



Privacy Impact Assessment of Comment Review System (CRS)

Program or application name:

Comment Review System (CRS)

System Owner:

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

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Description of the IT system:

The Comment Review System (CRS) is an application used by the Board to electronically process incoming comments from the public on rulemaking, regulatory, information-collection and other proposals. CRS provides Artificial Intelligence (AI) and Machine Learning (ML) features that enable more efficient processing of public comments. In particular, CRS provides text summarization, text matching with lists of topics, entity identification, and text similarity matching. In addition, CRS identifies duplicative or near-duplicative comment letters, provides

full text search (including metadata properties), and provides the optionality of providing notes or labelling comments based on various metadata attributes. Comment letters may be received in various formats (physical mail, form submission, email, etc.).

Importantly, the AI/ML features are designed to engage with the substance of the comments and assist in the development of Board or interagency rulemakings. It is not intended to focus on individual commenter's personally identifiable information (PII). However, because PII is typically associated with each comment, this Privacy Impact Assessment identifies the PII that is stored within CRS. The PII itself is not subject to processing by the AI/ML features of CRS.

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

For each comment submitted, the system collects some or all of the following personal information concerning the submitter of the comment (commenter):

- a. Title;
- b. First and last name;
- c. Affiliation/category of affiliation;
- d. Mailing address, including city, state, country, and postal code; and
- e. Email address (required if submitted via electronic mail to regs.comments@federalreserve.gov).

In addition, for each comment, the system permits commenters to provide additional information they believe to be relevant to the proposal, which may include additional personal information.

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

In most cases, the source of the information is the commenter. In instances where comments are received as part of interagency rulemaking, the source of the information may be comments originally received by another agency.

3. Purposes for which the information is being collected:

The purpose of CRS is to permit the Board to accept and consider public comments in connection with rulemaking and regulatory information collection. The system allows users to analyze the content of the comments, both the individual content of a specific comment as well as in relation to other comments through various machine learning processes. CRS collects a minimal amount of personal information to ensure that Board staff can determine the source of the comment and take steps, if necessary, to communicate with the commenter.

4. Who will have access to the information:

Comments are provided to Board staff and interagency staff for review in connection with preparing recommendations for interagency rulemaking or to Board staff in connection with Board rulemaking. Staff of individual Federal Reserve Banks may also review comments.

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 have the opportunity to decline to provide information by not submitting a comment and by limiting or eliminating the personal information provided to the Board. After submission, individuals do not have an opportunity to consent to particular uses of the information.

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

All personally identifiable information collected and maintained in CRS is generally provided directly by the commenter and may be supplemented by information from interagency staff. The system relies on the commenter to submit accurate, complete, and up-to-date information. In instances where comments are received as part of interagency rulemaking, the comments may be received from another agency and the system relies on the commenter and the originating agency to provide accurate information.

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

The retention schedule for these records is currently under review. Until the review is completed, the records in the system will not be destroyed and will be retained indefinitely.

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

CRS 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 CRS.

Access to CRS is restricted to authorized users within the Board 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 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 CRS.

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):

CRS is covered by an existing System of Records entitled BGFRS-11, "FRB-Official General Files."

Reviewed:

/signed/
Sharon Mowry
Senior Agency Official for Privacy and
Chief Information Officer

7/29/2022

Date