

Privacy Impact Assessment of U.S Currency Education Program (CEP)

For Questions or Comments, please email: <u>privacy.comments@frb.gov</u>

Description of the IT system:

The Board of Governors of the Federal Reserve System's (Board) U.S. Currency Education Program ("CEP") educates the public on the security features and design characteristics of U.S. currency through its website (<u>www.uscurrency.gov</u>). Personally identifiable information (PII)¹ is voluntarily provided by the public and collected through three online webforms ("forms"):

- "Order Materials" Form: Printed materials can be ordered directly from the website and shipped to the public (e.g. individuals, educators, government entities, law enforcement, businesses).
- "Contact Us" Form: The public may reach out directly on any number of topics. This form is an alternative to email, which may not be a viable option on public/shared computers.
- "Event Registration" Form: The public may register for webinars or other currency education-related events by accessing the form through the CEP website, social media, email, brochures, or other methods of direct outreach.

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

Below is the PII collected from the online forms: "Order Materials," Contact Us, and "Event Registrations." (*Required fields).

Order Materials:

- First and Last Name*
- Email Address*
- Phone Number*
- Company/Organization*
- Address*
- Country (dropdown)*

¹ PII is information that can be used to distinguishor tracean individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. The Office of Management and Budget (OMB), OMB M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017).

- City*
- State/Province/Region (dropdown)*
- Zip/Postal Code*
- Industry (dropdown)*
- Free text area to describe how users plan to use the resources they are ordering*

Contact Us:

- Message Topic (dropdown)*
- First and Last Name *
- Email Address*
- Industry (dropdown)
- Country (dropdown)*
- Visitor's message*
- CAPTCHA challenge question*

Event Registration:

- Webinar (dropdown)*
- First and Last Name*
- Email Address*
- Country (dropdown)*
- Visitor's message
- Your Industry (dropdown)*
- CAPTCHA challenge question*
- Option to sign up for updates on U.S. currency news

Online orders are encrypted through the use of HTTPS and a corresponding SSL certificate. Individuals are asked to check a box indicating that they have read the UPS notice, Terms & Conditions, and acknowledge that import duties or other fees may apply to orders shipped outside the U.S.

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

Interested members of the public voluntarily provide their PII to the Board.

3. Purposes for which the information is collected:

The purpose of the information collection is to ship items as requested (*Order Materials form*), respond to inquiries from the public (*Contact Us form*), or to register for an educational event or webinar (*Event Registration form*).

4. Who will have access to the information:

Authorized Board staff have access to the information if they need it for official business purposes. For the *Order Materials* form, a third-party fulfillment vendor, under contract with the

Board, receives orders through a secure data transfer to package and ship orders directly to requestors.

Access to the content management and hosting systems ("systems") is restricted to authorized users within the Board, vendors, and contractors who require access for official business purposes. Regular 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 content management and hosting systems. The systems are able to track individual user actions. Disclosures may also be subject to the Freedom of Information Act (5 USC §552).

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 seeking to order materials or submit inquiries are asked to provide a minimum amount of PII for the Board to fulfill an order, reply to an inquiry, or to register for an event. A link to CEP's Privacy Statement on the website is available at the bottom of each page informing visitors of the collection, use, and protection of PII on the website and mobile applications.

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

The public is responsible for providing accurate and complete information on the *Contact Us, Event Registration*, and *Order Materials* forms to receive their requested orders, a response to their inquiry, or event registration confirmation.

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

CEP retains records for one (1) year after fulfilling an order or responding to an inquiry, or when the data is no longer needed for business use, whichever is appropriate.

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

Access to CEP information is limited to authorized users with an official business purpose. PII is encrypted at rest and in transit between the Board and its fulfillment vendor. CEP follows the applicable privacy and security controls in National Institute of Standards and Technology's (NIST) Special Publication 800-53 (Rev 5), *Security and Privacy Controls for Information Systems and Organizations*, in accordance with the Federal Information Security Modernization Act (FISMA), and is rated as a low impact system.

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):

CEP is not a system of records under the Privacy Act of 1974 since records are not regularly retrieved by name or unique personal identifier, so a system of records notice is not required.

Reviewed:	
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