FEDERAL DEPOSIT INSURANCE CORPORATION
INSURING AMERICA'S FUTURE

PRIVACY IMPACT ASSESSMENT

U.S. Office of Personnel Management (OPM) Electronic Delivery System (eDelivery)

April 2013

FDIC External System

Table of Contents

System Overview

The FDIC Division of Administration (DOA) Security and Emergency Preparedness Section (SEPS) is responsible for, among other things, completing preliminary background checks on prospective employment standards as set forth by FDIC. DOA SEPS works with the U.S. Office of Personnel Management (OPM) Federal Investigative Services (FIS) to conduct background investigations (BIs) on FDIC employees and contractors to determine their suitability for positions that require a security clearance. OPM provides the results of the investigation to DOA SEPS for use in resolving the case according to FDIC's fitness and integrity standards.

To this end, OPM uses the Electronic Deliver (eDelivery) system, an IT service that electronically packages and delivers investigation files[1] from OPM to requesting agencies. eDelivery eliminates the process of physically mailing out hardcopy investigation files and allows agencies to process the files as needed based on the automation and technology systems they have in place. eDelivery is externally hosted and supported by OPM. The transmission of data occurs as a one-way feed from OPM to FDIC's Extranet server using "Connect: Direct Secure+" transfer software. Authentication and encryption are applied between servers to ensure secure file transfer. FDIC and OPM have executed a Memorandum of Understanding (MOU) to govern the protection of data transmitted via eDelivery.

eDelivery assembles and transmits the contents of the investigation files into an encrypted file known as a Distributed Investigative File (DIF). The DIF may contain sensitive personally identifiable information (PII) about the BI subject; this includes full name, Social Security Number (SSN), home telephone number and address, date of birth (DOB), past residences, criminal records, employment information, and credit history, along with other applicable background information. The DIF can also contain sensitive PII about other individuals, such as spouses, close relatives, and people who are familiar with the individual undergoing the BI.

The DIF is received by FDIC via eDelivery and downloaded by DOA SEPS personnel. Only authorized DOA SEPS staff and contractors have access to the eDelivery files on the shared drive in order to resolve and track the status of BI cases. After employment eligibility has been determined and the data is no longer needed, DOA SEPS destroys the original, electronic DIF.

Personally Identifiable Information (PII) - eDelivery Files

eDelivery securely packages and transmits the content of investigation files in an encrypted file known as a Distributed Investigative File (DIF). The PII contained in the DIF varies according to the type of investigation and other factors, such as whether there were issues with the BI case, or the inclusion of artifacts to support the investigation, etc. Examples of the types of PII that may be contained in the DIF include the following: full name, date of birth (DOB), place of birth, Social Security number (SSN), employment information, mother's maiden name, certificates (i.e., birth, death, naturalization, marriage, etc.),

[1] Currently, eDelivery is used to transmit closed, completed investigation files; reopen investigation files; straggler materials (i.e., items sent after the investigation has been closed); and electronic file requests (eFRs) which refers to previously completed OPM background investigations that were typically initiated by other government agencies.

medical history, home address and phone numbers, email address, financial information, legal documents, education records, criminal information, and military status.

Purpose & Use of Information - eDelivery Files

The PII identified above will be used to process, adjudicate, and track the status of FDIC background investigation cases. Background checks and investigation are a condition of employment with FDIC and contracting with FDIC.

Sources of Information - eDelivery Files

OPM provides the following files to FDIC via eDelivery: closed, complete investigation files; reopen investigation files; straggler materials (i.e., items sent after the investigation has been closed); and electronic file requests (eFRS).[2] eDelivery packages the investigation files in an encrypted Distributed Investigative File (DIF) and securely[3] transmits them to the FDIC. The following are examples of the types of PII documents that the DIF may contain:

- **Standard Form (SF)-85/85P/86**[4] – contains the subject's full name, SSN, DOB, place of birth, mother's maiden name, home address, personal telephone numbers, past residences, medical notes/history of drug and alcohol use, financial information, legal information, education records, military status, employment history, and foreign travel and activities. SF-85/85P/86 may also contain PII about current/former spouses, close relatives, and people who know the BI subject well. The SF-85/85P/86 is completed by the BI subject and submitted to OPM by FDIC DOA via OPM's Electronic Questionnaires for Investigations Processing (eQIP) system or in paper format.

- **Closing documents** – may include copies of the BI subject's credit reports, U.S. Federal Bureau of Investigations (FBI) fingerprint results, etc. OPM uses its Personnel Investigations Processing System (PIPS) to initiate fingerprint checks through the FBI, as well to initiate National Agency Check (NAC) queries which are sent to national record repositories, Department of Defense (DOD) investigation databases, and other pertinent government or commercial record repositories. The results of these checks, which can include FBI fingerprint and investigation records, DOD investigation records, and the subject's credit history, contain sensitive PII about the BI subject.

Notice & Consent

Individuals do not have the opportunity to opt out of providing their data. The personal information identified above is necessary to process, adjudicate, and track the status of background investigations of FDIC employees and contractors. Background checks and investigations are a condition of employment with FDIC and contracting with FDIC.

[2] eFR in this context refers to previously completed OPM background investigations that were initiated by other government agencies.
[3] Authentication and encryption is applied between servers to ensure secure file transfer.
[4] SF-85/86/86P refers to *Standard Form (SF) 85*, Questionnaire for Non-Sensitive Positions; *SF-85P*, Questionnare for Public Trust Positions; and *SF-86*, Questionnaire for National Security Positions.

Access to Data - eDelivery Files

eDelivery is an IT service that is operated and supported by OPM via IBM. OPM is the data owner of the investigation files, and authorized OPM staff and contractors have access to eDelivery for the purposes of packaging and delivering investigation files to requesting agencies, and for purposes of performing associated system administration, troubleshooting, and maintenance functions.

OPM currently uses eDelivery as a one-way conduit to push investigation files from OPM to FDIC's server. Otherwise, there are no other direct, automated interconnections between eDelivery and FDIC systems or applications. However, authorized FDIC DOA SEPS staff or contractors have the ability to manually enter certain data from the eDelivery files (i.e., the date the OPM investigation was completed and whether it was favorable or unfavorable) into other FDIC systems, such as the FDIC Background Investigation Results Tracking (BIRT) system and Corporate Human Resources Information System (CHRIS).

Authorized FDIC/DOA SEPS employees with a "need to know" require access to the eDelivery files order to process, adjudicate, and track the status of background investigations for FDIC employees and contractors. Authorized FDIC contractors who support DOA employees in processing and tracking the status of background checks will also have access to the eDelivery files. As necessary, certain data may be shared on a "need to know" basis with other FDIC parties, such as the Legal Division staff, to help deliberate and resolve fitness and integrity issues that arise during the course of background checks and investigations. Additionally, authorized FDIC Division of Information Technology (DIT) staff is responsible for maintaining the connection between OPM and FDIC. However, DIT staff do not have access to PII data transmitted through eDelivery.

Data Sharing

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

No other systems currently share or have access to data in the eDelivery files.

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

Data Accuracy - eDelivery Files

Data is provided and transmitted directly from OPM to FDIC via eDelivery. As such, FDIC relies on OPM to provide accurate data. As applicable, authorized FDIC DOA SEPS staff review the data for completeness, verifying whether or not certain documents or data are missing, and as feasible, request that OPM provide additional or corrected data.

Data Security - eDelivery Files

eDelivery is an electronic transfer method/service that is externally hosted and supported by a federal government agency, the U.S. Office of Personnel Management (OPM). It is OPM's policy to ensure that all information technology (IT) systems that collect, maintain, or disseminate PII have federally mandated controls in place to protect and prevent the breach of such data. Direct: Connect Secure+, the transmission software used to accomplish the file transfer for eDelivery, is certified to meet the FDIC's security requirements. In addition, authentication and encryption are applied between servers to ensure secure file transfer.

Additionally, OPM is responsible for assuring proper use of the data. Policies and procedures have been established to define this responsibility, and OPM has designed administrators to have overall accountability for ensuring the proper handling of data by its personnel. All personnel with access to the data are responsible for protecting privacy and abiding by the terms of their agreements with OPM and corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

System of Records Notice (SORN)

eDelivery operates under the FDIC Privacy Act SORN 30-64-0015, *Personnel 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.