



## **Privacy Impact Assessment of the Web CAESAR System**

### **Program or application name:**

Complaint Analysis Evaluation and System Reports (Web CAESAR)

### **Program or application implementation date:**

March 2006

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

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

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### **Summary description of the program or application:**

Web CAESAR is a web-based application that supports the Federal Reserve System's business processes for receiving, responding, monitoring and

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reporting consumer complaints and inquiries that are filed against state member banks and other financial institutions supervised by the Board. Web CAESAR replaces an older system that is no longer supported by the system vendor. The new application provides better usability, easier user navigation, stronger report writing capability, and will allow on-line queries to be produced. Web CAESAR is maintained on the Board's internal intranet site for DCCA and it permits authorized Federal Reserve Bank and Board users to access the application from their workstations and remotely. Web CAESAR can have concurrent users at any given time. Web CAESAR is not accessible by the public or by users outside of the Federal Reserve System.

Consumer complaints and inquiries can be received directly by the Federal Reserve System via U.S. mail, telephone, or fax and then entered into Web CAESAR by consumer complaints staff. Consumers can also directly enter complaints and inquiries into the Board's Internet Consumer Complaints System (ICCS), a single site maintained on the Board's public Internet website ([www.federalreserve.gov](http://www.federalreserve.gov)) that enables entry and routing of consumer complaints and inquiries for the Federal Reserve System. The information input into ICCS is forwarded to Web CAESAR for long term storage.

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

- 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 (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 the individuals who file a complaint or inquiry about an institution that is a member of the Federal Reserve System, including individuals who use the Internet to access the Board's ICCS at [www.federalreserve.gov](http://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:**

Web CAESAR is maintained on the Board's internal intranet and is not accessible by the public. Web CAESAR allows authorized Board and Reserve Bank complaint staff to track the progress of a complaint or inquiry. 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, including data aggregation. It also provides authorized Board and Reserve Bank staff with browsing capability. The application also has a number of routine uses that are set forth in the Board's Privacy Act System of Records, entitled "Consumer Complaint Information System" (BGFRS-18).

The following users will be authorized to have access rights, but will not normally view the data: Database Administrators, Information Systems (IS), and Information Technology (IT) Developers (on as needed basis). It should be noted that Database Administrators (by definition) have all rights within a database server, but will not ordinarily access the Web CAESAR data. The IS Web CAESAR Administrator updates information and reports any security issues or application errors to IT. IT developers will only access the data to monitor any errors from the Web CAESAR application. The Board and RB Web CAESAR Administrators will have access to enter complaint and inquiry data into the database. They will also be able to add a new user and change or update their respective Web CAESAR users once their manager or officer approves the access forms and send it to the IS Web CAESAR Administrator.

For the most part, access to data by a user within the Board 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. 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. The information contained in Web CAESAR may also be disclosed to—

- a. a Board-regulated entity that is the subject of a complaint or inquiry;
- b. third parties to the extent necessary to obtain information that is relevant to the resolution of a complaint or inquiry;
- c. the appropriate governmental, tribal, self-regulatory, or professional organization if the information is relevant to a known or suspected violation of a law or licensing standard within that organization's jurisdiction;
- d. the appropriate governmental, tribal, self-regulatory, or professional organization if that entity has jurisdiction over the subject matter of the complaint or inquiry, or the entity that is the subject of the complaint or inquiry;

- e. the Department of Justice, a court, an adjudicative body, a party in litigation, or a witness if the Board determines that the information is relevant and necessary to a proceeding in which the Board, any Board employee in his or her official capacity, any Board employee in his or her individual capacity represented by the Department of Justice or the Board, or the United States is a party or has an interest;
- f. a congressional office when the information is relevant to an inquiry made at the request of the individual about whom the record is maintained;
- g. contractors, agents, or volunteers performing or working on a contract, service, cooperative agreement, or job for the Board;
- h. third parties when mandated or authorized by statute; or
- i. the National Archives and Records Administration in connection with records management inspections and its role as Archivist.

These uses are also 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 who file a complaint or inquiry regarding practices by banks and other financial institutions supervised by the Board may withdraw their written request to have a complaint or inquiry investigated. The failure to investigate a complaint will result in the Board's inability to consider information and likewise consider complaint issues raised in the complaint during the examination of the alleged practices of the state member bank. 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:**

Business and technical requirements were written when the Web CAESAR application was developed to ensure that the user captures all data occurrences and data elements for tracking and reporting data. Edit checks for the system were implemented from the technical requirements to ensure that data are entered correctly.

In addition, Web CAESAR data is reviewed by the Board's DCCA complaint staff upon initial entry of a complaint or inquiry, after completing a complaint investigation, and upon complaint or inquiry resolution. Further, staff routinely generates various consumer reports that were developed for the system to ensure that accurate data is reported. If any technical discrepancy with the data is detected, it is reported to the IS Web CAESAR Administrator, who will follow-up on the matter until it is resolved.

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

In accordance with the Board's record retention policy complaint data is retained for five years after a complaint is closed. Any paper documents will be destroyed by shredding.

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

There are three user access levels (administrator, read and write, and read-only) in Web CAESAR to secure information against unauthorized access. Database access is limited to authorized Board and Reserve Bank Web CAESAR Administrators and IT Developers (on as needed basis) to secure the information against unauthorized access. Access is given to users only after the Board IS Web CAESAR Administrator receives an electronic e-mail and an "Acquiring Access" Web CAESAR form from a Board or Reserve Bank manager or officer, in charge of a consumer affairs section, that approves user access. Once access is granted, the user's logon id and password is authenticated through the Board's or Reserve Bank's internal network system. This procedure will not require the user to enter a password again to access the Web CAESAR system.

When a user requires a change in access level, the Board or Reserve Bank manager or officer in charge of a consumer affairs section must forward an electronic e-mail and a "Change Request" access Web CAESAR form to the Board IS Web CAESAR Administrator that requests a change in access level. When a user no longer requires system access, the appropriate Board or Reserve Bank manager or officer must forward an electronic e-mail and "Deactivate Employee" Web CAESAR access form to the Board IS Web CAESAR Administrator to deactivate the user from Web CAESAR. There are reporting capabilities in the system to verify Web CAESAR users' access levels.

According to the FISMA requirements, controls are built into the Web CAESAR to automatically deactivate the users who do not login to the system for more than 180 days.

The Board IS Web CAESAR Administrator shall perform an annual verification process to ensure that all Board and Reserve Bank Web CAESAR Administrators adhere to the Board's security procedures for maintaining and updating Web CAESAR users. Pursuant to this annual verification process, the Board IS Web CAESAR Administrator will, by year-end, contact the Board and Reserve Bank Web CAESAR Administrators to confirm their Web CAESAR users. In the event that the annual verification process indicates that additional Web CAESAR users should either be activated or deactivated, the appropriate Board or Reserve Bank manager or officer will repeat the process as described above. If no changes are necessary, the appropriate Board or Reserve Bank manager or officer will send a user confirmation via email to the IS Web CAESAR Administrator. Once each Board or Reserve Bank manager or officer has completed his or her report, the Board IS Web CAESAR Administrator will produce a report on Web CAESAR that lists all active and inactive users to ensure that the Board and Reserve Bank Web CAESAR Administrators have completed their process.

**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).**

Web CAESAR is already covered under a Privacy Act System of Records notice, entitled “Consumer Complaint Information System” (BGFRS-18).

**Reviewed:**

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