsolicited PII is not required for the fulfillment of the individual's FOIA or PA request. Moreover, the Processing System could contain PII responsive to the request, such as financial information or other records. The records responsive to FOIA requests undergo additional review and potential redaction in order to remove PII that is not pertinent to the request. Additionally, communications (e.g., emails and letters) to and from the requester may include PII. The PII captured during this process is entered or scanned into Processing System for the purpose of adding to the requester record.

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

The requester or their representative and Board staff are the sources of the information. As noted above, the Processing System itself automatically generates processing information regarding the request. Board staff also update the information within the Processing System based on information from requesters (such as information required to verify the identity of the requester, notes from staff discussions with requesters, or the amount of fees paid by the requester), records required to fulfill the request that may include information about individuals, or information provided by other federal agencies that are referring requests to the Board for disclosure of records that originated with the Board.

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

The PII collected in the Processing System assists the Board in carrying out its responsibilities under the Freedom of Information Act and the Privacy Act. The information allows Board staff to process requests for records, which may include contacting requesters to clarify the information sought, assessing fees, and delivering responsive records.

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

Access to the information contained in the Processing System is restricted to authorized users who have a need for the information for official business purposes. This information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-23, "FRB—Freedom of Information Act and Privacy Act Case Automation System." Individual requesters using the PAL online request feature will only have access to their own registration and request information.

**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):**

The Board only collects and stores information required for official business purposes. The information collected by the Board is provided voluntarily by requesters or their representatives;

however, if the individual does not provide the information, they will not be able to make a FOIA or Privacy Act request.

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

The requester or their representative provides the personally identifiable information collected by the Processing System via mail, facsimile, PAL online requests, and related communications. When requests are not submitted via PAL online, Board staff manually enter the information into the Processing System. Additionally, other agencies may provide the information that is entered into the Processing System for referrals. The requester or their representative is responsible for providing accurate data to process the request. PII submitted outside the scope of the FOIA or PA request is retained only for completeness of records and no corrective action is taken regarding those records.

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

The Board retains the records for the approved retention period, which ranges from six years after final agency action or three years after final adjudication by the courts, whichever is later, but longer retention is authorized if required for business use.

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

The Processing System 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 and performance or other issues in the Processing System.

Access to the Processing System is restricted to authorized users 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 assessments and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes.

Privacy Act requests are subject to heightened identification proofing processes provided by a third-party CSP. These processes are carried out in order to ensure individuals only access the Privacy Act information made available to them by law.

