



Privacy Impact Assessment of the Consumer Complaint and Inquiry Systems

Program or application name:

Consumer Complaint and Inquiry Systems (CCIS)

System Owners:

Board of Governors of the Federal Reserve System's (Board) Division of Consumer and Community Affairs (DCCA) and the Federal Reserve Bank of Kansas City

Contact information:

System Manager: Phyllis Harwell
Title: Associate Director, Consumer Complaints
Division: Division of Consumer and Community Affairs
Address: 20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551
Telephone: (202) 452-3658

IT System Manager: Jeffrey Polding
Title: Manager
Bank: Federal Reserve Bank of Kansas City
Address: 1 Memorial Dr. Kansas City, MO 64198
Telephone: (816) 881-4783

Summary description of the program or application:

The Consumer Complaint and Inquiry Systems ("CCIS") is a series of systems listed in Attachment A that support the Federal Reserve System's ("FRS") business processes for receiving, responding to, monitoring and reporting consumer complaints, and inquiries related to financial institutions supervised by the Board. Consumer complaints and inquiries are received directly by the FRS via U.S. mail, telephone, facsimile, e-mail, and through

the Federal Reserve Consumer Help (FRCH) website.

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

CCIS contains the contact information for consumers and/or their designated representatives including, but not limited to, the individual's name, mailing address, phone number, and email address. CCIS may also contain personal information provided by the consumer relevant to the consumer's complaint or inquiry including information related to the consumer's transactions with specific financial institutions.

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

The sources of information include the consumers (or their representatives) who file a complaint or inquiry about an institution. Information may also come from appropriate federal, state, or local regulatory and enforcement agencies; and institutions or individuals that are the subject of the complaint or inquiry.

3. Purposes for which the information is being collected:

Individual information collected and maintained in CCIS relates to the Board's exercise of its statutory, regulatory, and supervisory authority. Such information is provided in order to process consumer complaints and inquiries from members of the public and/or their representatives. These records are collected and maintained to permit the Board to perform its responsibilities under the Federal Reserve Act, the Federal Trade Commission Act, and other consumer protection laws to respond to consumer complaints and inquiries regarding practices by banks and other financial institutions supervised by the Board.

4. Who will have access to the information:

Access to the information collected and maintained in CCIS is limited to authorized FRS employees and contractors who have a need for the information for official purposes. In addition, this information may be disclosed for the purposes set forth in the System of Records Notice entitled BGFRS-18, "FRB—Consumer Complaint 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):

Individuals are not required to submit any information. Moreover, once an individual has submitted information, he or she may withdraw his or her complaint or inquiry by written request at any time by contacting a FRS employee or contractor through the Federal Reserve Consumer Help (FRCH) website. The withdrawal of a pending request does not delete the record of the request's existence. However, if an individual withdraws his or her complaint or inquiry, the FRS will cease its investigation and for a complaint, acknowledge the withdrawal by sending a letter to the individual.

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

Once a record is created in Complaint & Inquiry Management System (CIMS), which is a component of CCIS, business and technical requirements ensure that the system captures all data occurrences and data elements for tracking and reporting data. The FRCH DataMart, which is another component of CCIS, is updated based on data changes to the CIMS. Automated validation checks for the system, such as email address formatting, numeric field compliance, and date field compliance ensure that data is entered and reported correctly. If a discrepancy caused by a technical issue is detected, it is reported to the CIMS Data Administrator, who will report the issue to IT and follow up on the matter until it is resolved. Both Board and FRCH staff have established quality assurance controls for the data contained in CIMS.

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

Consumer complaint case file records are destroyed when no longer needed for legal, financial, administrative or reference purposes 7 years after a final action is taken on a case in compliance with records retention authority N1-81-00-02, Item 16a, Special Investigation, Fair Lending Discrimination, and Consumer Complaint cases. Electronic data used to process a consumer complaint is deleted with related consumer complaint case file records in compliance with N1-81-00-02, Item 17, Tracking Systems. Consumer inquiries and referrals are destroyed after one year, but retained longer if required for business use, in compliance with NARA's General

Records Schedule 6.4, item 020. Aggregate information relating to the complaints, stripped of any personally identifiable information, is retained for ongoing data analytics and reporting purposes.

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

CCIS has the ability to track individual user actions within the system. The audit and accountability controls follow NIST and Board standards which are based on applicable laws and regulations. The controls assist in detecting security violations and performance or other issues in CCIS.

Access to the CIMS component of CCIS is restricted to authorized users, who are FRS employees or contractors with appropriate security credentials and who require access for official business purposes. Access rights for all users are role based and the user roles are used to delineate between the different types of access requirements based on user 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 CIMS.

The FRCH website is secured by technological controls that validate all input and servers that are protected through an application that analyzes traffic patterns to prevent malicious actions. Access to the information submitted to FRCH and the administration thereof is limited to authorized FRS staff.

The CIMS Data Administrator performs an annual verification process to ensure that all Board, FRCH, and Reserve Bank CIMS Data Administrators adhere to the Board's security procedures for maintaining and updating CIMS users.

Attachment A

CCIS includes the following systems and components maintained by the Federal Reserve Bank of Kansas City:

- The Complaint & Inquiry Management System (CIMS): an internal system that processes inquiries and complaints;
- The Federal Reserve Consumer Help (FRCH) website: the first intake point for inquiries and questions that are submitted electronically; and
- The FRCH DataMart, which is a metrics reporting tool for FRCH inquiries and complaints intake function.