

PRIVACY IMPACT ASSESSMENT

DRR Locator and Reporting System (DOLLARS)

July 2011

FDIC Internal System

Table of Contents

[System Overview](#)

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

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

[Sources of Information in DOLLARS](#)

[Notice & Consent](#)

[Access to Data in DOLLARS](#)

[Data Sharing](#)

[Data Accuracy in DOLLARS](#)

[Data Security for DOLLARS](#)

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

[Contact Us](#)

System Overview

The Federal Deposit Insurance Corporation (FDIC) Division of Resolutions and Receiverships (DRR) Investigations Section uses the DRR Locator and Reporting System (DOLLARS) primarily to track investigation information and professional liability claims. DOLLARS is comprised of the following five basic components:

1. The first component in DOLLARS is institutional. This contains the name of the failed institution and the transaction involved with the failure. There is no Personally Identifiable Information (PII) contained in this component of DOLLARS.
2. The second component contains non-PII and limited PII pertaining to each claim (e.g. Bond, Director and Officer Liability, Attorney Malpractice, Account Malpractice, Appraiser Malpractice, and Other). This component is used to track each claim to conclusion. Within this section, tracking is also maintained for those judgment, settlements, or note receivables that are obtained from either individuals or firms/companies. Within the judgments, settlements or note receivables, DOLLARS has sub-screens, with the ability to track individual defendants by name and Social Security Number (SSN). These are rarely used for the individuals. In this section, DOLLARS also tracks payments from insurance companies, individual firms or companies and the individual themselves.
3. The third component of DOLLARS contains PII and non-PII pertaining to criminal restitutions. Within this section, the name of the defendant, status of the order, the amount of the order, SSN and payment histories are included. DOLLARS stores and tracks payments received from professional liability claims and criminal restitutions from failed financial institutions. Data is tracked for Bond, Director and Officers, Accountant's Liability, Attorney's Malpractice, Appraiser's Malpractice and Other Claims (e.g., Broker, Fraud, Consultant and Borrower).
4. The fourth component consists of Directors and Officers, accountants, attorneys, appraisers, brokers, bank employees, and other Persons of Interest (POIs) who were considered to be possible suspects in the failure of the institution. This list is normally comprised of the POI names and positions within the institution before failure. This section also has the capability to identify these individuals by SSN.
5. The fifth component of DOLLARS contains information regarding suspicious activity. Suspicious Activity Reports (SARS) are generated at a closing (based on information submitted by the bank before failure or by the FDIC after closing). Individuals are normally identified by name and SSN, as well as their suspected violation.

Data for DOLLARS is acquired from a failing institution, from the FDIC team finalizing the closing of an institution, or from the courts further to the filing of a Judgment and Commitment Order. Additionally, data in DOLLARS may be derived from other FDIC systems, the Department of Justice (DOJ), state agencies, and/or third-party sources. Authorized FDIC DRR Investigations personnel manually input data into DOLLARS.

The secondary purpose of DOLLARS is used to screen potential FDIC employees and contractors before employment by the Corporation. This use of DOLLARS reduces the risk to the Corporation of employing individuals suspected of involvement in the failure of a financial institution.

Personally Identifiable Information (PII) in DOLLARS

DOLLARS is comprised of the following five basic components and the types of personal identifiable information (PII) contained in each component is as follows:

1. **Institutional:** No PII is contained in this section.
2. **Claim (bond), Director and Officer Liability, Attorney Malpractice, etc.:** This section of DOLLARS includes judgments, settlements or note receivables from either individuals or firms/companies. The PII about individuals is limited to full name, position (at the failed institution), occupation, SSN, potential income amount, net worth, type of investigation, and whether the individual is a POI, a defendant, deceased, or bankrupt. This section of DOLLARS also contains fields for entering the individual's date of birth (DOB), date of death (if applicable), and bankruptcy date (if applicable).
3. **Criminal Restitutions:** This section may contain PII about individuals named in restitution orders and is limited to individual's full names and SSNs.
4. **Directors and Officers:** This section of DOLLARS may contain PII about POIs, such as bank employees, Directors and Officers, accountants, appraisers, brokers, or other individuals suspected of involvement in the failure of a financial institution, such as full name, position (at the failed institution), occupation, SSN, type of investigation, potential income amount, net worth, date of birth, date of death (if applicable), and bankruptcy date (if applicable).
5. **Suspicious Activity:** The PII about individuals in the section is limited to SSN and name.

Each section in DOLLARS also contains a "Comments" field. While the "Comments" field is generally used to track the status of the case, sensitive information and/or PII about individuals associated with the case could potentially be entered into this field. Additionally, DOLLARS does not contain a field for address information; this information is typically acquired from the courts or from DOJ and, if it is retained, it is included in the "Comments" field for the relevant section.

Purpose & Use of Information in DOLLARS

The data maintained in DOLLARS is both relevant and necessary for the purpose for which the system was designed, namely to support the business functions to identify monies from claims and restitutions.

Data retrieval in the five components of DOLLARS is retrieved by last name or first name. SSN and name are the primary tracking method for DOLLARS. Only the name may be used in the search function.

POI information in DOLLARS is used to screen potential FDIC employees and contractors prior to employment. This use of DOLLARS is helpful to ensuring that the Corporation does not employ individuals who are suspected of involvement in the failure of a financial institution.

Additionally, DOLLARS provides a variety of reports that include PII and non-PII data. These reports are used to compile aggregate data for management reports and for research purposes. Distribution of reports is a manual process and is only shared with authorized users of the data.

Sources of Information in DOLLARS

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

- **DRR Investigations Staff:** Authorized DRR Investigations staff manually enters data into DOLLARS during the course of their investigative work and analysis from failed financial institutions. Part of the data is based on Judgment and Commitment Orders from the courts. Certain data may be derived from information collected from the failed financial institution, in both hard copy and electronic format. DRR Investigations may obtain data by inventorying the desks of key bank personnel at the failed institution; auditing expense accounts; reviewing loan files; examining board of directors' minutes; tracing loan proceeds; reviewing data captured by DRR Data Management Services (DMS) staff from certain hard drives, file shares and/or emails off of the failed institution's exchange server; and interviewing key failed institution personnel. Other sources of data may include information from other FDIC systems, such as information about payments from the New Financial Environment (NFE).
- **Department of Justice (DOJ):** The Criminal Restitution component within DOLLARS is derived from information provided by the DOJ at the request of DRR Investigations staff. This information includes information relating to collection activity on criminal restitution orders. The information provided may include name, address, and SSN.
- **State and Local Agencies:** The DRR Investigations staff may obtain data from State Officials whose court handled the case or other state agencies, such as the State Division of Corporation, State Business and Labor, and Secretary of State. The information obtained from these state agencies is used by the DRR Investigation staff to confirm collection activity for criminal restitution orders. Additionally, DRR Investigations staff may obtain a Judgment and Commitment Order from the courts providing criminal restitution data of individuals convicted of contributing to the failure of a financial institution.
- **Credit Report Bureaus:** DRR Investigation staff may request credit reports, such as debts and the location of assets from credit reporting bureaus.
- **Commercial Database and Third-Party Services:** The DRR Investigation staff utilizes commercial databases and third-party data aggregator services, such as CLEAR and LexisNexis, to establish or confirm an individual's asset information, in order to collect on active criminal restitutions or pursue collection on Directors and Officers (D&O) claims.

All information is manually entered into DOLLARS by authorized DRR Investigation staff.

Notice & Consent

Individuals do not have the opportunity to “opt out” of providing their information for inclusion in DOLLARS. Data is collected directly from the financial institution and not directly from individuals. The PII in DOLLARS is necessary to verify that civil and criminal actions are not attached to the wrong individual’s records. The individual’s name and SSN are the primary tracking method for DOLLARS.

Access to Data in DOLLARS

Authorized DRR Investigations staff and select members of the FDIC Legal Division and the FDIC Office of Inspector General (OIG) working with DRR Investigations have access to the data in DOLLARS. Authorized DRR Investigations users have access to DOLLARS to fulfill their routine investigation work, collection activity, as well as to update status, payment information and to print reports. Additionally, select DRR Investigations staff also have access to DOLLARS to screen potential FDIC employees and contractors. Legal staff may only view/print reports.

Authorized Division of Information Technology (DIT) administrative and systems support staff have access to data in DOLLARS for purposes of system development, maintenance and support.

All users must obtain approval from their manager, the DOLLARS Data Owner, and the DOLLARS Program Manager to be granted access to DOLLARS. All access granted is determined on a “need to know” basis and each user’s access is limited to a role-based access control system to restrict user access to the minimum necessary to perform their duties.

Data Sharing

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

An automated text file is imported from the FDIC asset servicing contractor to update DOLLARS. No other systems currently share or have access to data in the DOLLARS system.

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

Data Accuracy in DOLLARS

The DOLLARS Program Manager is responsible for assuring proper use and integrity of the data. The DOLLARS Program Manager and Information Security Manager (ISM) serve as the sources of information for data definition and data protection requirements.

The data in the five components of DOLLARS is verified for completeness on a case-by-case basis and this verification is measured by management.

Data Security for DOLLARS

The Information Technology Security Manager, Project Manager and the DOLLARS Program Manager share the responsibility of protecting the data in DOLLARS. All system users are responsible for abiding by the FDIC's Rules of Behavior for data protection that are outlined in the Corporation's mandatory Information Security and Privacy Act Orientation training which all employees must complete annually. Contractors must sign an annual Contractor Confidentiality Agreement to be granted access for the development, enhancement and maintenance support for DOLLARS.

In accordance with OMB Circulars A-124, and A-130, Appendix III, DOLLARS has controls in place to prevent unauthorized access to the data in the system. Security measures and controls consist of: passwords, user identification, database permissions and software controls. An access matrix is established to prevent inadvertent disclosure to individuals not authorized to use the system or to those who do not have a need to know specific information in the system.

System of Records Notice (SORN)

DOLLARS operates under the FDIC Privacy Act SORN 30-64-0013, *Insured Financial Institution Liquidation 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.

