



Privacy Impact Assessment of the Electronic Governors' Systems

Program or application name:

Electronic Governors' Systems (E-Gov Systems)

Contact person(s) and telephone number(s):

E-Gov Systems are maintained by the Board of Governors of the Federal Reserve System's ("Board") Office of the Secretary.

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Summary description of the program or application:

The E-Gov Systems (E-Gov) are a series of information technology systems that the Board of Governors of the Federal Reserve System (the Board) uses to distribute information for voting and reference purposes. While the E-Gov Systems are neither intended to nor designed to collect personally identifiable information (PII), in some instances the E-Gov Systems (identified below) may, for certain items such as a Board vote on a banking application, include PII.

The E-Gov Systems that may contain PII are the following:

- Board Agenda Management System (BAMS) – Office of the Secretary (OSEC) staff use BAMS to distribute Board meeting agendas and meeting-related documents to Board members and select Board staff with a need to know. These staff include staff in the initiating division who are involved in preparing and presenting a meeting item, staff on the general distribution list approved by OSEC, and other Board staff identified by the initiating division.
- Delegated Authority (DA) – OSEC staff use DA to track and manage approvals made by the appropriate delegee (for example, the S&R director or General Counsel), under delegated authority. Board members have granted authority to delegees to approve specific types of actions.
- Information Only (IO) – OSEC staff use the IO system to securely send information that does not require action to Board members and select Board staff with a need to know.
- Minutes and Actions System (Minutes) – OSEC staff use Minutes to process the record of discussion, vote, and disposition of matters considered at each Board meeting and to record actions taken by the Board, by Board staff, or by Reserve Bank staff under delegated authority. Reserve Bank delegated actions are primarily related to banking applications.
- Notation Voting (NV) – OSEC staff use NV to process and distribute packages for action by Board members when an action will be determined without a Board meeting. Staff also use NV to record Board member votes on notation items.

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

Although the E-Gov Systems are not designed to capture PII and PII is not collected purposely, individual information *may* be contained within the E-Gov Systems because some action items may include PII. Examples of PII include an individual's name, address, telephone number, date of birth, place of birth, citizenship, and occupation, as well as information about companies the individual is affiliated with or other biographical information.

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

To the extent that PII may be contained in information transmitted in one of the E-Gov Systems, it may either be from individuals submitting information to the

Board or Federal Reserve Banks acting under delegated authority or it may be collected from other sources, *e.g.*, Board-supervised financial institutions.

3. The purpose for which the information is being collected:

The purpose of the E-Gov Systems is to distribute information for voting and reference purposes. To the extent that PII is present among the matters distributed using the E-Gov Systems, such information relates to the Board's exercise of its legal authorities pursuant to, but not limited to, the Dodd-Frank Act; the Federal Reserve Act, 12 U.S.C. §§ 221 *et seq.*; the Home Owners' Loan Act, 12 U.S.C. §§ 1461; the Change in Bank Control Act, 12 U.S.C. § 1817(j); the Bank Merger Act, 12 U.S.C. § 1828(c); the Federal Deposit Insurance Act, 12 U.S.C. §§ 1811 *et seq.*; the Bank Holding Company Act of 1956, 12 U.S.C. §§ 1841 *et seq.*; the Bank Service Company Act, 12 U.S.C. §§ 1861 *et seq.*; the International Banking Act, 12 U.S.C. §§ 3101 *et seq.*; the consumer protection laws regarding practices by banks and other financial institutions supervised and regulated by the Board; and the Board's Regulations, 12 C.F.R. §§ 201 *et seq.*

4. With whom the information will be shared:

The information contained in the E-Gov Systems is not accessible by the public. Access to data is limited to Board employees with a need-to-know the information for official business purposes. No contractors have access to the E-Gov Systems.

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):

As the E-Gov Systems are not intended to collect PII, individuals to whom the PII pertains will generally not have an opportunity to decline to provide the information or to consent to particular uses of the information before it is distributed in the E-Gov Systems. However, in the case of information derived from regulatory applications, notices, and proposals filed by the individual to whom the information pertains, the individual has the opportunity to decline to file the relevant application, notice, or proposal.

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

The accuracy, completeness, and timeliness of any PII is reliant upon the financial institution (or its agent) or the individual who initially provides information to

Board staff prior to its distribution in the E-Gov Systems. Board staff assigned to a particular regulatory matter under consideration will review data upon the receipt of the information or its initial entry into the E-Gov Systems, for sufficiency and completeness.

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

- Board Agenda Management System (BAMS) – The Board preserves documents in BAMS as part of the Board package in the Board’s electronic records management system. The Board package consists of the documentation presented to the Board for consideration or vote. The documents may include, but are not limited to, agendas, discount rate memoranda, proposed and final orders, staff recommendations (action memoranda), correspondence, congressional reports and testimony, enforcement orders, and Board policies. Board packages are permanent records that are retained in the Board’s electronic records management system indefinitely and transferred by the Board to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in the E-Gov Systems until no longer needed for administrative or reference purposes.
- Delegated Authority (DA) – Documents from DA are related to a variety of banking application, Reserve Bank administrative, regulatory, and supervisory matters that are approved under delegated authority. DA does not retain the record copy because the record copy is retained in the appropriate record system for a minimum of 15 years to permanent, depending upon the matter. The records from DA are retained in the E-Gov Systems until no longer needed for administrative or reference purposes. The Board transfers the permanent records to NARA pursuant to the applicable records schedules.
- Information Only (IO) – Documents from IO not related to Board meetings or banking applications are currently unscheduled and therefore are retained by the Board indefinitely in the E-Gov Systems. Documents from IO related to Board meetings are preserved as part of the permanent Board package in the Board’s electronic recordkeeping system. The Board transfers the records to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in the E-Gov Systems until no longer needed for administrative or reference purposes.

- Minutes and Actions System (Minutes) – Documents from Minutes, which consist of minutes of Board meetings, agendas, and records of notation voting, are permanent records. The Board transfers the documents from the Minutes to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in the E-Gov Systems until no longer needed for administrative or reference purposes.
- Notation Voting (NV) – The Board preserves documents from NV as part of the permanent Board package. The Board transfers the records to NARA pursuant to the applicable records schedule. The Board retains a copy of the documents in the E-Gov Systems until no longer needed for administrative or reference purposes.

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

Data security is provided using a layered approach that restricts access to designated authorized users in combination with robust technical controls. The Board restricts access to data in the E-Gov Systems to authorized Board employees who have a need for the information for official business purposes. The Board classifies E-Gov users into different roles, and common access and usage rights are established for each role. The Board establishes user roles to delineate between the different types of access requirements and limits most users to read-only access. BAMS, NV, and IO rely on a common security access controls whereas DA and Minutes have system-specific security access controls.

To maintain the integrity and reliability of the data maintained in the E-Gov Systems, user access is password-protected. Data deemed sensitive under the Board's information security policies are encrypted at rest and in transit for additional security. To maintain the reliability of the E-Gov Systems, the Board has implemented contingency processes and resources to permit the timely restoration of the E-Gov Systems. The Board tests the contingency processes twice a year.

9. Whether a new system of records under the Privacy Act will be created:

The E-Gov Systems do not require a system of records under the Privacy Act. To the extent that individual information is collected, maintained, or disseminated, it is not retrieved by reference to an individual's name or other personal identifier.

Reviewed:

/Signed/

6/19/2018

Raymond Romero
Senior Agency Official for Privacy

Date

/Signed/

6/19/2018

Sharon Mowry
Chief Information Officer

Date