

PRIVACY IMPACT ASSESSMENT

Advanced Legal Information System (ALIS)

February 2012

FDIC Internal System

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System Overview

The Advanced Legal Information System (ALIS) is the FDIC Legal Division's principal information system and contains all types of information related to the Division's business functions. This includes records of matters, people, organizations, events, narratives, invoices, and budgets. The system is an externally hosted web-based application that integrates the Legal Division's matter management, budgeting, and invoice processing into a single application. ALIS has search and reporting capabilities and is used to process invoice data; however, it does not produce or process payments.

ALIS contains data that may be considered sensitive. While ALIS does not require the collection or maintenance of Social Security Numbers (SSNs), they can be entered by the user into a text field and used by a sole proprietor as a Tax Identification Number (TIN). The primary types of information collected and maintained within ALIS include existing and closed bank data, subsidiary data, invoice information, vendor data, and legal employee and time-keeping information.

Personally Identifiable Information (PII) in ALIS

ALIS contains the names of individuals, including FDIC employees and contractors, as well as business TINs associated with official Corporate legal matters. Tax Identification Numbers for vendors that provide services to the FDIC are collected and retained in ALIS as well. In cases where the vendor is a sole proprietor, the TIN could also be the individual's personal SSN.

ALIS also contains information related to labor and FDIC employee disciplinary matters. Various text fields within ALIS can be populated by the user and may potentially contain sensitive business information and/or sensitive personally identifiable information.

Purpose & Use of Information in ALIS

Data contained within ALIS is necessary for the purposes of sustaining the FDIC Legal Division's business functions; this includes maintaining records of matters, people, organizations, events, narratives, invoices, and budgets.

Sources of Information in ALIS

Matters within ALIS are initially set up by Legal Division employees and may be the result of referrals received from other divisions through a request for legal services. Once a matter is initiated within ALIS, information is collected by ALIS, or provided to ALIS via any of the following channels:

- Legal Division employees
- Corporate Human Resources Information System (CHRIS) – Legal Division employee data
- Corporate Human Resources Information System Time and Attendance (CHRIS T&A) – Time and attendance data related to matters within ALIS

- Structure Information Management System (SIMS) – Open financial institution data
- Communication, Capability, Challenge and Control (4C) – Subsidiary and asset information
- Outside Counsel – FDIC contracts with external law firms and receives budget proposals, electronic invoices, and Legal Services Agreement (LSA) information for inclusion in ALIS.
- New Financial Environment (NFE) – Vendor and closed bank information is exchanged with NFE, along with payment information, contract invoice, Receivership, and Accounting entity.

In addition, outside counsel firms may submit budget proposals, electronic invoices and Legal Services Agreement (LSA) information into ALIS via its Collaboration Portal.

Notice & Consent

Individuals do not have the opportunity to decline to provide personal information or consent to particular uses of the data in regards to ALIS. Additionally, individuals do not have the ability to opt-out of providing their information. Data is not collected directly from individuals for inclusion in ALIS. All data is received from other sources and is related to official business matters.

Access to Data in ALIS

FDIC employees must have the approval of their respective Supervisor, as well as the Program Manager/System Owner before access is granted to ALIS. Access is recertified by the employee's Supervisor/Manager on an annual basis. In addition, ALIS has defined business roles for each user, which limits the user's access to specific functions and information, on a need to know basis.

The majority of FDIC ALIS users have 'read' or 'read/write' privileges, while a few users have 'delete' privileges. Administrator or security privileges are provided to a limited number of ALIS users.

While most information within ALIS is currently available to those FDIC employees that have been setup as ALIS users, some information is restricted to specific individuals or roles, such as information associated with the Labor and Employment group. Only FDIC employees assigned to specific roles have read or write access to the restricted information. Additionally, matters marked 'private' by a user are only accessible to the FDIC employees assigned to that matter.

Data Sharing

Other Systems that Share or Have Access to Data in the System:

System Name	System Description	Type of Information Processed
Corporate Human Resources Information System (CHRIS)	CHRIS supports the FDIC's human resources functions.	Personnel records
CHRIS Time and Attendance (CHRIS T&A)	CHRIS T&A provides accurate reporting of time and attendance data for FDIC employees. A bi-directional interface exists between CHRIS T&A and ALIS.	Matter and employee timesheet tracking data
Virtual Supervisory Information On the Net (ViSION)		Enforcement data
Structure Information Management System (SIMS)	Open bank information is pulled from SIMS.	Open financial institution data
Communication, Capability, Challenge and Control (4C)	Subsidiary and asset information is pulled from 4C.	Financial institution subsidiary information
New Financial Environment (NFE)	A bi-directional flow exists with NFE that supports vendor and closed financial institution information as well as payment information.	Vendor and closed bank information and payment information

Data Accuracy in ALIS

Technical controls within ALIS ensure that required data is collected before a record can be saved.

Data Security for ALIS

ALIS requires the user to be an active user of the FDIC network, since the software uses the Windows Active Directory (AD) login credentials. Aside from an AD login, users must be members of a specific network group for ALIS users, hold software licenses and be entered as users in the application database and have assigned roles within FDIC legal sections (which confer privileges).

The Corporation's Identity Access Management System (IAMS) is used to facilitate the tracking and management of FDIC employees that are ALIS users. IAMS requests must be submitted by users and approved by managers in order to gain access to ALIS. User access is further controlled and restricted according to the groups specified above and in the response to Question E.I.

System of Records Notice (SORN)

ALIS does not operate as a Privacy Act system of records. The ALIS system processes information imported from other FDIC record systems; the information is

collected and maintained for purposes related to other business processes for which Privacy Act systems of records already exist. These record systems are covered by the following SORNs: Financial Institution Investigative and Enforcement Records (30-64-0002), Insured Financial Institution Liquidation Records (30-64-0013), and Personnel Records (30-64-0015).

Contact Us

To learn more about the FDIC's Privacy Program, please visit:
<http://www.fdic.gov/about/privacy/>.

If you have a privacy-related question or request, email Privacy@fdic.gov or one of the [FDIC Privacy Program Contacts](#). You may also mail your privacy question or request to the FDIC Privacy Program at the following address: 3501 Fairfax Drive, Arlington, VA 22226.

