



## **Privacy Impact Assessment of the eClearance System**

### **Program or application name.**

eClearance

### **System Owner.**

Board of Governors of the Federal Reserve System's ("Board")  
Management Division

### **Contact information.**

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### **Description of the IT system.**

eClearance is an IT system used by the Board's Management Division to track personnel suitability and security clearance investigations and adjudications (collectively referred to herein as "personnel security investigations") of Federal Reserve system employees, contractors, interns, and temporary employees. These personnel security investigations are

conducted to determine individuals suitability and security clearance for employment and/or access to sensitive Board information. eClearance maintains the status history of security clearances, which includes clearances granted once the personnel security investigations have been favorably adjudicated by Board staff. eClearance also maintains an audit trail to ensure that personnel security investigations are completed as required and adjudicated where appropriate. eClearance also monitors access to the records maintained in the system. eClearance is used as a mirror image of the Office of Personnel Managements Central Verification System, which is the key system supporting security clearance reciprocity throughout the Federal Government, as designated by the Intelligence Reform and Terrorism Prevention Act of 2004.

**1. Information concerning individuals that is being collected and/or maintained.**

eClearance may collect the following information on individuals:

- a. Name;
- b. Social Security Number;
- c. Date of Birth;
- d. Place of Birth;
- e. Clearance Type; and
- f. Comments about the subject individual

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

The subject individuals supply the personally identifiable information listed in item 1 on their completed background check and/or clearance forms (Standard Form 86, 85, or 85P).

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

The personal information collected and maintained in eClearance is used for on-going internal tracking of all personnel security investigations conducted pursuant to Executive Order 10450, Executive Order 12968, Executive Order 13488, Executive Order 13467, Executive Order 13526, Homeland Security Presidential Directive 12 (Policy for a Common Identification Standard for Federal Employees and Contractors), and the Intelligence Reform and Terrorism Prevention Act of 2004.

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

Access to the personal information maintained in eClearance is limited to authorized employees within the Federal Reserve System who have a need for the information for official business purposes. In addition, all information in the system may be disclosed for enforcement, statutory and regulatory purposes; to another agency or a Federal Reserve Bank; to a member of Congress; to the Department of Justice, a court, an adjudicative body or administrative tribunal, or a party in litigation; to contractors, agents, and others; and where security or confidentiality has been compromised.

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

Individuals may elect not to submit requested information; however, that failure will result in the Board's inability to consider information in connection with a personnel security investigation for suitability or security clearance.

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

The individual is responsible for the accuracy, completeness and timeliness of the information on their Standard Form 86, 85 or 85P. Board staff manually submits the information from the background investigation and clearance forms into the system. However, eClearance does provide data entry validation checks to ensure the information is entered correctly.

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

The information maintained in eClearance is destroyed upon notification of death or no later than 5 years after separation or transfer of employee or no later than 5 years after contract relationship expires, whichever is applicable. (General Records Schedule 18, Security and Protective Services Records, Item 22 a).

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

Access to eClearance is restricted to authorized Board employees and contractors who require access for official business purposes. Board 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. Periodic audits and reviews are conducted to determine whether authenticated users still require access and whether there have been any unauthorized changes in any information maintained in eClearance. eClearance sensitive personally identifiable information in the SQL server database is encrypted to provide another layer of protection against unauthorized access. Data cannot be read unless access is granted to the database and the application.

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

eClearance is already covered by the Personnel Security System Privacy Act system of records notice (BGFRS – 2).

**Reviewed:**

Raymond Romero <i>/signed/</i>	03/11/2013
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Chief Privacy Officer	Date
Sharon Mowry <i>/signed/</i>	03/11/2013
_____	_____
Chief Information Officer	Date