



## **Privacy Impact Assessment of the Office of the Secretary Electronic Comments Routing System**

**System name:**

Office of the Secretary Electronic Comments Routing System (SECRS)

**System Owner:**

Board of Governors of the Federal Reserve System (Board) Office of the Secretary

**Contact information:**

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**Description of the system:**

The Office of the Secretary Electronic Comments Routing System (SECRS) is a system used by the Board to electronically process comments from the public on rulemaking, regulatory, information collection, and other proposals (collectively, “proposals”) and to post those comments to the Board’s public website,

<https://www.federalreserve.gov/apps/foia/proposedregs.aspx>.

The public may submit comments on proposals by completing an electronic comment form on the Board's public website, emailing the Board at [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov), or addressing mail correspondence to the Board's Office of the Secretary ("OSEC"). Comments submitted through the Board's public website are automatically uploaded to SECRS, and comments submitted by regular mail or email are manually entered into SECRS by OSEC staff.

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

While commenters are free to submit comments anonymously and without any other personally identifiable information, most commenters submit certain limited personally identifiable information with their comments. To the extent commenters submit personally identifiable information with their comments, SECRS maintains the following information fields pertaining to the commenters:

- a. Name (first name, middle initial, last name);
- b. Affiliation (if any)/Affiliation type (commercial; news media; educational; government; or other);
- c. Address; and
- d. Email address (for comments submitted via e-mail to [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)).

Although it is not requested or required, commenters may submit other personally identifiable information with their comments, including sensitive personally identifiable information such as Social Security number, financial or bank account information, and date of birth.

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

The source of the information is the individual who submits the comment or the individual's representative.

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

SECRS permits the Board to manage and analyze the numerous public comments the Board receives in connection with proposals. SECRS collects a minimal amount of personally identifiable information to ensure that Board staff can respond to commenters, if necessary.

**4. Who will have access to the information:**

Authorized Board employees and contractors who need to review comments relating to specific proposals for official business purposes are granted access to those comments on SECRS.

Comments are also made available for public inspection on the Board's public website<sup>1</sup> and are subject to disclosure under the Freedom of Information Act ("FOIA"). Prior to posting comments on the public website or disclosing comments in response to a FOIA request, Board staff remove home addresses of individual commenters and any sensitive personally identifiable information such as a Social Security Number or financial or bank account information that a commenter might voluntarily submit. Finally, comments containing personally identifiable information may also be disclosed for the purposes set forth in the System of Records Notice for BGFRS-11 "FRB—Official General Files."

**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 may submit comments anonymously or otherwise limit the personally identifiable information included with their comment submission. Individuals may also request that any sensitive personally identifiable information be redacted from comments posted on the public website.

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

All personally identifiable information collected and maintained in SECRS is provided by the individual submitting the comment or the individual's representative. The system relies on the individual to submit accurate, complete, and up-to-date information.

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

The retention for these records is currently under review. Until the retention period is determined, the records within SECRS will not be destroyed.

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

Access to the system is restricted to authorized users 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

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<sup>1</sup> With the exception of comments related to the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act") and comments related to the regulatory reviews required pursuant to the Economic Growth and Regulatory Paperwork Reduction Act of 1996 ("EGRPRA") to identify outdated or otherwise unnecessary requirements imposed on insured depository institutions, comments on proposals are generally available on the Board's public website until the Board takes final action on the proposal. Comments on all proposals related to the Dodd-Frank Act, including proposals that the Board has taken final action on, remain posted on the Board's public website. Comments solicited in connection with regulatory reviews pursuant EGRPRA to identify outdated or otherwise unnecessary requirements imposed on insured depository institutions remain on the Board's public website until the next EGRPRA review, which is conducted not less frequently than once every ten years.

requirements such that users are restricted to data that is required in the performance of their duties. Periodic assessments and reviews are conducted to determine whether users still require access, have the appropriate role, and whether there have been any unauthorized changes to the operation of the system or the underlying data.

**9. Whether a new system of records under the Privacy Act will be created or whether the system is covered by an existing system of records notice:**

SECRS is covered by an existing Privacy Act System of Records notice, entitled “FRB-Official General Files” (BGFRS-11).

**Reviewed:**

/signed/ 8/6/2021  
Raymond Romero Date  
Senior Agency Official for Privacy

/signed/ 8/9/2021  
Sharon Mowry Date  
Chief Information Officer