

PRIVACY IMPACT ASSESSMENT

Ombudsman Automated Tracking System (CTSOATS)

October 2011

FDIC Internal System

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System Overview

The FDIC Office of the Ombudsman (OO) is an independent and neutral resource and liaison for the banking industry and general public to help resolve problems and complaints against the FDIC. The OO does not act as an advocate for either side but rather promotes fair processes and fair administration. The Ombudsman Automated Tracking System (CTSOATS) is used by the Office of the Ombudsman (OO) to track inquiries, correspondence, and complaints against the FDIC from the financial industry, the public, and current and former FDIC employees.

Additional supplementary functions have been added in support of the Internal Ombudsman to the Chairman in their specific handling of complaints from FDIC employees against other employees and the FDIC. The internal complaints are tracked for a year-end report provided to the FDIC Chairman.

Personally Identifiable Information (PII) in CTSOATS

CTSOATS does not retain personally identifiable information (PII). The majority of the data entered into the CTSOATS application is done via data input from phone calls; no PII is collected via this method. The second method of data collection is via an online FDIC Comment Form located on www.fdic.gov and no PII is officially collected in the structured data fields; however, there is a comment field that allows free input. Any PII data entered into the FDIC Comment Form is removed by the OO CTSOATS administrators and is not retained in the application or database.

Purpose & Use of Information in CTSOATS

The information maintained in CTSOATS is both relevant and necessary for the purpose for which the system was designed, namely to track inquiries, correspondence, and complaints.

CTSOATS does not collect any PII, nor are any personal identifiers assigned to the cases in the system. Data retrieval is based on comment/comment type and not by a personal identifier.

Sources of Information in CTSOATS

CTSOATS imports financial institution information from the FDIC Structure Information Management System (SIMS) application. Specific inquiry and complaint information is received via phone calls from bankers, the public, and current and former FDIC employees; PII is not collected from any parties over the phone. Information is also collected via the FDIC Comment Form located on the FDIC website (www.fdic.gov).

Notice & Consent

Individuals are not requested nor required to provide PII data into the CTSOATS application. The information maintained in CTSOATS is retrieved by comment/comment type and not by a personal identifier.

Access to Data in CTSOATS

Only authorized Office of the Ombudsman employees and CTSOATS Administrators has access to the data in CTSOATS. All authorized users must have clearance to access the data; however, only CTSOATS administrators can edit and delete cases entered by the OO staff. All system access requests are controlled through 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
FDIC Structure Information Management System (SIMS)	SIMS retrieves necessary bank structure data, such as classification and ownership. No PII is contained in this system.	Bank structure data

Data Accuracy in CTSOATS

All data is entered by the OO with the exception of comments collected via the FDIC Comment Form located on the FDIC.gov website. The comments data is imported into CTSOATS, where the OO staff adds all other required data such as the proper issue group, keyword (if any), division, additional comments, and case resolution. The OO staff reviews the data in the CTSOATS application on a routine, monthly basis.

Data Security for CTSOATS

FDIC uses the Identity Access Management System (IAMS) security application to support access requests. IAMS requests must be submitted by users and approved by managers in order to gain access to CTSOATS. Further, access to CTSOATS is controlled through role-based filtering.

Following FDIC's IAMS clearance for access rights, authorized staff must sign the OO Confidentiality Agreement to be granted access to CTSOATS.

CTSOATS Administrators restrict OO staff from removing or deleting data in the system and eradicate PII during a monthly scrub.

System of Records Notice (SORN)

The CTSOATS application does not operate under a FDIC Privacy Act SORN because it does not retain any PII data.

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.

