

Privacy Threshold Analysis (PTA)
and/or Privacy Impact Assessment (PIA)

for

Property Tax Services

Quantum/G&A JV

(RECVR-15-C-0581)



Date Approved by Chief Privacy Officer (CPO)/Designee: 09/08/2016

SECTION I – OUTSOURCED INFORMATION SERVICE DESCRIPTION

1. Describe the outsourced service and its purpose.

The Federal Deposit Insurance Corporation (FDIC) acquires real estate assets and mineral interests throughout the United States and its territories. Quantum/G&A, JV (Quantum) has been designated by the FDIC to provide related Property Tax Services and to furnish all labor, materials, equipment, personnel, and services necessary to perform those services.

Quantum initiates Property Tax Services only after receipt of a written work assignment from the FDIC Oversight Manager (OM). The work assignment notifies Quantum which assets are assigned to its inventory and what services it is authorized to perform. The FDIC may assign assets to Quantum for them to begin gathering and maintaining information and authorizing Quantum to take specific actions. The FDIC, at its sole discretion, may add or remove assets to or from Quantum's inventory, or modify consulting requests at any time by providing written notification that has been approved by the Oversight Manager (OM). Multiple asset(s) and consulting service changes may be included in a single notification. The FDIC will notify Quantum of the assets that have been sold via the monthly inventory of assets. Quantum will have thirty (30) days from the date of the notice of an asset being removed or sold to update their monthly inventory.

Quantum obtains copies of existing or proposed tax collection actions, such as delinquent tax bills, tax liens, tax foreclosures, penalties, fees, interest charges, tax sale dates or other collection effort documentation, and analyzes that information to form the basis of its recommendations and the actions it takes. For instance, if real property taxes are delinquent; Quantum will obtain a tax statement showing the amount necessary to bring the delinquent taxes current. Quantum keeps copies of any FDIC paid tax receipts, protested outcomes, and amounts of payments or refunds on a secured third-party website. Information maintained on the website may contain legal documents and related PII that includes full names and home addresses.

2. Status of the Outsourced Information Service Provider:

- Solicitation/On-Boarding (Pre-Award; or At/Around the Time of Contract Award)
- Initial Assessment/Due Diligence (Post-Award)
- Ongoing Monitoring of Contract (Post-Award)
- Sunset or Disposition of Contract (Post-Award; At or Near Contract Expiration)
- Other (*Explain*):

SECTION II – DATA TYPE, SOURCES, AND USE

3. Describe all information/data that will be collected, used, maintained or generated by the Outsourced Provider (Vendor) as part of the services provided under the contract. If no information/data is involved, select Not Applicable.

The FDIC notifies Quantum of approved task orders via secure email. The task orders specify what Property Tax Service work assignments (assets) have been delegated to Quantum. Quantum downloads and stores the work assignment information to their local cloud-based

server, and uploads the information to their internal applications. Work assignment information contains limited PII; including property owners' full names, home addresses, and property tax IDs.

4. Describe the intended purpose and use of the above information/data. If no information/data is involved, select Not Applicable.

Information is collected, maintained, and used by Quantum in conjunction with providing property tax services for the FDIC, which may include protesting tax returns, monitoring due and past due amounts, ensuring timely payments, handling/supporting tax disputes, conducting litigation, and researching incidents/assets for the FDIC.

5. What types of personally identifiable information (PII) are (or may be) included in the information specified above? (*This is not intended to be an all-inclusive list. Specify other categories of PII, as needed.*):

PII Element	Yes	No
Full Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Place of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Security Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment Status, History or Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mother's Maiden Name	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certificates (e.g., birth, death, naturalization, marriage, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Medical Information (Medical Records Numbers, Medical Notes, or X-rays)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Home Address	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Phone Number(s) (non-work)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Email Address (non-work)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employee Identification Number (EIN)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Information (e.g., checking account #/PINs/passwords, credit report, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Driver's License/State Identification Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Identifiers (e.g., license plates)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Education Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Criminal Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Military Status and/or Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investigation Report or Database	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photographic Identifiers (e.g., image, x-ray, video)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6a. Please provide an estimate of the number of records maintained by the vendor for this contract that contain PII:

Estimated Number of Records Containing PII

0 <input checked="" type="checkbox"/>	1-500 <input type="checkbox"/>	501-1,000 <input type="checkbox"/>	1,001 - 2,500 <input type="checkbox"/>	2,501 - 5,000 <input type="checkbox"/>
5,001 - 7,500 <input type="checkbox"/>	7,501 - 10,000 <input type="checkbox"/>	10,000 - 50,000 <input type="checkbox"/>	50,000 - 100,000 <input type="checkbox"/>	over 100,000 <input type="checkbox"/>

6b. If “0” was answered for 6a, please explain¹: The contract TM has confirmed that Quantum has not been issued any active task orders as of June 23, 2016. In the event that a banking crisis occurs, the contractor may maintain over 100,000 records of PII.

7. What are the sources of data (both PII and non-PII) for the outsourced service/project? How is the data derived?

Data Source² (List all sources that the Outsourced Provider collects, obtains or receives data from, as part of the services provided under the contract.)	Type of Data Provided by Source & How It is Derived (Describe the type of PII and non-PII data provided by each source. If PII is included in the data, list the specific PII elements, and explain how the PII is derived.)	Does Data Include PII?
FDIC/DRR	The FDIC sends work assignments to Quantum via secure email. Quantum uploads received work assignments from the FDIC to their internal applications hosted on their cloud-based server. Downloaded work assignments from secure emails contain limited PII including property owners’ full names, home addresses and property tax IDs.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Paradigm Tax Group	Quantum’s subcontractor, Paradigm Tax Group, is notified via secure email of the work assignments. Work assignments, at times, may require Paradigm to visit and collect documentation and/or legal files related to the property from the local courthouse and/or the originating county’s property website. The documents received may or may not contain limited PII including property owners’ full names, home addresses and property tax IDs.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

8. As part of the outsourced service/project, will FDIC or the Outsourced Service Provider retrieve data or records using a personal identifier (e.g., name, address, SSN, EIN, or other unique identifier)?

No

Yes [When Quantum receives work assignments from the FDIC ORE office via secure email, they are identified by name and/or Property Tax ID number.]

Not applicable

¹ If the vendor has not received work to date for this contract and “0” is checked in 6a, please explain approximately how many records may be maintained by the vendor if they are awarded work under this contract in the future. Additionally, the Division responsible for this vendor must update this PIA to reflect the accurate number of records containing PII that the vendor maintains if this changes in the future.

² Examples of potential data sources include, but are not limited to: internal (FDIC) or external (non-FDIC) systems, websites, individual members of the public (e.g., customers, borrowers, etc.), FDIC employees, FDIC contractors, credit bureaus, commercial entities, public records, government agencies, etc.



This completes the PTA.

- Do not complete the rest of the form, if the service provider is not processing or maintaining sensitive PII. This is the case, if you checked:
 - NOT APPLICABLE for question 3 and NO for all items in question 5; OR
 - Only Full Name in question 5.

- Continue completing the remainder of the form, i.e., Sections III thru VI in their entirety (questions 8 thru 16), if the service provider is processing or maintaining sensitive PII. This is the case, if you checked:
 - YES for Social Security Number (SSN) in question 5; OR
 - YES for SSN or for Full Name in addition to one or more boxes in question 5.

- If you have questions or are unsure about whether or not you should complete the remainder of this form, please contact your Division ISM or the Privacy Program Office (privacy@fdic.gov).

SECTION III – DATA ACCESS AND SHARING

9. In the table below, specify the systems/applications and parties (FDIC and non-FDIC) that the Outsourced Service Provider will share or provide PII data to as part of the outsourced service. (Check “No” or “Yes” for each category. For each category checked “Yes,” specify who will have access to, be provided with, or maintain the PII, what PII elements will be accessed/shared/maintained by them, how the access or sharing will occur, and the purpose and use of this PII.)

PII Will Be Accessed By and/or Provided To:	Yes	No	If Yes, Explain How and Why the PII Will Be Accessed/Shared
9a. FDIC Outsourced Service Provider (OSP) Staff; OSP Subcontractors; and/or OSP Systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Quantum uploads the work assignment information obtained from FDIC to their internal applications, which are hosted on Quantum’s cloud-based server. The information may contain limited PII; including property owners’ full names, home addresses, and property tax IDs. Quantum’s subcontractor, Paradigm Tax Group, is notified via secure email of the work assignments. Paradigm is able to securely connect to Quantum’s cloud-based server to securely upload and download work assignment information. A Quantum Property Tax Services Senior Manager assigns each asset to a Paradigm Property Tax Professional. The Property Tax Professionals record their activities daily in Quantum’s internal applications and in their personal copy of the standardized Property Tax Analyses Excel worksheet maintained for their assigned asset(s). Quantum’s Managing Director is responsible for ensuring proper handling of data by Quantum personnel and by subcontractor personnel.
9b. FDIC Personnel and/or FDIC Systems/ Applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	On a weekly basis and, as needed for ad-hoc reporting, Quantum compiles all individual Property Tax Analysis Excel worksheets into one combined worksheet and reviews it for policy compliance, accuracy, and completeness. The Excel worksheets may contain limited PII including, property owners’ full names, home addresses and property tax IDs. Quantum then submits a Property Tax Database Monthly Report to the FDIC via secure email. The monthly report is then reviewed by the contract’s OM and TM, and then routed to the ORE Office.
9c. Individual Members of the Public (e.g., bidders, investors, borrowers, customers, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
9d. Other Non-FDIC Entities/ Parties and/or Non-FDIC Systems/Applications	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
9e. Federal, State, and/or Local Agencies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

9f. Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
-----------	--------------------------	-------------------------------------	-----

10. If data will be provided to, shared with, or maintained by non-FDIC entities (such as government agencies, contractors, or Outsourced Information Service Providers), have any of the following agreements been issued?

Data Protection and/or Sharing Agreements	Yes	No
FDIC Confidentiality Agreement (Corporation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
FDIC Confidentiality Agreement (Individual)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Non-Disclosure Agreement (NDA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Memoranda of Understanding (MOU)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information Sharing Agreements (ISA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Authentication Risk Assessment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Applicable Agreement(s) (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>If you answered NO to any item above, please provide additional information if available: Quantum is an outsourced service provider/vendor and is not subject to MOUs or ISAs.</p>		

SECTION IV – NOTICE AND CONSENT

11. Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

- No. Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. **(Explain why individuals are not able to opt out (either for specific data elements or specific uses of their data.):**
- Yes. Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. **(Explain how individuals may decline or consent to the use of their information.):**
- Not applicable. Information is not collected directly from individuals.

12. If PII is being collected via a public-facing website and/or application as part of this outsourced service, has the Outsourced Information Service Provider posted any of the following types of privacy policies or Privacy Act notices?

- No
- Yes **(If yes, check applicable box(es) below.)**
 - Link to FDIC Privacy Policy
 - FDIC Privacy Act Statement
 - Contractor Privacy Policy or Statement
 - No Privacy Policy has been posted

Not applicable

SECTION V – DATA SECURITY AND ACCURACY

13. Please assert what administrative procedures and technical safeguards are in place to protect sensitive PII data in the Outsourced Information Service Provider's care. [Provide the name of the Outsourced Service Provider and check all applicable box(es).]

Quantum has gone through the security review required by the FDIC's Outsourced Information Service Provider Assessment Methodology to determine and/or verify their having appropriate physical, technical and administrative security measures to safeguard FDIC-provided PII and other sensitive data. If it has gone through the Methodology, has it been approved? NO YES

The FDIC conducts background investigations (BIs) on key Quantum personnel and other applicable personnel prior to their beginning work on the contract.

Quantum is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of the Outsource Service Provider's facilities, personnel, hardware, software and its security and privacy practices by either the FDIC information technology staff, the FDIC Inspector General, or the U.S. General Accountability Office (GAO). These inspections may be conducted either by phone, electronically or in-person, on both a pre-award basis and throughout the term of the contract or task order, to ensure and verify compliance with FDIC IT security and privacy requirements.

Other (Explain any other administrative and/or technical safeguards in place to protect PII data in the Outsourced Information Service Provider's care.) ***Attach the Contract Clause Verification Checklist to the back of this form.***

14. What are the procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date? [Check all applicable box(es) and insert the appropriate response and System/Project name.]

Data is collected directly from individuals and/or from the failed financial institutions. As such, the FDIC and its vendors rely on the individuals and/or financial institutions to provide accurate data.

Quantum works with FDIC to verify the integrity of the data before, in conjunction with, and/or after inputting it into the system or using it to support the project.

As necessary, an authorized administrator checks the data for completeness by reviewing the information, verifying whether or not certain documents or data is missing, and as feasible, updating this data when required.

Other (*Please explain.*)

15. In terms of assuring proper use of the data, please assert whether the following statements are true for the Outsourced Information Service Provider. (Check all applicable box(es) and insert the name of the Outsourced Information Service Provider and title of the firm's senior management official.)

Within FDIC, the Quantum Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager (ISM) are collectively responsible for assuring proper use of the data. In addition, it is every FDIC user's responsibility to abide by FDIC data protection rules which are outlined in the FDIC's Information Security and Privacy Awareness training course which all employees take annually and certify that they will abide by the corporation's Rules of Behavior for data protection.

Additionally, the Outsourced Information Service Provider is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and the vendor has designated their Managing Director to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the data. All vendor personnel with access to the data are responsible for protecting privacy and abiding by the terms of their FDIC Confidentiality and Non-Disclosure Agreements, as well as the vendor's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data. (Refer to Section III of this Privacy Impact Assessment for more information on data access criteria.)

The Outsourced Provider must comply with the Incident Response and Incident Monitoring contractual requirement.

None of the above. *(Explain why no FDIC staff or Outsourced Information Service Provider personnel have been designated responsibility for assuring proper use of the data.)*

SECTION VI – DATA RETENTION AND DISPOSAL

16. Where will the Outsourced Service Provider store or maintain the PII data identified in question 5? Describe both electronic and physical storage repositories, as applicable.

Quantum receives work assignments via secure email from the FDIC. Quantum downloads and stores the work assignment information to their local cloud-based server and then uploads it to their internal applications. The server data is backed up daily to their backup server located offsite. Both servers are protected by firewalls, and have secure uploading & downloading abilities.

17. Specify the period of time that data is retained by the Outsourced Service Provider and the specific procedures for disposing of or returning the data at the end of the retention period or contract, whichever is first.

Quantum retains sufficiently detailed records, documents, correspondence and supporting materials, pertaining to performance reports, FDIC oversight management inspections/audits/examinations of records, funding and/or costs incurred in performing Property Tax Services for three (3) years following final payment under the Property Tax Services contract, or longer when required by statute. If the Property Tax Services contract is terminated, completely or partially, Quantum will maintain the materials described above for three (3) years following any final settlement. The period of access and examination is automatically extended for ordinary business records that relate to claims or litigation arising from the performance or costs and expenses associated with the Property Tax Services contract. Quantum must maintain and make available to the FDIC records relating to appeals under the "Disputes" clause of the Property Tax Services contract, or to claims or litigation associated with the contract, until the appeals, claims or litigation are resolved