

**Privacy Impact Assessment  
of  
Electronic Workpaper Program (EWP) Supervisory Systems**

**Program or application name:**

Electronic Workpaper Program (EWP) Supervisory Systems

**System Owner:**

Board of Governors of the Federal Reserve System's ("Board") Division of Banking Supervision and Regulation

**Contact information:**

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**Description of the IT system:**

EWP Supervisory Systems consist of multiple local software applications maintained by the Federal Reserve and utilized by examiners to create, review, store, and retrieve examiner-created documentation and documentation received from financial institutions during the supervisory process, which includes examination, inspection, surveillance and other processes. This documentation

includes: examination planning documents, workpapers, electronic or paper-based examiner line cards, correspondence with institutions, management information and other pertinent data from institutions, meeting notes, and examiner analyses. Appendix A contains a list of the EWP Supervisory Systems.

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

EWP Supervisory Systems are not designed to capture personal information. However, certain financial institution records that are requested, received, reviewed, and stored as part of the supervisory process may include personally identifiable information, such as:

- a. customer name;
- b. loan customer name;
- c. home address;
- d. social security number;
- e. tax payer identification number;
- f. driver's license number;
- g. birth date;
- h. place of birth;
- i. account numbers;
- j. loan account number;
- k. loan or account officer name;
- l. loan officer number;
- m. loan balances, interest rates and payment information;
- n. non-public confidential bank loan classifications;
- o. financial transaction data;
- p. non-public BSA/AML and OFAC documentation;
- q. non-public Suspicious Activity Reports (SARS); and
- r. subpoenas and related legal documentation.

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

The information is provided by supervised financial institutions during the course of the supervisory process.

### **3. Purposes for which the information is being collected.**

The Federal Reserve uses the information to evaluate financial institutions' safety and soundness and compliance with consumer and community affairs laws and regulations. Personally identifiable information obtained during the supervisory process is generally not specifically referenced by examiners, but may be used to support analyses and findings. For example, individual data may be used to support aggregate analysis of issues raised during the course of the examination or supervision process.

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

The information maintained in the EWP Supervisory Systems is designated as confidential supervisory information and access to it is generally limited to authorized Federal Reserve employees and contractors who have a need for the information for official business purposes. The information may also be shared as needed for conducting joint supervisory initiatives with the Federal Financial Institution Examination Council staff of other bank regulatory agencies, including the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, state banking regulators, and foreign banking regulators consistent with the Board's regulations as well as explicit information sharing agreements that require the implementation of access restrictions and security safeguards.

In addition, the information may also be disclosed for enforcement, statutory and regulatory purposes; to another agency or a Federal Reserve Bank, to a Member of Congress; to the Department of Justice, a court, an adjudicative body or administrative tribunal, or a party in litigation; to contractors, agents, and others; and persons who are reasonably necessary to assist in connection with the Board's efforts to respond to the suspected or confirmed compromise of security or confidentiality and prevent, minimize, or remedy such harm; or to other agencies, entities, and persons reasonably necessary to assist the Board's efforts to respond to a suspected or confirmed compromise of security or confidentiality to prevent, minimize or remedy such harm.

### **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 do not have an opportunity to decline to provide the information or consent to particular uses of the information because the information is not

collected from the individual. The information is collected directly from the financial institution during the bank examination or supervision process pursuant to the institution's statutory obligation to provide any and all financial records to its federal regulator. The information is acquired by the financial institution from its customers as a routine business activity.

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

All personally identifiable information in the EWP Supervisory Systems is obtained directly from the financial institution during the examination and supervision process. The examiner-in-charge, or a designee, is responsible for ensuring the accuracy and completeness of the information acquired from the financial institution.

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

EWP Supervisory Systems serve as a repository for examination and supervision documents. Examination workpapers, including those stored in the EWP Supervisory Systems are typically maintained for five years; however, in the event of a supervisory or enforcement action initiated by the Board of Governors, information may be maintained for three years after termination of such supervisory or enforcement action. In some cases, aggregate or summary data may be held for longer periods to support business cycle analysis. Paper documents are destroyed by shredding and electronic documents are purged from the appropriate databases after the retention period expires.

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

The Federal Reserve uses a combination of methods to secure the information contained in EWP Supervisory Systems. For example, EWP Supervisory Systems are: (1) maintained in Federal Reserve restricted-access facilities, (2) stored on access-controlled servers, and (3) encrypted if they are downloaded to an examiner's workstation (that is, laptop). Information security configurations for EWP Supervisory Systems are regularly reviewed to ensure ongoing compliance with the requirements defined in the Board's Information Security Program.

**9. Whether a new system of records under the Privacy Act will 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).**

No new system of records is required because any personally identifiable information maintained in connection with EWP Supervisory Systems is not retrieved by reference to an individual's name or other personal identifier.

**Reviewed:**

Charles S. Struckmeyer */signed/*

06/15/2010

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Chief Privacy Officer

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Date

Maureen Hannan */signed/*

06/15/2010

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Chief Information Officer

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Date

## Appendix A

The Federal Reserve currently deploys the following Electronic Workpaper Program Supervisory Systems:

- Electronic Workpaper Programs maintained by the Federal Reserve Bank of Atlanta, Federal Reserve Bank of Boston, Federal Reserve Bank of Chicago, Federal Reserve Bank of Minneapolis, Federal Reserve Bank of Richmond, Federal Reserve Bank of New York, Federal Reserve Bank of San Francisco, and Federal Reserve Bank of Cleveland;
- Supervisory Databases maintained by the Federal Reserve Bank of Boston, Federal Reserve Bank of Chicago, Federal Reserve Bank of Richmond, Federal Reserve Bank of New York, and Federal Reserve Bank of San Francisco;
- Examination Reports maintained by the Federal Reserve Bank of San Francisco;
- Electronic Documents maintained by the Federal Reserve Bank of San Francisco;
- International & Large Banking Group (ILBG) “Notebooks” maintained by the Federal Reserve Bank of San Francisco;
- Regional & Community Banking Organization Database maintained by the Federal Reserve Bank of San Francisco;
- Foreign Banking Organizations Database maintained by the Federal Reserve Bank of San Francisco; and
- Report Tracking System maintained by the Federal Reserve Bank Philadelphia
- Consumer Compliance Notes Database maintained by the Federal Reserve Bank of San Francisco, Consumer Affairs application maintained by the Federal Reserve Bank of Richmond.