



Privacy Impact Assessment of the Fed EZ File System

System Owner:

Board of Governors of the Federal Reserve System (“Board”), Division of Supervision and Regulation (“S&R”)

Contact information:

System Manager:	Vaishali Sack
Title:	Deputy Associate Director
Organization:	Board of Governors of the Federal Reserve System
Division:	Supervision and Regulation
Address:	20th Street and Constitution Avenue, N.W. Washington, DC 20551
Telephone:	(202) 452-5221
IT System Manager:	Brent Richards
Title:	Assistant Director
Organization:	Board of Governors of the Federal Reserve System
Division:	Supervision and Regulation
Address:	20th Street and Constitution Avenue, N.W. Washington, DC 20551
Telephone:	(202) 872-7543

Description of the IT system:

Fed EZ File (“EZ”) is a cloud-based system at the Federal Reserve Board of Governors (“Board”) and used by the Federal Reserve System (“FRS”), which includes the Board and the Federal Reserve Banks (“Banks”). FRS staff uses EZ to create, review, store, and retrieve information, including information obtained from individuals, financial institutions, and other business organizations, and authorized representatives for those individuals, financial institutions, and other business organizations (collectively, “filers”), in connection with applications, notices, requests for determinations, and other applications-related inquiries submitted by filers to the FRS (collectively, “filings”).

This information includes but is not limited to: responses provided on FRS filing forms, biographical information, financial statements and supporting financial information, criminal history report, credit reports, filing-related correspondence, and documents prepared by FRS staff, including, but not limited to, analysis memoranda and meeting and file notes. This information also includes comments submitted by members of the public in response to filings. The system allows the sharing of certain information outside of the FRS as described below in Section 4.

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

In connection with their role in filings, individuals provide information, which may include, but is not limited to the following:

1. Name (including former names and/or nicknames);
2. Contact information (telephone number, email address, etc.);
3. Address (home, business, and/or mailing);
4. Citizenship information;
 - a. Place and date of birth; and
 - b. Citizenship status;
5. Government-issued identification;
 - a. Driver's license number;
 - b. Social Security number;
 - c. Passport number or Alien Registration number; and/or
 - d. Taxpayer identification number;
6. Occupation and employment history;
7. Financial and credit information (including credit history);
8. Education and professional credentials;
9. Information about compliance with applicable laws and regulations, criminal history, and involvement with court proceedings; and
10. Related organizations.

In addition, submissions from members of the public may contain unsolicited personally identifiable information ("PII") (such as bank account information or social security numbers) even though such PII is not required for the individual to provide comments or feedback.

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

The information is submitted by individual filers, certain employees, officers, directors, or shareholders of financial institutions or other business organizations, representatives of individual or institutional filers, Federal and State banking regulators, and members of the public. FRS staff may also provide information to obtain access to the system. FRS staff may also independently obtain information regarding filers from publicly available sources.

3. Purpose(s) for which the information is being collected:

The FRS uses the information collected, including PII, to evaluate the ability of individuals, financial institutions, and other business organizations to meet the applicable statutory and regulatory factors for filings.

The U.S. Department of Justice receives copies of certain filings to evaluate the proposal with respect to competition independently of the Board and Reserve Banks.

4. Who will have access to the information:

Access to the PII maintained in EZ is limited to authorized FRS staff and certain entities outside the FRS, including, but not limited to, the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the Consumer Financial Protection Bureau, state banking regulators, and the Department of Justice. Information shared outside the FRS is shared on a need-to-know basis for official business purposes and is subject to information sharing arrangements that require access restrictions and security safeguards. In addition, the information may be disclosed for the purposes set forth in the System of Records entitled BGFRS-37, "FRB—Electronic Applications."

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):

For filings, individuals may decline to provide information or consent to particular uses of the information by the FRS other than for the uses listed in section 3, above. Individuals for whom additional information has been provided or shared by agencies or regulators outside of the FRS do not have the opportunity to decline the provision or sharing of that information or consent to particular uses of the information.

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

Filers are responsible for ensuring the accuracy and completeness of the information provided in connection with a filing. The FRS does not alter filing information, including PII. A filer may submit additional information to correct or update the information maintained in EZ at any time prior to disposition of a filing.

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

EZ serves as a temporary repository for records relating to each filing. Records in EZ are generally maintained for approximately sixty days after the final disposition of a filing, at which time they are transferred to a permanent records repository and purged from EZ.

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

EZ 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 or other issues in EZ.

Access to EZ is restricted to authorized FRS staff 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 information that is required in the performance of their duties. Periodic audits and reviews are conducted to determine whether users still require access and have the appropriate roles.

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):

The records in EZ can be retrieved by name or other identifier and are covered by an existing System of Records entitled BGFRS-37, "FRB—Electronic Applications".

Reviewed:

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

 8/10/2022
Date