FEDERAL DEPOSIT INSURANCE CORPORATION
INSURING AMERICA'S FUTURE

Privacy Impact Assessment (PIA)
for
Surveys, interviews, and focus groups (SIFG)

October 9, 2023

PURPOSE OF THE PRIVACY IMPACT ASSESSMENT

An FDIC Privacy Impact Assessment (PIA) documents and describes the personally identifiable information (PII) the FDIC collects and the purpose(s) for which it collects that information; how it uses the PII internally; whether it shares the PII with external entities, and the purposes for such sharing; whether individuals have the ability to consent to specific uses or sharing of PII and how to exercise any such consent; how individuals may obtain access to the PII; and how the PII will be protected. The FDIC publishes its PIAs, as well as its System of Records Notices (SORNs), on the FDIC's public-facing website,[1] which describes FDIC's activities that impact privacy, the authority for collecting PII, and the procedures to access and have PII amended or corrected if necessary.

SYSTEM OVERVIEW

The FDIC regularly engages members of the public to obtain their experiences, perspectives, and preferences on the FDIC, banking, and other areas related to its mission. The FDIC generally collects this feedback using methods such as surveys, interviews, and focus groups. Individuals who provide information during surveys, interviews, or focus groups do so voluntarily with the understanding that their responses will be kept confidential unless they consent to share their response. This PIA generally covers FDIC's collection, maintenance, and use of limited personally identifiable information (PII) in order to recruit individuals, facilitate correspondence, and perform analyses from results derived from these activities. Other surveys, interviews, and focus groups outside the scope of this PIA may require their own PIA coverage.

Surveys, interviews, or focus groups (SIFG) covered by this PIA may collect information, opinions, and experiences from those interacting with and on behalf of the FDIC. The goal is to obtain experiences, perspectives, and preferences on the FDIC, banking, and other areas related to its mission. This PIA only addresses voluntary participation by members of the public. This PIA does not address information collections required by statute, regulation, or otherwise as part of the FDIC's supervisory function, including in connection with bank examinations, visitations, investigations, or similar matters.[2]

Although the surveys, interviews, or focus groups assessed in this PIA are generally anonymous, the FDIC sometimes collects a limited amount of contact information in order to solicit participation in the research or facilitate future communications with participants.

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[1] www.fdic.gov/privacy

[2] See *Examination Tool Suite (ETS)* and *Framework for Oversight of Compliance and CRA Activities User Suite (FOCUS)* PIAs at www.fdic.gov/privacy for those information collections.

Demographic information (e.g., age, gender, race, country of origin, or languages spoken) may be collected and aggregated to perform analyses.

The FDIC may either rely on federal employees and contractors to conduct these surveys, interviews, or focus groups, or it may enter into contractual relationships with third-party vendors to conduct the research on its behalf. As described below, the FDIC may recruit research participants directly or indirectly and generally uses three different research methods to collect information: surveys, interviews, and focus groups.

Recruiting Participants

The FDIC recruits participants for its surveys, interviews, or focus groups using both direct and indirect recruitment. Direct methods of recruitment include contacting potential participants in person at a FDIC field office or FDIC-sponsored event, or contacting them by email, phone, and direct mail, among others. The FDIC may use contact information that was voluntarily provided on official FDIC forms submitted previously for other purposes (e.g., registration for an event). The notice of the FDIC's ability to use information previously supplied on a form must be contained in that form's Privacy Act Statement or Privacy Notice before it can be used for recruitment purposes.

Indirect recruitment requires the participant to volunteer for surveys, interviews, or focus groups advertised by the FDIC or solicited by third parties acting on behalf of the agency. This includes FDIC public announcements and advertisements in industry trade journals, mailing lists, flyers, or the internet, among others. The FDIC also publicizes opportunities to participate in surveys, interviews, or focus groups through community-based organizations and professional associations. The FDIC also may receive basic contact information from associations or organizations.

Recruitment of participants for surveys, interviews, or focus groups is conducted by divisions, outreach units, research units, or third-party vendors, and not by those responsible for information collections required by statute, regulation, or otherwise as part of the FDIC's supervisory function, including in connection with bank examinations, visitations, investigations, or similar matters. Participation in surveys, interviews, or focus groups covered by this PIA is voluntary and has no positive or negative impact on an individual's status or interaction with the Corporation.

Any contact information collected during FDIC's surveys, interviews, or focus groups is optional and used only to conduct analysis, follow-up, and to send invitations to participate in future research. Apart from incidental use to facilitate analysis, PII collected from participants is separated from their responses to avoid identifying individual participants unless participants provide express consent.

Surveys

Surveys are an efficient and cost-effective way to collect information and experiences from participants. Surveys are particularly useful for collecting and processing quantifiable data when they primarily use closed-ended questions (i.e., must be answered using a pre-defined

answer, like “yes or no” or reflecting a range of agreement or disagreement with a particular question) that make it easier to compare responses and limits the risk of participants disclosing unsolicited PII. Surveys may be administered by using FDIC generated surveys or third-party survey tools.

FDIC Administered Surveys

The FDIC conducts its surveys by phone, online, or on paper, among others. Surveys conducted by phone are sometimes audio recorded, which requires participants to provide verbal consent to proceed. Paper surveys are completed either by mail or in-person, typically at FDIC-sponsored conferences and trainings, FDIC worksites, or other FDIC locations. The FDIC provides potential survey participants with a notice about the purpose of any survey, instructions on how to complete such surveys, and where appropriate a caution to not provide any unsolicited PII in open text fields, and how to opt-out of future surveys.

Completed surveys, regardless of venue, are destroyed when no longer needed or in accordance with FDIC record retention schedules.

Third Party Vendor Survey Tools

The FDIC uses survey tools developed by third party vendors. Some of these are commercial off-the-shelf (COTS) products, while others are developed specifically for one or more FDIC surveys. The FDIC Privacy Program approves third-party survey tools prior to its use to ensure the vendor has incorporated the appropriate privacy safeguards. Many third-party survey tools contain recruitment features, such as the ability to email a link to prospective survey participants, or to make surveys available on the FDIC or third party websites. Although some commercial survey tools can automatically collect participants’ Internet Protocol (IP) addresses and email addresses, the FDIC advises survey developers to disable IP address and email collection whenever possible.

Interviews

The FDIC conducts interviews by phone, in-person, or other methods. Interviews gather information on a specific set of topics and typically allow for more open-ended questions than surveys. The interaction between the interviewer and participant lends itself to follow-up questions enabling a more in-depth understanding of participants’ experiences and perspectives. Interviews also tend to be more effective means of eliciting information on matters participants may not feel comfortable discussing in a group setting.

Interviews are sometimes recorded. Recording allows interviewers to collect direct quotes, verify the information recorded in field notes, and drastically improves the efficiency of note-taking. Participants are asked for their affirmative consent prior to recording and are advised not to disclose any PII when being recorded. Any PII associated with a participant’s consent is destroyed when the underlying recording is destroyed. As with surveys, any recordings of interviews are destroyed in accordance with FDIC records retention schedules.

Focus Groups

Focus groups are dynamic group discussions designed to collect information, gather feedback, and conduct observations from a number of participants at the same time. Like interviews, focus groups allow for more open-ended questions and discussion than surveys and permit greater insight into individual experiences and perspectives.

The FDIC conducts focus groups online, in-person, or other appropriate methods. Individuals who volunteer to participate in a focus group session are advised that their responses are anonymous. In some focus groups, participants agree to be quoted and to have their comments disseminated to the public. Participation in this type of focus group is voluntary and participants are allowed to decline to have their responses recorded or disseminated, but participants who decline recording or dissemination may be precluded from participating. Responses to focus group questions from individuals are collected and retained through transcription services, audio, and video recording, among other means. As with interviews, the FDIC seeks affirmative consent from participants prior to recording.

Interviewers and facilitators may ask for some basic PII to facilitate the information collection. The interviewer or facilitator have a set of questions to ask and are given guidance to not ask for more information outside of that set of questions to control against over collection of PII. Recordings are stored either in FDIC outreach or research unit systems or with a third-party contractor that the FDIC has retained to conduct the research. Access to these systems is restricted to those users with a verified business need. Recordings, transcripts, and any corresponding evidence of participant consent, are destroyed in accordance with the approved FDIC records retention schedule.

Usability Testing

Usability testing is a type of focus group that examines the uses and convenience of a particular product that the FDIC is interested in deploying. The FDIC conducts usability tests to determine if nascent programs or IT systems will achieve their desired purpose when deployed. Usability testing evaluates a system or program by eliciting participants to complete typical program tasks while facilitators observe, collect qualitative and quantitative data, and takes notes. Participants are generally video recorded completing the prescribed tasks. Participants are required to give affirmative consent prior to any recording taking place. Usability testing does not require the provision of PII. If necessary, mock data may be provided to a participant to test the ease and usability of a particular system. The goal is to identify potential problems that may only be apparent in real world interactions.

Recordings

The FDIC may augment its note-taking with audio or video recording of interviews or focus groups or may capture information shared in other formats, including in transcripts or by preserving written comments provided by participants. During the recruitment step participants will be informed if recordings will be used and must give consent to be recorded. Interviewers or facilitators must remind participants of their consent and indicate that the recording will begin. Recordings are stored by the FDIC or with the third party contractors the

FDIC contracted to conduct the surveys, interviews, or focus groups. Access to these systems is restricted to those users with a verified business need.

Survey, Interview, and Focus Group Analysis and Outputs

At the conclusion of surveys, interviews, or focus groups, the FDIC statistical or research experts aggregate or anonymize the data collected from participants because the goal is to identify findings relevant to groups and not to individuals within those groups. Anonymized data is then analyzed, results are documented, and may be made public. A report or other work product may then distributed to appropriate FDIC stakeholders and the general public, when appropriate. There is no PII included in the published reports—only aggregated data is distributed in the published reports.

PRIVACY RISK SUMMARY

In conducting this PIA, FDIC identified potential privacy risks, which are summarized below and detailed in the subsequent sections of this PIA. As indicated, recommendations to mitigate those risks were addressed with stakeholders during the assessment. The privacy risks for this system are categorized within the following privacy functional areas:

- Minimization
- Data Quality and Integrity
- Use Limitation

Minimization

Privacy Risk: There is a risk that the FDIC will collect more information than necessary for purposes of future recruitment, correspondence, or for its reports and analyses

Mitigation: The risk is mitigated. The purpose of FDIC surveys, interviews, or focus groups is the collection of opinions and experiences of participants, not to collect PII. Although personal contact and demographic information is sometimes collected from participants, this information is aggregated or anonymized and does not identify individuals. Survey, interview, and focus group questions are reviewed in advance and approved by the FDIC Privacy Program. Interviewers and facilitators will not solicit PII from participants, in turn, participants are advised not to provide PII in a survey's open text fields and during interviews and focus groups sessions. The FDIC may also give participants the option to voluntarily provide limited contact information to facilitate future correspondence (e.g., informational pamphlets, email notifications), but participants are informed that they are not required to provide this information and their PII is not linked to the answers they provided during the surveys, interviews, and focus groups. If they choose to provide this information, the FDIC only uses it for follow-up and future recruitment purposes.

Data Quality and Integrity

Privacy Risk: There is a privacy risk that collecting certain types of information (e.g., demographic information) or collecting information in an open-ended manner may allow for re-identification of a participant if the sample size is small and a specific participant's response is unique.

Mitigation: This risk must be mitigated on a separate basis for each individual survey, interview, or focus group effort. The FDIC has instituted procedural safeguards to ensure the confidentiality of survey takers is protected, including through the PTA process. Questions that are deemed unnecessary or too specific to an individual during surveys, interviews, and focus groups are considered to be "over-collections" of information and are dropped from the questionnaire prior to distribution of the survey, interview, or focus group or additional steps must be taken to remove the identifying information. Additionally, programs must work with the FDIC Privacy Program to determine appropriate thresholds to ensure that individuals cannot be re-identified.

Purpose and Use Limitation

Privacy Risk: There is a risk that the FDIC could use the information collected for purposes other than that for which the information was collected, including for operational uses.

Mitigation: FDIC mitigates this risk by only collecting information that is directly related to the survey, interview, or focus group. All recruitment of participants for surveys, interviews, and focus groups is conducted only by FDIC outreach units, research units, or third-party vendors, and not by those responsible for management, benefits, services, or enforcement decisions within the Corporation. All PII collected is destroyed once it is aggregated into the reports and any contact information collected for the purpose of future correspondence is separated from the answers provided by each participant. Information collected during the survey, interview, or focus group resides within the FDIC division or office statistical or research unit or contractor that is responsible for producing statistical and demographic analysis. Furthermore, all FDIC employees and contractors are required to take annual privacy training and are subject to discipline for inappropriately using PII.

Section 1.0: Information System

1.1 What information about individuals, including PII (e.g., name, Social Security number, date of birth, address) and non-PII, will be collected, used or maintained in the information system or project?

The FDIC conducts surveys, interviews, or focus groups to gather experiences and opinions from FDIC customers other stakeholders about a particular FDIC program or service. The type of information collected varies depending on the particular subject of the survey, interview, or focus group. However, the FDIC may collect on an optional basis limited contact information such as name, phone number, and email address from participants for initial and future recruitment efforts or correspondence. Participants may also be asked to provide optional demographic information such as age, gender, race, country of origin, or personal occupation. This information may be collected using pre-determined questions or through an open-ended discussion. All demographic information provided by participants is aggregated so as not to identify individual participants. Audio or video recordings of a participant may be collected during interviews or focus groups to aid a facilitator's note taking. A consent form that may contain a participant's name and signature may be collected prior to the recording.

PII Element	Yes
Full Name	☒
Date of Birth	☐
Place of Birth	☒
Social Security number (SSN)	☐
Employment Status, History or Information	☒
Mother's Maiden Name	☐
Certificates (e.g., birth, death, naturalization, marriage)	☐
Medical Information	☐
Address	☒
Phone Number(s)	☒
Email Address	☒
Employee Identification Number (EIN)	☐
Financial Information (e.g., checking account #/PINs/passwords, credit report)	☐
Driver's License/State Identification Number	☐
Vehicle Identifiers (e.g., license plates)	☐
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records)	☐
Education Records	☒

Criminal Information	☐
Military Status and/or Records	☒
Investigation Report or Database	☐
Biometric Identifiers (e.g., fingerprint, voiceprint)	☐
Photographic Identifiers (e.g., image, video)	☒
User Information (e.g., User ID, password)	☒
Specify other: Audio recordings, demographic information	☒

1.2 What are the sources of the PII in the information system or project?

Data Source	Description of Information Provided by Source
Participants	Contact information, Audio and Video recordings, Demographic information, Employment data, Military Status, User information
FDIC Systems	CASE Management Systems, HR Systems, Directory
Third-party Contractors	Participant Information

1.3 Has an Authority to Operate (ATO) been granted for the information system or project?

All FDIC information systems must achieve an ATO via the Assessment & Authorization process that aligns with the Risk Management Framework. Information systems that process participant information have been granted ATO or are in the process to achieve ATO. The ATO for each FDIC system is periodically reviewed as part of the FDIC Ongoing Authorization process.

Not all Surveys, Interviews, and Focus Groups use FDIC information systems, and so in some instances the ATO requirement does not apply.

Section 2.0: Transparency

Agencies should be transparent about information policies and practices with respect to PII, and

should provide clear and accessible notice regarding creation, collection, use, processing, storage, maintenance, dissemination, and disclosure of PII.

2.1 How does the agency revise its public notices to reflect changes in practice or policy that affect PII or changes in its activities that impact privacy, before or as soon as practicable after the change?

Through the conduct, evaluation and review of PIAs and SORNs, the FDIC ensures notices are revised to reflect changes in practice or policy that affect PII or changes in activities that may impact Privacy as soon as practicable.

2.2 In the Federal Register, under which Privacy Act Systems of Record Notice (SORN) does this information system or project operate? Provide number and name.

The following SORN(s) may apply to the system or project: FDIC-040, Mailing, Event, and other Contact Lists, which covers individuals who request to receive information; subscribe to newsletters; seek materials from FDIC; register or participate in FDIC sponsored or FDIC-funded events or contests; respond to surveys or feedback forms from FDIC or a third party contracted by FDIC; have business with the FDIC and provide their contact information; or otherwise provide contact information to facilitate future communication or collaboration with the FDIC.

2.3 If the information system or project is being modified, will the Privacy Act SORN require amendment or revision? Explain.

No, FDIC-040 provides sufficient coverage for surveys, interviews, and focus groups. Generally, the FDIC conducts reviews of its SORNs every five years or as needed.

2.4 If a Privacy Act Statement[3] is required, how is the Privacy Act Statement provided to individuals before collecting their PII? Explain.

The information collected in surveys, interviews, and focus groups is provided directly by the individual. The FDIC provides notice to individuals through a Privacy Act Statement. Facilitators verbally inform in-person or over the phone participants that providing information is strictly voluntary. When the FDIC extracts previously collected contact information from its systems to recruit potential participants, notice

[3] *See* 5 U.S.C. §552a(e)(3). The Privacy Act Statement provides formal notice to individuals of the authority to collect PII, the purpose for collection, intended uses of the information and the consequences of not providing the information.

is provided through a Privacy Act Statement on the initial collection form. For recruitment of participants that are not in FDIC systems, the Privacy Act statement will inform individuals that their contact information may be used for future surveys, interviews, and focus groups.

The FDIC ensures that its forms, whether paper-based or electronic, that collect PII display an appropriate Privacy Act Statement in accordance with the Privacy Act of 1974 and FDIC Directive 1213.01 "Forms Management Program."

2.5 How does the information system or project ensure that its privacy practices are publicly available through organizational websites or otherwise? How does the information system or project ensure that the public has access to information about its privacy activities and is able to communicate with its Senior Agency Official for Privacy (SAOP)/Chief Privacy Officer (CPO)? Explain.

The FDIC Privacy Program page provides access to agency SORNs, PIAs, Privacy Policy, and contact information for the SAOP, the Privacy Program Chief, and the Privacy Program (Privacy@fdic.gov). For more information on how FDIC protects privacy, please visit www.fdic.gov/privacy.

Privacy Risk Analysis: Related to Transparency

Privacy Risk: There are no identifiable privacy risks related to transparency for SIFG.

Mitigation: No mitigation actions are recommended.

Section 3.0: Access and Amendment

Agencies should provide individuals with appropriate access to PII and appropriate opportunity to correct or amend PII.

3.1 What are the procedures that allow individuals to access their information?

No access or redress can occur regarding participant responses because responses given during surveys, interviews, or focus groups are, by design, not linkable to a participant. In general participant responses are anonymous and are not unique enough to allow for identification of an individual. FDIC outreach or research units or third party contractors aggregate or anonymize all information they collect from

participants such that it cannot be linked to individuals. Because participants are anonymized, individuals may not be able to access the information they provided. If participants are interested in accessing information they previously provided to the FDIC for future contact or for the purposes of a benefit or other request, individuals are encouraged to contact the FDIC Freedom of Information Act (FOIA) Office. Additional information about FOIA is available at http://www.fdic.gov/foia.

3.2 What procedures are in place to allow the individuals to correct inaccurate or erroneous information?

No access or redress can occur regarding participant responses because responses given during surveys, interviews, or focus groups are, by design, not linkable to a participant. In general participant responses are anonymous and are not unique enough to allow for identification of an individual. FDIC outreach or research units or third party contractors aggregate or anonymize all information they collect from participants such that it cannot be linked to individuals. Because participants are anonymized, individuals may not be able to access the information they provided. If participants are interested in accessing information they previously provided to the FDIC for future contact or for the purposes of a benefit or other request, individuals are encouraged to contact the FDIC Freedom of Information Act (FOIA) Office. Additional information about FOIA is available at http://www.fdic.gov/foia.

3.3 How does the information system or project notify individuals about the procedures for correcting their information?

Participants who wish to request correction to their personal information may submit that request in writing directly to the FDIC point of contact, as each survey, interview, and focus group will have its own redress procedures.

Privacy Risk Analysis: Related to Access and Amendment

Privacy Risk: There is a risk that individuals will not be able to correct any incorrect information that FDIC collected during surveys, interviews, or focus groups.

Mitigation: The risk is mitigated. The FDIC refrains from collecting PII from participants whenever possible and immediately aggregates any demographic information collected during surveys, interviews, or focus groups. Information given during surveys, interviews, or focus groups, therefore, will be difficult to access or amend. PII and participant responses are provided directly from the individual, and then the PII is separated from a participant's responses. The FDIC ensures that all information, incorrect or not, is not associated to a

single participant. The FDIC collects a sufficient amount of responses during surveys, interviews, or focus groups to ensure that one participant's erroneous information will not adversely affect the statistics and analysis generated from its research, or have any adverse or operational impacts on the participant.

Section 4.0: Accountability

Agencies should be accountable for complying with these principles and applicable privacy requirements, and should appropriately monitor, audit, and document compliance. Agencies should also clearly define the roles and responsibilities with respect to PII for all employees and contractors, and should provide appropriate training to all employees and contractors who have access to PII.

4.1 Describe how FDIC's governance and privacy program demonstrates organizational accountability for and commitment to the protection of individual privacy.

FDIC maintains a risk-based, enterprise-wide privacy program that is based upon sound privacy practices. The FDIC Privacy Program is compliant with all applicable laws and is designed to build and sustain public trust, protect and minimize the impacts on the privacy of individuals, while also achieving the FDIC's mission.

The FDIC Privacy Program is led by the FDIC's Chief Information Officer (CIO) and Chief Privacy Officer (CPO), who also has been designated as FDIC's Senior Agency Official for Privacy (SAOP). The CIO/CPO reports directly to the FDIC Chairman, and is responsible for ensuring compliance with applicable federal privacy requirements, developing and evaluating privacy policy, and managing privacy risks. The program ensures compliance with federal privacy law, policy, and guidance. This includes the Privacy Act of 1974, as amended; Section 208 of the E-Government Act of 2002; Section 522 of the 2005 Consolidated Appropriations Act; Federal Information Security Modernization Act of 2014; Office of Management and Budget (OMB) privacy policies; and standards issued by the National Institute of Standards and Technology (NIST).

The FDIC's Privacy Program supports the SAOP in the management and execution of the FDIC's Privacy Program.

4.2 Describe the FDIC privacy risk management process that assesses privacy risks to individuals resulting from the collection, sharing, storing, transmitting, use, and disposal of PII.

Risk analyses are an integral component of FDIC's Privacy Program. Privacy risks for new and updated collections of PII are analyzed and documented in Privacy Threshold Analyses (PTAs) and Privacy Impact Assessments (PIAs). The Privacy Program looks across all FDIC systems and programs to identify potential areas of privacy risk. The PTA is used to assess systems or sub-systems, determine privacy compliance requirements, categorize systems, and determine which privacy controls should be assessed for each system.

4.3 Does this PIA capture privacy risks posed by this information system or project in accordance with applicable law, OMB policy, or any existing organizational policies and procedures?

Yes, this PIA captures privacy risks posed by the surveys, interviews, and focus groups through the privacy risk analysis sections throughout the document. PIAs are posted on FDIC's public-facing website, https://www.fdic.gov/policies/privacy/index.html.

4.4 What roles, responsibilities and access will contractors have with the design and maintenance of the information system or project?

The FDIC may rely on contractors dedicated to research and statistical analysis to conduct these surveys, interviews, or focus groups, or it may enter into contractual relationships with third-party vendors to conduct the research on its behalf.

Due to contractors' access to PII, contractors take mandatory annual information security and privacy training. Privacy and security-related responsibilities are specified in contracts and associated Risk Level Designation documents. Privacy-related roles, responsibilities, and access requirements are documented in relevant PIAs.

4.5 Has a Contractor Confidentiality Agreement or a Non-Disclosure Agreement been completed and signed for contractors who work on the information system or project? Are privacy requirements included in the contract?

Yes, appropriate Confidentiality Agreements will be completed and signed for contractors who work on the SIFG. Privacy and security requirements for contractors and service providers are mandated and are documented in relevant contracts.

4.6 How is assurance obtained that the information in the information system or project is used in accordance with the practices described in this PIA and, if applicable, the associated Privacy Act System of Records Notice?

Through the conduct, evaluation, and review of PIAs and SORNs, the FDIC monitors and audits privacy controls. Internal privacy policies are reviewed and updated as required. The FDIC Privacy Program implements a Privacy Continuous Monitoring (PCM) program in accordance with OMB Circular A-130.

4.7 Describe any privacy-related training (general or specific) that is provided to users of this information system or project.

Annual Security and Privacy Training is mandatory for all FDIC employees and contractors and they are required to electronically certify their acceptance of responsibilities for privacy requirements upon completion. Specified role-based privacy training sessions are planned and provided by the FDIC Privacy Program as well.

4.8 Describe how the FDIC develops, disseminates, and updates reports to the Office of Management and Budget (OMB), Congress, and other oversight bodies, as appropriate, to demonstrate accountability with specific statutory and regulatory privacy program mandates, and to senior management and other personnel with responsibility for monitoring privacy program progress and compliance.

The FDIC Privacy Program develops reports both for internal and external oversight bodies through several methods, including the Annual Senior Agency Official for Privacy Report (SAOP) as required by FISMA, and regular reporting to the SAOP, the CISO, and the Information Technology Risk Advisory Committee.

4.9 Explain how this information system or project protects privacy by automating privacy controls?

Privacy has been integrated within the FDIC Systems Development Life Cycle (SDLC), ensuring that stakeholders are aware of, understand, and address Privacy requirements throughout the SDLC, including the automation of privacy controls when possible. Additionally, FDIC has implemented technologies to track, respond, remediate, and report on breaches, as well as to track and manage PII inventory.

4.10 Explain how this information system or project maintains an accounting of disclosures held in each system of records under its control, including: (1) Date, nature, and purpose of each disclosure of a record; and (2) Name and address of the person or agency to which the disclosure was made?

The FDIC maintains an accurate accounting of disclosures of information held in each system of record under its control, in accordance with the Privacy Act of 1974 and 12

C.F.R. § 310. Disclosures are tracked and managed using the FDIC's FOIA solution.

4.11 Explain how the information system or project retains the accounting of disclosures for the life of the record or five years after the disclosure is made, whichever is longer?

The FDIC retains the accounting of disclosures as specified by the Privacy Act of 1974 and 12 C.F.R. § 310.

4.12 Explain how the information system or project makes the accounting of disclosures available to the person named in the record upon request?

The FDIC makes the accounting of disclosures available to the person named in the record upon request as specified by the Privacy Act of 1974 and 12 C.F.R. § 310.

Privacy Risk Analysis: Related to Accountability

Privacy Risk: There are no identifiable privacy risks related to accountability for SIFG.

Mitigation: No mitigation actions are recommended.

Section 5.0: Authority

Agencies should only create, collect, use, process, store, maintain, disseminate, or disclose PII if they have authority to do so, and should identify this authority in the appropriate notice.

5.1 Provide the legal authority that permits the creation, collection, use, processing, storage, maintenance, dissemination, disclosure and/or disposing of PII within the information system or project. For example, Section 9 of the Federal Deposit Insurance Act (12 U.S.C. 1819).

The FDIC ensures that collections of PII are legally authorized through the conduct and documentation of PIAs and the development and review of SORNs. FDIC Directive 1360.20, "Privacy Program," mandates that the collection of PII be in accordance with Federal laws and guidance. This particular system or project collects PII pursuant to the following laws and regulations:

- Federal Deposit Insurance Act (12 U.S.C. § 1819)

- Section 7 of Federal Deposit Insurance Conforming Amendments Act of 2005 (12 U.S.C. § 1817(b))

Privacy Risk Analysis: Related to Authority

Privacy Risk: There are no identifiable privacy risks related to authority for SIFG.

Mitigation: No mitigation actions are recommended.

Section 6.0: Minimization

Agencies should only create, collect, use, process, store, maintain, disseminate, or disclose PII that is directly relevant and necessary to accomplish a legally authorized purpose, and should only maintain PII for as long as is necessary to accomplish the purpose.

6.1 How does the information system or project ensure that it has identified the minimum PII that are relevant and necessary to accomplish the legally authorized purpose of collection?

The FDIC, or a third party acting on its behalf, collects contact information, opinions, and experiences directly from participants in the surveys, interviews, and focus groups; therefore, responses are dependent upon the accuracy of the information provided by each participant.

Additionally, through the conduct, evaluation, and review of privacy artifacts, [4] the FDIC ensures that the collection of PII is relevant and necessary to accomplish the legally authorized purpose for which it is collected.

6.2 How does the information system or project ensure limits on the collection and retention of PII to the minimum elements identified for the purposes described in the notice and for which the individual has provided consent?

Contact information gathered from FDIC databases for purposes of recruitment are verified by the original program that collected the information prior to its use in surveys, interviews, and focus groups. In cases in which the FDIC relies on a third-party

[4] Privacy artifacts include Privacy Threshold Analyses (PTA), Privacy Impact Assessments (PIA), and System of Record Notices (SORN).

vendor to recruit participants, all vendors used are trusted and vetted to ensure the FDIC only uses accurate information. Contact information used by a vendor is publicly available and assumed to be accurate. Participants are advised not to give any PII during the session or a survey's open text fields.

Additionally, through the conduct, evaluation, and review of privacy artifacts, the FDIC ensures that the collection of PII is relevant and necessary to accomplish the legally authorized purpose for which it is collected.

6.3 How often does the information system or project evaluate the PII contained in the information system or project to ensure that only PII identified in the notice is collected and retained, and that the PII continues to be necessary to accomplish the legally authorized purpose?

The FDIC maintains an inventory of systems that contain PII. The Privacy Program reviews information in the systems at the frequency defined in the FDIC Information Security Continuous Monitoring Strategy. New collections are evaluated to determine if they should be added to the inventory.

6.4 What are the retention periods of the data in this information system or project? What are the procedures for disposition of the data at the end of the retention period? Under what guidelines are the retention and disposition procedures determined? Explain.

The data collected by surveys, interviews, or focus groups are in accordance with the prevailing records retention schedule.

Procedures for disposition of the data at the end of the retention period are established in accordance with FDIC Records Schedules. For example, hard copies of any paper materials scanned into the system will be retained in accordance with FDIC Records Schedules or returned to the originating Division or Office for retention.

Additionally, records are retained in accordance with the FDIC Directive 1210.01 "Records and Information Management Program," which is informed by the Federal Records Act and NARA regulations Management Policy Manual and NARA-approved record retention schedule. Information related to the retention and disposition of data is captured and documented within the PIA process. The retention and disposition of records, including PII, is addressed in FDIC Directives 1210.01 and 1360.09 "Protecting Information."

6.5 What are the policies and procedures that minimize the use of PII for testing, training, and research? Does the information system or project implement

controls to protect PII used for testing, training, and research?

The FDIC has developed an enterprise test data strategy to reinforce the need to mask or use synthetic data in the lower environments whenever possible, and ensure all environments are secured appropriately based on the impact level of the information and the information system.

Privacy Risk Analysis: Related to Minimization

Privacy Risk: There is a risk that the FDIC will collect more information than necessary for purposes of future recruitment, correspondence, or for its reports and analyses

Mitigation: The risk is partially mitigated. The purpose of FDIC surveys, interviews, or focus groups is the collection of opinions and experiences of participants, not to collect PII. Although personal contact and demographic information is sometimes collected from participants, this information is aggregated or anonymized and does not identify individuals. Survey, interview, and focus group questions are reviewed in advance and approved by the FDIC Privacy Program. Participants are advised not to provide PII in a survey's open text fields and during interviews and focus groups sessions. The FDIC may also give participants the option to voluntarily provide limited contact information to facilitate future correspondence (e.g., informational pamphlets, email notifications), but participants are informed that they are not required to provide this information and their PII is generally not linked to the answers they provided during the surveys, interviews, and focus groups. If they choose to provide this information, the FDIC only uses it to support report analyses, follow-up, and future recruitment purposes.

Section 7.0: Data Quality and Integrity

Agencies should create, collect, use, process, store, maintain, disseminate, or disclose PII with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to ensure fairness to the individual.

7.1 Describe any administrative and technical controls that have been established to ensure and maximize the quality, utility, and objectivity of PII, including its accuracy, relevancy, timeliness, and completeness.

The FDIC has instituted procedural safeguards to ensure the confidentiality of survey takers is protected, including through the PTA process. Questions that are deemed unnecessary or too specific to an individual during surveys, interviews, and focus

groups are considered to be “over-collections” of information and are dropped from the questionnaire prior to distribution of the survey, interview, or focus group or additional steps must be taken to remove the identifying information. Additionally, programs must work with the FDIC Privacy Program to determine appropriate thresholds to ensure that individuals cannot be re-identified.

The FDIC reviews privacy artifacts for adequate controls to ensure the accuracy, relevance, timeliness, and completeness of PII in each instance of collection or creation.

7.2 Does the information system or project collect PII directly from the individual to the greatest extent practicable?

The SIFG collects PII directly from the individual. The SIFG also collects PII from third-party vendors. The FDIC reviews privacy artifacts to ensure each collection of PII is directly from the individual to the greatest extent practicable.

Personal information is collected directly from the participants either by FDIC or through contracted third parties, such as public opinion polling consultants. The FDIC may also extract contact information from FDIC systems to directly recruit potential participants for surveys, interviews, and focus groups. For recruitment of participants that are not in FDIC systems, the Privacy Act statement will inform individuals that their contact information may be used for future surveys, interviews, and focus groups.

In some instances, the FDIC may use publicly available or commercial sources to solicit participation in surveys, interviews, and focus groups. For example, the FDIC may contract with a firm to support direct and indirect recruitment activities, such as providing telephone numbers, ages, and other demographic data to supplement the recruiting sample. Neither the FDIC nor the contracted firm will incorporate contact information collected from commercial or publicly available sources into its surveys, interviews, or focus group files, or in the final reports and analyses that contain aggregated data from participants. The FDIC does not collect, maintain, or store any PII obtained through commercial data services used to recruit participants for surveys, interviews, and focus groups. When third-party commercial research companies are used to conduct surveys, interviews, or focus groups, the FDIC only receives anonymized data or aggregated summarized reports from these companies.

7.3 Describe any administrative and technical controls that have been established to detect and correct PII that is inaccurate or outdated.

The FDIC reviews privacy artifacts to ensure adequate controls to check for and

correct any inaccurate or outdated PII in its inventory.

7.4 Describe the guidelines ensuring and maximizing the quality, utility, objectivity, and integrity of disseminated information.

The FDIC's guidelines for the disclosure of information subject to Privacy Act protections are found in Part 310 of the FDIC Rules and Regulations.

7.5 Describe any administrative and technical controls that have been established to ensure and maximize the integrity of PII through security controls.

Through the PTA adjudication process, the FDIC Privacy Program uses the Federal Information Processing Standards Publication 199 (FIPS 199) methodology to determine the potential impact on the FDIC and individuals should there be a loss of confidentiality, integrity, or availability of the PII. The Office of the Chief Information Security Officer validates the configuration of administrative and technical controls for the system or project based on the FIPS 199 determination.

7.6 Does this information system or project necessitate the establishment of a Data Integrity Board to oversee a Computer Matching Agreements and ensure that such an agreement complies with the computer matching provisions of the Privacy Act?

The FDIC does not maintain any Computer Matching Agreements under the Privacy Act of 1974, as amended, by the Computer Matching and Privacy Protection Act of 1988. Consequently, the FDIC does not need to establish a Data Integrity Board.

Privacy Risk Analysis: Related to Data Quality and Integrity

Privacy Risk: There is a risk that the FDIC will collect more information than necessary for purposes of future recruitment, correspondence, or for its reports and analyses

Mitigation: The risk is partially mitigated. The purpose of FDIC surveys, interviews, and focus groups is the collection of opinions and experiences of participants, not to collect PII. Although personal contact and demographic information is sometimes collected from participants, this information is aggregated and does not identify individuals. Survey, interview, and focus group questions are reviewed in advance by the FDIC and approved by the FDIC Privacy Program. If the FDIC collects information about more than 10 members of the public, the questions are submitted to OMB for approval. The FDIC and OMB reviews ensure only information necessary for the purpose of the research is collected. The FDIC may also give participants the option to voluntarily provide limited contact information to

facilitate future correspondence (e.g., informational pamphlets, email notifications), but participants are informed that they are not required to provide this information and their PII is generally not linked to the answers they provided during the survey, interview, or focus group. If they choose to provide this information, the FDIC only uses it to support report analyses, follow-up, and future recruitment purposes.

Privacy Risk: There is a privacy risk that collecting certain types of information (e.g., demographic information) or collecting information in an open-ended manner may allow for re-identification of a participant if the sample size is small and a specific participant's response is unique.

Mitigation: This risk must be mitigated on a separate basis for each individual survey, interview, and focus group effort. The FDIC has instituted procedural safeguards to ensure the confidentiality of survey takers is protected, including through the PTA process. Questions that are deemed unnecessary or too specific to an individual during surveys, interviews, and focus groups are considered to be "over-collections" of information and are dropped from the questionnaire prior to distribution of the survey, interview, or focus group or additional steps must be taken to remove the identifying information. Additionally, programs must work with the FDIC Privacy Program to determine appropriate thresholds to ensure that individuals cannot be re-identified.

Section 8.0: Individual Participation

Agencies should involve the individual in the process of using PII and, to the extent practicable, seek individual consent for the creation, collection, use, processing, storage, maintenance, dissemination, or disclosure of PII. Agencies should also establish procedures to receive and address individuals' privacy-related complaints and inquiries.

8.1 Explain how the information system or project provides means, when feasible and appropriate, for individuals to authorize the collection, use, maintenance, and sharing of PII prior to its collection.

All of the FDIC's surveys, interviews, and focus groups are consensual. Participants are informed that their involvement is voluntary, and failure to provide any information will not impact their eligibility for, or provision of, FDIC services.

When information is collected directly from the individual, the FDIC Privacy Program ensures that Privacy Act (e)(3) statements and other privacy notices are provided, as necessary, to individuals prior to the collection of PII. This implied consent from individuals authorizes the collection of the information provided. Additionally, this PIA

and the SORN(s) listed in 2.2 serve as notice of the information collection. Lastly, the FDIC Privacy Program also reviews PIAs to ensure that PII collection is conducted with the consent of the individual to the greatest extent practicable.

8.2 Explain how the information system or project provides appropriate means for individuals to understand the consequences of decisions to approve or decline the authorization of the collection, use, dissemination, and retention of PII.

When the FDIC collects information directly from individuals, it describes in the Privacy Act Statement and other privacy notices the choices available to the individual and obtains implicit or explicit consent with respect to the collection, use, and disclosure of PII.

8.3 Explain how the information system or project obtains consent, when feasible and appropriate, from individuals prior to any new uses or disclosure of previously collected PII.

It is not feasible or appropriate to get direct consent prior to any new use or disclosures of previously collected PII. If applicable, the FDIC Privacy Program will update the relevant SORN(s) as well as the relevant PIA.

8.4 Explain how the information system or project ensures that individuals are aware of and, when feasible, consent to all uses of PII not initially described in the public notice that was in effect at the time the FDIC collected the PII.

The project or system only uses PII for the purposes listed in Section 9.1. This PIA and the SORN(s) listed in 2.2 serve as notice for all uses of the PII. Additionally, the FDIC ensures that individuals are aware of all uses of PII not initially described in the public notice, at the time of collection, in accordance with the Privacy Act of 1974 and the FDIC Privacy Policy.

8.5 Describe the process for receiving and responding to complaints, concerns, or questions from individuals about the organizational privacy practices?

The FDIC Privacy Program website, http://www.fdic.gov/privacy/, instructs individuals to direct privacy questions to the FDIC Privacy Program through the Privacy@fdic.gov email address. Complaints and questions are handled on a case-by-case basis.

Privacy Risk Analysis: Related to Individual Participation

Privacy Risk: There is a risk that participants may not realize that the information they initially provide to the FDIC (e.g., to seek a benefit) may later be used to contact participants to engage in future surveys, interviews, and focus groups.

Mitigation: This risk is partially mitigated by publishing this PIA and the FDIC-040, Mailing, Event, and other Contact Lists SORN, which states that mailing lists may be maintained of persons who attend or have an interest in FDIC programs to be used in furtherance of the FDIC's mission. The FDIC gives all potential participants the opportunity to decline or to discontinue participation at any point, minimizing any potential harm resulting from an individual's lack of notice.

Section 9.0: Purpose and Use Limitation

Agencies should provide notice of the specific purpose for which PII is collected and should only use, process, store, maintain, disseminate, or disclose PII for a purpose that is explained in the notice and is compatible with the purpose for which the PII was collected, or that is otherwise legally authorized.

9.1 Describe the purpose(s) for which PII is collected, used, maintained, and shared as specified in the relevant privacy notices.

The FDIC mission necessitates that the Corporation interact with and provide services to a large population of individuals. The FDIC must always endeavor to improve its operations and the outcomes for individuals with whom it interacts. FDIC survey, interview, and focus group efforts are developed to better understand the opinions and experiences from the FDIC stakeholders and the public. By analyzing large datasets of information regarding interactions with its operations, the FDIC can focus funding and effort to improving perceived shortcomings or predictable shortfalls in operations. The FDIC uses information gathered from surveys, interviews, and focus groups to improve research, customer service, and stakeholder relationships.

9.2 Describe how the information system or project uses PII internally only for the authorized purpose(s) identified in the Privacy Act and/or in public notices? Who is responsible for assuring proper use of data in the information system or project and, if applicable, for determining what data can be shared with other parties and information systems? Have policies and procedures been established for this responsibility and accountability? Explain.

Through the conduct, evaluation, and review of privacy artifacts, and in conjunction with the implementation of applicable privacy controls, the FDIC ensures that PII is

only used for authorized uses internally in accordance with the Privacy Act and FDIC Directive 1360.09 "Protecting Information." Additionally, annual Information Security and Privacy Awareness Training is mandatory for all employees and contractors, which includes information on rules and regulations regarding the sharing of PII with third parties.

The FDIC ensures that the practices stated in this PIA are followed by leveraging training, standard operating procedures, policies, rules of behavior, and role-based access. Only employees and contractors with a valid need-to-know may collect and use information obtained from surveys, interviews, and focus groups. Moreover, any FDIC division or office that chooses to collect information is required to conduct a PTA. The FDIC Privacy Program tracks and accounts for all surveys, interviews, and focus groups efforts by the Corporation through the PTA process.

When contractors have access to PII, contractors are required to take mandatory annual Information Security and Privacy Awareness Training. Privacy and security-related responsibilities are specified in contracts and associated Risk Level Designation documents. Privacy-related roles, responsibilities, and access requirements are documented in relevant PIAs.

9.3 How is access to the data determined and by whom? Explain the criteria, procedures, security requirements, controls, and responsibilities for granting access.

All access is granted on a need-to-know basis. FDIC Guidelines established in the Corporation's Access Control Policies and Procedures document are also followed. Controls are documented in the system documentation and a user's access is tracked in the Corporation's access control tracking system.

9.4 Do other internal information systems receive data or have access to the data in the information system? If yes, explain.

☐ No
☒ Yes Explain.

Information from surveys, interviews, and focus groups may be shared with internal stakeholders inasmuch as those stakeholders are involved in distributing information or collaborating with FDIC partners. Audio clips may be shared externally to enhance presentations of survey, interview, and focus group results with the consent of participants. Nonetheless, information from surveys, interviews, and focus groups is not shared for any purpose beyond which it was originally collected, i.e. contact information given by individuals for purpose x will not be shared for use of purpose at

a later date.

9.5 Will the information system or project aggregate or consolidate data in order to make determinations or derive new data about individuals? If so, what controls are in place to protect the newly derived data from unauthorized access or use?

Yes, FDIC statistical or research experts aggregate and anonymize demographic data collected from participants to identify trends among groups and not individuals within those groups. The aggregated data is then analyzed, trends are documented, and recommendations may be made. A report may be distributed to appropriate FDIC stakeholders and the general public. There is no PII included in the published reports-only aggregated data is distributed in the published reports.

9.6 Does the information system or project share PII externally? If so, is the sharing pursuant to a Memorandum of Understanding, Memorandum of Agreement, or similar agreement that specifically describes the PII covered and enumerates the purposes for which the PII may be used? Please explain.

The FDIC may share reports containing aggregated information with external agencies, Congress, or the public. These reports are distributed for both business-related and informational purposes. All information regarding persons in these reports is aggregated, so individuals are not identified.

The FDIC shares limited contact information with third-party contractors and vendors to assist the FDIC in recruiting for, and conducting, surveys, interviews, and focus groups. This sharing is compatible with "Routine Use 6" of the FDIC-040, Mailing, Event, and other Contact Lists SORN, and similar routine uses found in FDIC source systems. This routine use permits the disclosure of PII to FDIC contractors when necessary to accomplish an agency function. Contractors and vendors provided PII under "Routine Use 6" are subject to the same Privacy Act limitations on disclosures as FDIC employees. The reports issued following surveys, interviews, and focus groups contains only aggregated information (no PII), so SORN compatibility is not needed for such disclosures.

Additionally, through the conduct, evaluation, and review of PIAs and SORNs, the FDIC ensures that PII shared with third parties is used only for the authorized purposes identified or for a purpose compatible with those purposes, in accordance with the Privacy Act of 1974 and FDIC Directive 1360.20 "Privacy Program." The FDIC also ensures that agreements regarding the sharing of PII with third parties specifically describe the PII covered and specifically enumerate the purposes for which the PII may be used, in accordance with FDIC Directive 1360.09.

9.7 Describe how the information system or project monitors, audits, and trains its staff on the authorized sharing of PII with third parties and on the consequences of unauthorized use or sharing of PII.

Annual Information Security and Privacy Awareness Training is mandatory for all employees and contractors, which includes information on rules and regulations regarding the sharing of PII with third parties.

9.8 Explain how the information system or project evaluates any proposed new instances of sharing PII with third parties to assess whether the sharing is authorized and whether additional or new public notice is required.

The FDIC reviews privacy artifacts to evaluate any proposed new instances of sharing PII with third parties to assess whether the sharing is authorized and whether additional or new public notice is required.

Privacy Risk Analysis: Related to Use Limitation

Privacy Risk: There is a risk that third-party vendors or contractors could use participant PII for purposes other than facilitating a survey, interview, or focus group.

Mitigation: This risk is partially mitigated. The FDIC requires all third-party vendors to comply with applicable FDIC privacy policies and the provisions of the Privacy Act. Third-party vendors are required to delete or destroy any data collected from FDIC or survey, interview, and focus group participants at the end of its contract. FDIC divisions and offices ensure that all PII handling and storage processes comply with FDIC Privacy standards through PTAs and contract review. The FDIC Privacy Program must provide prior approval of a third party vendor's privacy policies prior to beginning to work.

Privacy Risk: There is a risk of unauthorized disclosure of information.

Mitigation: This risk is partially mitigated. Access to survey, interview, and focus group responses in the relevant system is limited to those FDIC employees with a need to know this information to perform their duties. The FDIC Privacy Program ensures that any question asked during surveys, interview, and focus groups would not result in answers that could be linkable to an individual participant prior to distribution of the survey, or the conduct of an interview or focus group. If the FDIC chooses to distribute a report externally, the reports contain only aggregate data or anonymized data that demonstrates a trend or pattern and is analyzed by FDIC outreach or research units prior to disclosure to ensure the information cannot be used to identify an individual.

Privacy Risk: There is a risk that the FDIC could use the information collected for purposes other than that for which the information was collected, including for operational uses.

Mitigation: The FDIC only collects information that is directly related to the survey, interview, or focus group. All recruitment of participants for surveys, interviews, and focus groups is conducted only by FDIC outreach units, research units, or third-party vendors, and not by those responsible for management, benefits, services, or enforcement decisions within the Corporation. All PII collected is destroyed once it is aggregated into the reports and any contact information collected for the purpose of future correspondence is separated from the answers provided by each participant. Information collected during the survey, interview, or focus group resides within the FDIC division or office statistical or research unit or contractor that is responsible for producing statistical and demographic analysis. Furthermore, all FDIC employees and contractors are required to take annual privacy training and are subject to discipline for inappropriately using PII.

Section 10.0: Security

Agencies should establish administrative, technical, and physical safeguards to protect PII commensurate with the risk and magnitude of the harm that would result from its unauthorized access, use, modification, loss, destruction, dissemination, or disclosure.

10.1 Describe the process that establishes, maintains, and updates an inventory that contains a listing of all information systems or projects identified as collecting, using, maintaining, or sharing PII.

The FDIC Privacy Program maintains an inventory of all programs and information systems identified as collecting, using, maintaining, or sharing PII.

10.2 Describe the process that provides each update of the PII inventory to the CIO or information security official to support the establishment of information security requirements for all new or modified information systems or projects containing PII?

The FDIC Privacy Program updates the CISO on PII holdings via the PTA adjudication process. As part of the PTA adjudication process, the FDIC Privacy Program reviews the system or project's FIPS 199 determination. The FDIC Privacy Program will recommend the appropriate determination to the CISO should the potential loss of confidentiality be expected to cause a serious adverse effect on individuals.

10.3 Has a Privacy Incident Response Plan been developed and implemented?

FDIC has developed and implemented a Breach Response Plan in accordance with OMB M-17-12.

10.4 How does the agency provide an organized and effective response to privacy incidents in accordance with the organizational Privacy Incident Response Plan?

Responses to privacy breaches are addressed in an organized and effective manner in accordance with the FDIC's Breach Response Plan.

Privacy Risk Analysis: Related to Security

Privacy Risk: There are no identifiable privacy risks related to security for SIFG projects.

Mitigation: No mitigation actions are recommended.