



Privacy Impact Assessment of Supervision Central

System Owner:

Board of Governors of the Federal Reserve System (“Board”) Division of Supervision and Regulation (S&R)

Contact information:

System Manager: Todd Vermilyea
Title: Senior Associate Director
Organization: Board of Governors of the Federal Reserve System
Division: Supervision and Regulation
Address: 20th Street and Constitution Avenue, N.W.
Washington, DC 20551
Telephone: (202) 912-4310

IT System Manager: Brent Richards
Title: Assistant Director
Organization: Board of Governors of the Federal Reserve System
Division: Supervision and Regulation
Address: 20th Street and Constitution Avenue, N.W.
Washington, DC 20551
Telephone: (202) 872-7543

Description of the IT system:

Supervision Central is a cloud-based system maintained by a Federal Reserve Bank on behalf of the Federal Reserve Board of Governors (“Board”). Supervision Central is utilized by bank examiners and supporting supervisory staff to create, review, store, and retrieve examiner-created documentation and documentation obtained from financial institutions during the supervisory process, which includes examination, enforcement, inspection, surveillance, ongoing monitoring and other activities. Bank examiners are employees of the Federal Reserve System (FRS) and supporting supervisory staff may be employees or contractors of either the Federal Reserve Board (FRB) or FRS. This documentation includes but is not limited to: examination planning documents, workpapers, electronic line cards, correspondence with institutions, meeting notes, and examiner analyses. The system allows the sharing of supervisory documents

between the Federal Reserve System and other bank regulatory agencies including the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, Consumer Financial Protection Bureau, state banking regulators, and foreign banking regulators consistent with the Board's regulations.

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

Financial institution records that are obtained and stored in Supervision Central in connection with supervisory activities may include personally identifiable information ("PII") about loans obtained by and accounts held by customers of supervised institutions. The PII in these records may include: customer name and contact information such as telephone numbers, home, and business addresses; identifying information such as driver's license number; social security number; birth date and place of birth; citizenship information and tax payer identification number; other information about the customer such as occupation and employment history and education and professional credentials. The records may also include information about the loan including loan and account numbers and payment information such as balances and interest rates. In addition, the customer and loan information may be present in compliance information including BSA/AML, OFAC, and other compliance matters. Finally, the records may also include PII about certain key employees and officers of supervised institutions, such as name; contact information (business – location, phone, email) and home address; details about their financial accounts; and potentially, information about compliance with applicable laws and regulations.

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

The information is provided by supervised financial institutions and other regulatory agencies during the course of the supervisory activities.

3. Purposes for which the information is being collected:

The Federal Reserve System uses the information to evaluate financial institutions' safety and soundness and compliance with consumer and community affairs laws and regulations. Although, during the course of an examination, examiners review documentation that includes PII about individuals, examiners use the information only to inform a conclusion based on the aggregate review of financial information. A limited amount of PII may appear on final reports to identify specific issues related to customer relationships within the financial institution under review. The PII is used to support analyses, findings, and potential supervision including enforcement activities. As noted, individual data may be used to support aggregate analysis of issues raised in connection with the supervisory process.

A subset of the records of this system that are initially collected to evaluate financial institutions' safety and soundness and compliance with consumer and community affairs laws and regulations will also, after the majority of qualitative incidental PII has been removed, be subject to additional analysis by automated systems. This subset will be manually copied from the Supervision Central system and placed into a separate system in order to execute the analysis by automated systems. The PII that remains in this subset will not be used in any form as the focus of this analysis is outside of records relating to individuals. Finally, this action is manual, as there are no systems that automatically push to or pull from the set of documents stored in Supervision Central.

4. Who will have access to the information:

The information maintained in Supervision Central is designated as confidential supervisory information and access is limited to authorized FRB and FRS employees, other federal and state regulators, and contractors on a need-to-know basis for official business purposes. The information may also be shared in Supervision Central as needed for conducting supervisory activities with staff of other bank regulatory agencies, including the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the Consumer Financial Protection Bureau, state banking regulators, and foreign banking regulators consistent with explicit information sharing arrangements that require access restrictions and security safeguards. Should it be necessary to grant access to a representative of these agencies, such access would be on a need-to-know basis and only for official business purposes. Representatives from supervised institutions have access to the system in order to submit information. That access is restricted to information submission and review of submitted information in connection with the individual supervised institution.

Authorized FRS employees will have access to the subset of records after analysis by automated systems has been completed.

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 by the Federal Reserve because the information is collected or created by the financial institution and thereafter obtained by the Federal Reserve in connection with its supervisory activities pursuant to the institution's statutory obligation to provide any and all requested financial records. Individuals do not have an opportunity to decline the inclusion of their records in the subset of records that undergo additional analysis by automated systems.

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

The PII in Supervision Central is obtained directly from the financial institution during the supervisory activities or from other regulatory agencies. The examiner-in-charge, central point of contact, or a designee, is responsible for ensuring the accuracy and completeness of the information acquired from the financial institution. The Federal Reserve does not alter the PII .

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

Supervision Central serves as a repository for supervision documents. Examination workpapers in Supervision Central are typically maintained for seven years after the end of the year in which the examination closed. However, in the event of a supervisory action, information in connection with the action may be maintained for thirty years. Final reports of examination, supervisory letters, and responses from firm management are maintained electronically for a minimum of 30 years. Records related to a supervisory determination are also maintained for a minimum of 15 years. In some cases, aggregate or summary data may be held for longer periods to support business cycle analysis. Electronic documents are purged from the appropriate database after the necessary retention period expires.

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

The Supervision Central system tracks individual user actions within the system. The audit and accountability controls are based on NIST and Bank standards which, in turn, are based on applicable laws and regulations, including the Federal Risk and Authorization Management Program (FedRAMP). The controls assist in detecting security violations and misuse of information in Supervision Central. The FRS is solely responsible for a subset of the total controls for this system, has joint responsibility for another subset of controls with the Cloud Service Provider (CSP), and the CSP is solely responsible for the final subset of controls.

Access to Supervision Central is restricted to authorized FRB and FRS employees, other federal and state regulators, and contractors who require access for official business purposes. In addition, authorized employees of supervised institutions will have access in order to submit information to the system. See Section 4 of this Assessment for additional details.

Users are classified into different roles and 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 only accessing PII data that is required in the performance of their duties.

Periodic audits and reviews are conducted to determine whether individual users still require access, have the appropriate role, and whether there have been any unauthorized changes to information maintained in Supervision Central. This system undergoes an annual review under the Security Assurance for the Federal Reserve (SAFR) program.

