



## Privacy Impact Assessment of Proposals and Public Comments System

For Questions or Comments, please email: [privacy.comments@frb.gov](mailto:privacy.comments@frb.gov)

### Description of the IT system:

This Privacy Impact Assessment (PIA) replaces the Office of the Secretary Electronic Comments Routing System PIA (2021).

Proposals and Public Comments (PPC) is a system used by the Board of Governors of the Federal Reserve System (“Board”) to electronically process and manage comments from the public on regulatory rulemakings, information collections, and other proposals (collectively, “proposals”) and to post those comments to the Board’s public website. The Board’s processing of comments may use artificial intelligence (AI) to provide more efficient processing of public comments (e.g., PII redaction recommendations, sentiment analysis, text matching, entity identification, and text similarity matching).<sup>1</sup> PPC is a module within the Board’s Enterprise Governance and Logistics System (EGLS), which is covered by a separate PIA available at [Federal Reserve Board - Privacy Impact Assessments \(PIAs\)](#).

The public may submit comments on proposals by completing an electronic comment form on the Board’s public website, emailing the Board at [publiccomments@frb.gov](mailto:publiccomments@frb.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 PPC, and comments submitted by postal mail or email are manually entered into PPC by OSEC staff.

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<sup>1</sup> Please see the Board’s [Comment Review System \(CRS\) Privacy Impact Assessment](#).

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

Commenters are free to submit comments anonymously, or voluntarily provide limited personally identifiable information (PII) (e.g., name, phone).<sup>2</sup> Commenters who use the Board's online electronic comment form may voluntarily provide the following PII:

- a. Name (first and last name);
- b. Phone number (only confirmed business numbers are publicly posted);
- c. Organization (if any) and organization type (organization, government, company);
- d. City, state, zip code/postal code, country; and
- e. Email address.

The only required portion of the electronic comment form is a free text area for individuals to provide their comments. **The public is strongly discouraged from providing unnecessary PII** (e.g., address, phone number) or sensitive PII (e.g., Social Security Number, financial or bank account information, legal status). For this reason, prior to submitting a comment, regardless of how they are submitted (online, e-mail, or paper form), comments will be made available publicly (either on the website or in paper form). Commenters are also notified that comments are reproduced exactly as submitted, except when alteration is necessary for technical reasons or to remove sensitive PII.

PPC may also use AI tools to enable more efficient processing and organizing of comments, including, but not limited to:

- Redaction of sensitive and non-sensitive PII,
- Topic identification and sentiment analysis (i.e., a numerical score indicates whether sentiment is low or high),
- Entity identification,
- Commenter categorization,
- Foreign language translation,
- SPAM detection, and
- Identify duplicative (or near duplicative) comments.

Importantly, AI recommendations will be verified and corrected, as appropriate, by Board staff. After submission, commenters do not have an opportunity to consent to the use of AI processing of comments.

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<sup>2</sup> PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. The Office of Management and Budget (OMB), OMB M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017).

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

Individuals or organizations submitting comments, or their authorized representatives (e.g., attorneys, trade groups).

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

PPC permits the Board to manage and analyze the large volume of public comments it receives. The Board may also use these comments to train and improve the capabilities of the PPC's AI tools. Commenters voluntarily choose to provide their PII, which facilitates Board communications with commenters, if necessary.

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

Authorized Board employees and contractors who need to review comments for official business purposes. Comments are also made available on the Board's public website and may be subject to disclosure under the Freedom of Information Act ("FOIA") (5 U.S.C. § 552). As discussed in PPC's System of Records Notice (SORN), BGFRS-11 "*Official General Files*,"<sup>3</sup> the Board, consistent with the Privacy Act of 1974 (5 U.S.C. § 552a), exercises certain exemptions and routine uses (i.e., defined circumstances under which records may be disclosed without the written consent of individuals to whom the records pertain).

**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 and organizations voluntarily submit comments to provide their thoughts on pending proposals. This may be done by submitting comments anonymously or by voluntarily providing limited PII. Commenters, however, do not have an opportunity to consent to the use of AI in processing their comments.

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

The system relies on the commenters (or their representatives) to provide accurate, complete, and updated information to the Board.

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

The records schedule is currently under review. These records will be retained indefinitely until a records schedule is approved.

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<sup>3</sup> System of Records Notices (SORNs), <https://www.federalreserve.gov/system-of-records-notices.htm>.

