

PRIVACY IMPACT ASSESSMENT

Background Investigation Database System (BIDS)

July 2009

FDIC Internal System

Table of Contents

[System Overview](#)

[Personally Identifiable Information \(PII\) in BIDS](#)

[Purpose & Use of Information in BIDS](#)

[Sources of Information in BIDS](#)

[Notice & Consent](#)

[Access to Data in BIDS](#)

[Data Sharing](#)

[Data Accuracy in BIDS](#)

[Data Security for BIDS](#)

[System of Records Notice \(SORN\)](#)

[Contact Us](#)

System Overview

The FDIC Division of Risk Management Supervision (RMS) utilizes the Background Investigation Database System to track and manage Background Investigation (BI) data requests (i.e., name checks, fingerprint checks, and financial history checks) for investigations of potential bank directors, officers, and principals. BIDS is maintained in a secure network environment that can be accessed by authorized RMS personnel and includes the following critical features:

- Data is accessible nationwide within the FDIC (at Regional Offices and at Headquarters)
- Data is stored in a secure database environment
- Each individual applicant's BI case is tracked through the entire lifecycle of the case
- BI Request documents are automatically generated in Portable Document Format (PDF)
- Notifications to specific users are automated at key event points
- Legacy (converted) BI data is present in the system
- Capability to generate various management reports (monthly, quarterly, annually)

BIDS is comprised of a secure web front-end to capture and manage BI case data. The front-end interfaces with a robust database system and allows for the ability to track BIDS application activities and also provide audit capabilities.

Personally Identifiable Information (PII) in BIDS

BIDS contains all of the personal information required for a Background Investigation involving a bank director or officer, including the following: full name, maiden/alias name, Social Security Number (SSN), Passport Number, date of birth (DOB), home address, business address, mother's maiden name, father's name, educational records, employment status/records, investigative reports/data, and date/place of prior convictions (if any).

Purpose & Use of Information in BIDS

The data collected and maintained in BIDS is relevant and necessary for the purpose of conducting full and comprehensive Background Investigations for these individuals. All PII requested is required and necessary for this purpose. In addition, this information must be shared with other government agencies in order to complete aspects of the background investigation.

Sources of Information in BIDS

Personally identifiable information (PII) collected for inclusion into BIDS is provided directly by the individual undergoing the Background Investigation. The individual may provide his/her personal information when he/she completes and submits to FDIC an Interagency Biographical and Financial Report (OMB No. 3064-0006) or provides the information in a prepared and submitted packet to FDIC using OMB Form No. 3064-0006 as a guideline. Once FDIC has received the information from

the individual, it is entered into BIDS by an authorized BIDS user. If information is missing, the FDIC Case Manager may contact the individual to obtain the information. Additionally, BIDS users may add data for tracking the requests, as well as the results of each process BI (fingerprint, name checks, or FDIC Division of Administration Library Requests, credit checks). Upon receipt of the information from the agencies providing BI information, the Case Manager enters the appropriate notation into the freeform text field on the relevant "Edit BI Status" screen within BIDS.

BIDS also receives data input from the FDIC Division of Administration (DOA) Library, where different types of Background Investigations are requested using BIDS. BIDS automatically generates pre-filled Information Request Forms by the FDIC DOA Library Staff. Additionally, an email is generated by BIDS to a controlled-access mailbox containing a link to the Information Request Form(s). A Library Staff member is responsible for logging into BIDS, viewing and processing the Information Request Form(s) and returning the associated BI information in a secure manner (such as encrypted email), to the BIDS Case Manager. To facilitate these requests, the following FDIC forms are generated and used by BIDS: Consumer Credit Report Request (Form 3020/03B), Dun & Bradstreet and TRW Business Profiles Request (Form 3020/10A), and Library Publications Order Form (Form 3020/11). BIDS is also used to request credit checks on business associated with individuals undergoing a BI. Although the requests described are originated and tracked within the system, BIDS does not store any of the data collected via these checks.

External agencies that may provide information for use in BIDS may include the Drug Enforcement Administration (DEA), The Federal Bureau of Investigation (FBI), the Immigration and Customs Enforcement (ICE) Agency, the Central Intelligence Agency (CIA), and Interpol.¹ These agencies provide name check results for each individual undergoing the BI. The FBI also processes fingerprint checks for the FDIC. The results of the name checks are recorded in BIDS. The information obtained from conducting the name checks and fingerprint checks are used to evaluate the suitability of potential bank directors, officers, or principals.

Notice & Consent

Individuals cannot "opt out" of providing their personal information or consent to only particular uses. All PII requested is required and necessary to conduct a full comprehensive background investigation. In addition, this information must be shared with other government agencies in order to complete aspects of the background check, which are done solely within those specific agencies (i.e., Federal Bureau of Investigation fingerprint checks). In the event that an individual refuses to provide the requested information necessary for conducting a background check, approval will be denied to that individual, barring him/her from assuming any bank director or officer positions.

¹ The International Criminal Police Organization (Interpol) is an intergovernmental organization that facilitates international police cooperation.

Access to Data in BIDS

All access to the system is granted on a “need to know” basis. Approved BIDS users include authorized FDIC staff that require access to the system as part of their daily job duties for the purpose of completing assigned tasks associated with conducting Background Investigations. Access to BIDS is facilitated, tracked, and managed using the FDIC’s Identity Access Management System (IAMS).

Data Sharing

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

System Name	System Description	Type of Information Processed
Structure Information Management System (SIMS)	This system maintains current and historical non-financial data for all institutions. BIDS pulls data from SIMS (lists of countries and states) to verify BI information.	Lists of countries and states
Corporate Reference Database (CRD)	BIDS pulls data from CRD regarding mailing addresses and phone numbers of FDIC Supervisory Areas.	Mailing address and phone number
Format and Information Action Tracking (FIAT) Database (part of ViSION)	BIDS queries the FIAT database, which is part of the Virtual Supervisory Information On the Net (ViSION) system and pulls records for people matching a BIDS individual’s first name and last name.	BIDS Record ID and address
Active Directory (AD)	BIDS relies on the Active Directory to authenticate a user’s login and password upon a login request. Additionally, BIDS uses AD to pull the list of approvers and Case Managers from the BIDS AD Groups. For each of these users, BIDS retrieves the full name, office phone number, and email address.	Full Name, office phone number, email address

Data Accuracy in BIDS

Data is checked for completeness by visual inspection by authorized BIDS users. Data is then manually entered into BIDS by authorized users. BIDS alerts the user if certain required information is missing.

Data Security for BIDS

In accordance with Office of Management and Budget (OMB) Circulars A-123 and A-130, Appendix III, the BIDS system has controls in place to prevent the misuse of data by those who have access to the data. Such security measures and controls consist of: passwords, user identification, IP addresses, database permissions, and access controls. In addition to user names and password requirements, BIDS includes programming logic to record the user’s ID and access time(s) when BI case data is accessed, created, and/or updated. Additionally, BIDS users are required to complete the FDIC’s Corporate Information Security Awareness Training and Privacy Act Awareness Orientation on an annual basis. All users of BIDS are Corporation

employees and are required to comply with Corporate and BIDS procedures related to information security and privacy.

System of Records Notice (SORN)

BIDS operates under the FDIC Privacy Act SORN 30-64-0002: *Financial Institution Investigative and Enforcement Records*.

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.

