



Privacy Impact Assessment of the Internet Consumer Complaints System

Program or application name:

Internet Consumer Complaints System (ICCS)

Program or application implementation date:

April 2006

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

ICCS is maintained by the Board's Division of Consumer and Community Affairs (DCCA)

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Summary description of the program or application:

The ICCS will result in a single Internet site to enable the entry and routing of consumer complaints for the Federal Reserve System. Prior to implementation of the ICCS, the Federal Reserve System has multiple entry

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points for consumer inquiries and complaints. Currently, eight Reserve Banks accept complaints from the Internet. The other five provide a link to the Board's site for submission of complaints.

The Board's public internet Website (www.federalreserve.gov) will provide the means to collect the data into ICCS. Processing of the data will be provided by the Macromedia ColdFusion application server, which runs on www.federalreserve.gov. Temporary storage of the information will be provided by the ICCS database, which runs on the www.federalreserve.gov. However, the information input into ICCS will be forwarded to the Board's Complaints Analysis System and Reports (Web CAESAR) database for long term storage on the Board internal intranet. The Board has previously published a system of records notice for Web CAESAR under the Privacy Act, entitled "Consumer Complaint Information System," (BGFRS-18).

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

ICCS will collect the following data items about individuals:

- a. complaint text (required);
- b. salutation, first name (required);
- c. middle Initial, last name (required);
- d. street address line one (required);
- e. street address line two, city (required);
- f. state (required);
- g. zip/postal code (required);
- h. country (required);
- i. work phone, work extension, home phone, cell phone, fax, e-mail address, and institution name (only required for complaints); and
- j. name of the financial institution that is the subject of the complaint and the subject matter of the complaint.

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

The only source of information will be individuals who using the internet to access www.federalreserve.gov.

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

The information is collected to allow the Board to perform its responsibilities under the Federal Reserve Act, the Federal Trade Commission Act, and other consumer protection laws to respond to consumer complaints and inquiries regarding practices by banks and other financial institutions supervised by the Board.

The information is necessary to identify the individual complainant/inquirer, determine the specific complaint or concern; and facilitate a Board response to the individual complainant/inquirer once an investigation is completed.

4. Who the information will be shared with:

ICCS will be utilized to permit members of the public to submit complaints regarding banks and other financial institutions. After submission of a complaint into ICCS, the individual will receive a page restating his/her information as well as an e-mail (if an e-mail address is entered) containing the same information. Once the information is input into ICCS, there is no browsing, viewing or query capability. Moreover, there is no aggregation of data or reporting within ICCS by anyone, including Federal Reserve users. This is due to the fact that ICCS serves as a mere conduit to Web CAESAR.

Web CAESAR is maintained on the Board's internal intranet site for DCCA. Web CAESAR is a tracking system that allows authorized Board and Reserve Bank Complaint staff to track the progress of a complaint or inquiry submitted through ICCS from opening till closing. Web CAESAR permits authorized staff to enter status information, such as the type of complaint (credit card), sub-category (late payment fees), and how the complaint was resolved (information provided). Web CAESAR has various reporting functions which include data aggregation. Web CAESAR also provides authorized Board and Reserve Bank staff with browsing capability.

The following users will be authorized to have access rights, but will not normally view the data: Microsoft SQL Server database administrators and ICCS Developers. It should be noted that Microsoft SQL Server database

administrators (by definition) have all rights within a database server, but will not ordinarily access the ICCS data. ICCS Developers will only access the data to monitor the transfer of the information from ICCS into Web CAESAR on the Board's internal network.

Data immediately input by the public into ICCS will not be shared outside of the Board. Once the information in ICCS is forwarded to Web CAESAR, the information will otherwise only be accessed in Web CAESAR. For the most part, access to data maintained in Web CAESAR by a user is determined by the "need-to-know" requirements of the Privacy Act (this means to authorized employees within the Federal Reserve who have a need for the information for official business purposes). Care is taken to ensure that only those employees who are authorized and have a need for the information for official business purposes have access to that information. Other considerations are the user's job requirements and managerial decisions. The information maintained in Web CAESAR may also be shared consistent with the routine uses described in the Board's Privacy Act Systems of Records notice for Web CAESAR. For example, information in Web CAESAR will be subject to disclosure under the Freedom of Information Act or in connection with fair lending cases that may be referred to the U.S. Department of Justice. These uses are set forth in the Board's Privacy Act systems of records notice for Web CAESAR, entitled "Consumer Complaint Information System." (BGFRS-18).

5. Whether the individual 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 submitting information into ICCS may decline to provide the information by electing not to hit the "Submit" complaint button. The failure to submit the information will result in the Board's inability to consider the information in the complaint. Once the information is submitted into ICCS and forwarded to Web CAESAR, the individual does not otherwise have an opportunity to consent to particular uses of the information.

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

There are a number of actions taken to ensure that the information is free from malicious code. These actions include a routine that is applied to all form input fields that strips potentially malevolent characters. The SQL Server account that the public will use to access ICCS will have no direct access to any table in the system. Access will only be given to execute a limited number of predefined Structured Query Language (SQL) statements (stored procedures). None of these stored procedures will have the ability to retrieve ICCS data. Data will be deleted upon transfer to Web CAESAR on a daily basis. This will limit disclosure should someone gain access to ICCS data.

The information is examined to see if all of the required fields are entered (complaint text, first name, last name, street address line one, city, state, zip/postal code, country, and institution name - only required for complaints). If all fields are not entered, the transaction cannot be submitted.

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

The data will only be retained for one day in ICCS before it is forwarded into Web CAESAR. Upon transfer, the data will be deleted from ICCS and will not be recoverable because there will be no transaction log entries. After the data is forwarded to the Web CAESAR system, it will be stored for five years (as prescribed by Board record retention policy).

Any paper documents will be destroyed by shredding. Electronic information will be destroyed by deleting the information from the appropriate data base(s).

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

System access is limited only to database administrator and ICCS developers responsible to monitor the transfer of data to the Web CAESAR system. There is no inquiry or reporting capabilities in ICCS.

9. Whether a new system of records under the Privacy Act be created. (If the data is retrieved by name, unique number, or other identifier assigned to an individual, then a Privacy Act system of records may be created).

The ICCS does not require publication of a new system of records under the Privacy Act since there is no retrieval capability in ICCS of information by reference to an individual's name or other personal identifier. Once the data is transferred to the Web CAESAR system, it will be deleted from ICCS. Web CAESAR is already covered by a published Privacy Act system of records notice, entitled "Consumer Complaint Information System." (BGFRS-18).

Reviewed:

(signed) Marianne Emerson 3/15/06
Chief Information Officer Date