

# PRIVACY IMPACT ASSESSMENT

## Customer Communication and Tracking System (CCATS)

December 2012

FDIC Internal System

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## System Overview

In the course of fulfilling its mission, the FDIC receives, responds to, tracks, and reports on a wide range of complaints regarding financial institutions, as well as requests and inquiries from the public and banking industry. Within FDIC, the Division of Depositor and Consumer Protection (DCP), Division of Administration (DOA), and Division of Insurance Research (DIR) are responsible for processing such complaints, requests, and inquiries. To do so, it is necessary for these divisions to track all written correspondence and telephone calls with the public and banking industry and meet related reporting needs.

Previously, DOA and DIR used the Customer Inquiry System (CusIS) and DCP used the Specialized Tracking and Reporting System (STARS) to track such complaints, requests, and inquiries. These two disparate systems relied on obsolete technology, making for a challenging and time-consuming process to provide accurate, consolidated, and coherent information and reporting about FDIC's communications with the public and bankers. For example, a significant percentage of the calls to the DOA call center were transferred to DCP for resolution. These calls were entered into both CusIS and STARS and made it difficult to track all calls to final resolution.

To remedy this process as well as improve response time and customer service, the FDIC has developed the Customer Communication and Tracking System (CCATS). CCATS is an enterprise-wide system for tracking communications to the FDIC received via email, mail, fax, the DOA Call Center, and the official FDIC website ([www.fdic.gov](http://www.fdic.gov)). In the Phase 1 Release, CCATS replaced the previous CusIS service for DOA and DIR and the STARS application for DCP; in a future Phase 2 Release, CCATS will also support the remaining FDIC Divisions and Offices. This PIA addresses the initial Phase 1 Release of CCATS and will be updated at the appropriate time to reflect future development efforts involving DCP and other FDIC divisions and offices.

## Personally Identifiable Information (PII) in CCATS

CCATS will contain personally identifiable information (PII) and non-PII from members of the public and banking industry such as: requestor/customer Type (i.e., academic, banker, consumer), name, email address, home address, title or position, organization, work phone, fax, home phone, case number, and inquiry type.

Sensitive PII is not required by DOA or DIR to process an incoming complaint, request, or inquiry. Therefore, the CCATS database does not contain any fixed fields to record sensitive PII elements, such as Social Security Numbers (SSNs), personal bank account or financial information, or date of birth. However, this information can occasionally be included within the correspondence sent by an individual. In this case, DOA or DIR staff scans and upload the attachment to the individual's case record in CCATS.

## Purpose & Use of Information in CCATS

The data in CCATS is both relevant and necessary for the purpose for which the system was designed, namely to support the FDIC's mission and legal requirement to

receive, respond to, track, and report on complaints, request and inquiries from the public and banking industry. Customers are not required to provide their personal information unless they request a written response from the FDIC.

## Sources of Information in CCATS

Information in CCATS is derived from a wide range of sources, including:

- **Members of the Public and Bankers:** Complaint, request, and inquiry information that are stored in CCATS are collected from members of the public and banking industry. The information in CCATS is collected in a variety of ways, including phone calls to the DOA Central Call Center, mail, email, fax, and an online "Questions, Suggestions and Request" form found on [www.fdic.gov](http://www.fdic.gov). If the inquiry comes into CCATS via the online web form, CCATS automatically routes the case to the appropriate DOA or DIR function area.
- **DOA Public Information and Call Center Staff:** DOA staff and contractors are also sources of information for CCATS. For example, when a telephone call comes into the Central Call Center via the Corporation's 1-800 number, CCATS automatically creates a record that is pre-populated with a case number, date of call, and the caller's telephone number. The call is then routed by CCATS to a DOA Central Call Center Agent, who asks the caller for certain information (i.e., name, email, address, customer type, inquiry type) and populates the record in CCATS. The agent uses CCATS to route the case to the appropriate FDIC subject matter expert (SME) for response.
- **FDIC Employees and Analysts:** These individuals are located in various FDIC Divisions and serve as the SMEs responsible for reviewing and responding to the inquiry. As such, they may input information about the resolution of the issue into an individual case record as well as the following information, as necessary: name, email, address, customer type, and inquiry type.

## Notice & Consent

Individuals are able to "opt out" of providing their information for inclusion in CCATS. Customers initiate contact with FDIC by submitting suggestions, inquiries, requests, or complaints regarding financial institutions. At any point during this process, the customer can choose to remain anonymous and opt-out of providing any PII. However, in order to receive a written response from the FDIC, the individual must provide the necessary PII, so that the FDIC may mail or email them a response.

## Access to Data in CCATS

Authorized FDIC employees in DIR, DOA, and other Divisions and Offices are granted access to the CCATS data, in order to respond to an inquiry or manage the system. This includes users, managers, and system administrators. DOA Central Call Centre Contractors also have restricted access to data, in order to receive, respond, and route inquiries to the appropriate FDIC Division or Office for response.

Access to the CCATS data is determined by the data owner in DOA or DIR. Only FDIC employees and contractors with a “need to know” are granted access to case records, in order to process the complaint, request, or inquiry in a timely manner.

## Data Sharing

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

System Name	System Description	Type of Information Processed
<b>Avaya</b>	Computer-telephone integration, in support of the Call Center operations.	Customer-provided data (may or may not be PII)
<b>FDIC Structure Information Management System (SIMS)</b>	SIMS retrieves necessary bank structure data, such as classification and ownership. No PII is contained in this system.	Bank structure data
<b>Call Report Data</b>	Retrieves financial institution total asset data. No PII is contained in this system.	Financial institution total asset data
<b>FDIC.gov</b>	Customers submit inquiries, complaints, and suggestions via an online form that feeds directly and securely into CCATS.	Customer-provided data (may or may not be PII)

## Data Accuracy in CCATS

Data collected by CCATS on a web form protects against cross-site scripting and malicious code injections. The FDIC Division of Information Technology (DIT) Information Security team has conducted an assessment of the web form to ensure that data collected is accurate and protected.

Data in CCATS is collected from individual members of the public and bankers via phone calls, emails, faxes, and online forms. These individuals are responsible for the accuracy of the information provided. Also, CCATS contains software to ensure that each case record is populated with the correct formatted information provided by the individual.

## Data Security for CCATS

CCATS is operated at one site by a third-party vendor, using their secure web-based platform. The vendor has specific physical and logical controls in accordance with FDIC’s stringent security and privacy requirements. Access to the system is limited only to authorized users on a “need to know” basis; users must take mandatory FDIC Security and Privacy Awareness Training and abide by system-specific rules of behavior. The vendor must abide by stringent FDIC security and privacy requirements.

## System of Records Notice (SORN)

The current Phase 1 Release of CCATS does not operate as a Privacy Act System of Records (SOR).

## 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](mailto: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.

