

PRIVACY IMPACT ASSESSMENT

Comment Review for Interagency Statutory (CRISP)

June 2014

FDIC External Services

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System Overview

The FDIC utilizes Comment Review for Interagency Statutory Proposals (CRISP), a web-based application, to facilitate the collection, organization, and review of comments received from members of the public on Notices of Proposed Rulemaking (NPRs) or other proposals published by the FDIC for public review. CRISP imports comments submitted via email or through FDIC's website. In addition, authorized staff may scan and upload to the system comments received in hardcopy. The system stores the comments in a secure database that is accessible to authorized FDIC staff. Staff review and analyze submissions and redact home contact information or other PII prior to the placement of the comments on the FDIC.gov website.

CRISP significantly reduces time and costs associated with manually processing and reviewing large volumes of comments. In addition, CRISP enhances the FDIC's ability to work collaboratively with other agencies regarding the organization and review of comments, and to produce meaningful trending information for the purposes of facilitating the proposal comment process.

Personally Identifiable Information (PII) in CRISP

Comments received and stored in CRISP may include personal information pertaining to members of the public, such as the commenter's full name and contact information (e.g., home address, email addresses and/or telephone number). Additionally, commenters may attach or provide information they believe is relevant to the proceeding, and this could potentially include any manner of PII or sensitive PII.

Purpose & Use of Information in CRISP

Comments received from members of the public on proposals published by the FDIC for public review are a key source of information for FDIC's rulemaking process. All comments and proposed alternatives received during the specified comment period are carefully considered prior to the FDIC's formal issuance of a final rule or statement of policy.

Sources of Information in CRISP

The sources of information in the system include any individual member of the public, agency, or corporation that chooses to provide correspondence or comments in response to a Notice of Proposed Rulemaking (NPR) or other proposal published by the FDIC for public review. Comments may be submitted directly to FDIC by members of the public via email to the "Comments@FDIC.gov" mailbox or through the FDIC's website at: <http://www.fdic.gov/regulations/laws/federal/propose.html>. Comments may also be submitted to FDIC in hardcopy format (e.g., mail, fax, or hand delivery), in which case authorized OES personnel scan and upload these hardcopy/paper comments into the system. CRISP imports the comments and stores them in a secure database.

CRISP also may receive comments from other agencies associated with a particular proposal. As applicable, these agencies securely submit the comments to FDIC via FDICconnect. CRISP imports the emails and stores them in a secure database.

Notice & Consent

The FDIC has posted an advisory on its website informing commenters that their comments, including any personal information they choose to include/submit, will be made publicly available. Individuals voluntarily choose to submit comments to FDIC. However, the FDIC does not provide an option to submit comments anonymously or to opt out of having comments (and any personal data contained therein) uploaded to CRISP. Additionally, comments may be shared with other applicable, authorized agencies on a "need to know" basis; FDIC does not provide an opt-out option to prohibit interagency sharing of public comments.

Access to Data in CRISP

FDIC access to CRISP is determined on a "need to know" basis for the purpose of reviewing and analyzing comments received in response to NPRs or other FDIC proposals. Access is controlled through the FDIC Identity Access Management System (IAMB) process. Authorized access includes staff located in the FDIC Division of Risk Management Supervision (RMS) Policy Program Development (PPD) Section. Other authorized FDIC users include Office of the Executive Secretary (OES) staff in FDIC's Legal Division who review for privacy data and redact PII submitted in comments prior to sending them to the FDIC Legal Division's Information Technology Unit (ITU) staff for publication onto a public-facing web page (www.FDIC.gov/regulations).

Authorized personnel from the agencies involved in the review process also have access to the proposal comments for the purpose of reviewing and analyzing them.

Public comments that have been received are made available via secured email to the following agencies that participate in the proposal review process and assist in the interagency analysis process: Federal Reserve Board (FRB), Office of the Comptroller of the Currency (OCC), Securities and Exchange Commission (SEC), U.S. Department of Housing and Urban Development (HUD), Federal Housing Finance Agency (FHFA), National Credit Union Administration (NCUA), and Consumer Financial Protection Bureau (CFPB).

Data Sharing

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

| System Name | System Description | Type of Information Processed |
|-------------|--------------------|-------------------------------|
| N/A | N/A | N/A |

Data Accuracy in CRISP

Authorized staff within the RMS PPD Section ensure that the comments received are accurate, timely, and complete.

Data Security for CRISP

A select number of employees in the RMS PPD are responsible for ensuring against unauthorized access and misuse.

Access levels and permission levels have been established, and access is provided only to those persons who have "a need to know" the information contained in the system in order to carry out their official job duties.

In accordance with OMB Circular A-123, and A-130, Appendix III, CRISP has controls in place to prevent unauthorized access to the data in the system. Security measures and controls consist of, for example: user identification and authentication, database permissions and software controls.

FDIC users are required to take annual Security and Privacy Awareness Training and certify that they will abide by the Rules of Behavior mandated for all users in the FDIC network.

All FDIC contractors are required to sign Contractor Confidentiality Agreements and Non-Disclosure Agreements, and complete FDIC's requisite Corporate Information Security and Privacy Awareness Training, which includes Rules of Behavior.

System of Records Notice (SORN)

CRISP does not operate under FDIC SORN.

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.

