

PRIVACY IMPACT ASSESSMENT

Environmental Request Tracking System (ERTS)

April 2014

FDIC Internal System

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System Overview

When a financial institution fails, and the Federal Deposit Insurance Corporation (FDIC) is appointed as receiver,¹ one of the FDIC's primary tasks is to dispose of the failed bank's loans and assets in a manner that maximizes their value. Some of these assets may consist of real estate properties owned or controlled by the bank, real estate collateral in the bank's possession, and/or real estate acquired through foreclosure or loan settlements. When the FDIC receives a failed institution's assets, specifically real property, environmental characteristics of those assets must be obtained before determining the best asset management and disposition strategy. The process for assessing properties for the presence or potential presence of environmental contamination often is referred to as "environmental due diligence" or "environmental site assessment."

The FDIC Division of Resolutions and Receiverships (DRR) contracts with third-party firms, known as Environmental Due Diligence/Site Assessment Contractors, to have environmental site assessments performed and certified for all real estate properties acquired from the failed institution. To this end, the Environmental Request Tracking System (ERTS) is an application used by DRR Environmental Contract Oversight (CO) personnel to provide a mechanism for tracking Environmental Site Assessment (ESA) requests made by FDIC Account Officers (AOs) and FDIC Asset Management Contractors. FDIC/DRR developed ERTS to provide a centralized method of issuing, tracking, and monitoring environmental requests, as well as to automate and streamline this process, replacing the previous method of Excel spreadsheets.

ERTS accesses the FDIC Institution and Contract Data Mart (ICDM) to securely import:

- Contract award data from the FDIC's Automated Procurement System (APS);
- FDIC personnel information from the Corporate Active Directory (AD), which includes limited personally identifiable information (PII) about FDIC employees and contractors who are assigned to environmental requests, such as name and network ID (NTID); and
- Financial Institution demographic data (non-PII) from the FDIC's Communication, Capability, Challenge, and Control system (4C) in order to manage the process.

Personally Identifiable Information (PII) in ERTS

ERTS pulls the following data about FDIC employees and contractors who are assigned to Environmental Site Assessment (ESA) requests from the Corporate Active Directory (AD): name, network ID (NTID), network access effective date, network access termination date, work phone number, and work email address. The

¹ A receiver steps into the shoes of a failed financial institution with the goal of liquidating the entity. Federal law grants the FDIC the responsibility to manage the resolution of failed financial institutions. The FDIC as the receiver has similar powers and responsibilities as a bankruptcy trustee. The FDIC can collect all obligations and money due to the failed institution and liquidate its assets and property. The funds generated are used to pay the creditors of the failed institutions. Although many of the concepts central to the operation of an FDIC receivership are similar to those of the bankruptcy process there are critical differences between bankruptcy and the FDIC receivership law.

application also contains the name of the external vendor/contractor Point of Contact (POC) and work-related contact information.

Failed bank borrowers' property addresses may be entered manually into the system in the Environmental Order Request screen. Additionally, certain documents may be uploaded into the system as attachments, such as Legal Descriptions and Taxpayer Identifications/Notices. The Legal Description may contain limited, non-sensitive PII such as borrower name and property description. The Taxpayer Identifications may contain Parcel Numbers/Taxpayer Identification Numbers (TINs)/Social Security Numbers (SSNs) (including individual SSNs), property address, assessed/fair market values, and tax information. Parcel Numbers/TINs/SSNs may also be manually entered and populated in the system.

ERTS contains non-sensitive, non-PII, demographic data about financial institutions, such as institution name, address, insurance certificate number, close date, and FDIC fund ID, fund type, and fund description.

Purpose & Use of Information in ERTS

The FDIC employee/contractor data is used strictly for the purposes of assigning, tracking, and managing environmental assessment requests. The Legal Descriptions and Taxpayer Identifications/Notices, which may contain sensitive PII about borrowers, are necessary for the purpose of relating property location and demographics to the Environmental Specialist who will be performing the assessment. Often, the Asset Manager scans copies of closing documents, which contain sensitive PII, and attach these to the environmental assessment request. The TIN/SSN embedded into some attachments is occasionally used to search public records to find a property location, in instances where a parcel number is not available or has not been provided.

Sources of Information in ERTS

ERTS accesses the FDIC Institution and Contract Data Mart (ICDM) in order to import data from the following sources:

- **FDIC Automated Procurement System (APS)** – Contract award data is collected from APS, which includes the name of the Vendor/Contractor POC (non-sensitive PII), along with work-related contact information. Also includes the award number, contracting officer, division, effective date, award value, monthly and year-to-date and total expenditure amounts, expiration dates, oversight manager ID, vendor code, award status, and NAICS code and description.
- **FDIC Corporate Active Directory (AD)/Global Address List (GAL)** – FDIC personnel information is collected from the AD/GAL, which includes employee/contractor name, network/user ID, network access effective date, and network access expiration, along with work-related contact information.
- **FDIC Communication, Capability, Challenge, and Control System (4C)** – Financial institution demographic (non-PII) data Financial Institution

Demographic (non-PII) data is collected from the 4C system. As a note, while Financial Institution Demographic data is public record information, such as Institution Name, Address, City, State, Zip Code, Insurance Certificate Number, and FDIC Fund ID, this information is not being collected by ERTS from a third-party source.

Additionally, authorized system users may upload certain documents into the ERTS system as attachments, such as Legal Descriptions and Taxpayer Identifications/Notices. These documents are received from authorized FDIC-contracted vendors (e.g., Loan Servicers and Real Estate Asset Management Companies) who submit the documents via secure, electronic format using, for example, password-protected ZIP files or via FDIC Secure Mail (ZIX).

ERTS may receive environmental assessment requests via an online form designed into the system that FDIC contractors with an FDIC Network ID and access permission to the ERTS application can use to initiate ESA requests. The role of third parties accessing the system is limited to initiating ESA requests and searching for ESA requests that have been initiated by employees of their own company.

Notice & Consent

Individuals cannot “opt out” of providing their personal information or consent to only particular uses. ERTS data is necessary to track Environmental Site Assessment requests made by FDIC Account Officers and FDIC Asset Management Contractors. FDIC is required to have an environmental site assessment performed and certified for all real estate properties it has acquired from failed financial institutions and as a result of loans collateralized by real estate that have gone to foreclosure. Therefore, an opt-out is not provided.

Access to Data in ERTS

Access is limited to authorized DRR employees. All FDIC users who have access to the data in ERTS must have the approval of their Manager/Supervisor and the Program Manager/Data Owner of the requested capability to be granted access. Additionally, the ERTS application's functional security limits a user's access to specific functions and regulates a user's ability to update data based on the user-assigned network (NT) group. All access granted is determined on a “need to know” basis. Guidelines established in the Corporation's Access Control policies and procedures are also followed. Controls are documented in the system documentation. A user's access is tracked in the Corporation's access control tracking system. Additionally, user access to the application is logged in an audit file.

Data Sharing

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

Data in ERTS is currently not shared with any other systems.

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

Data Accuracy in ERTS

Data in the system is provided to ERTS via the FDIC's Institution and Contract Data Mart (ICDM). This data mart contains 4C Financial Institution demographic data, APS Contract Award data, and the Corporate Global Address List data. Data is delivered to ERTS via a direct connection to ICDM where a SQL query is used to retrieve the requested data elements.

In terms of checking the data for completeness, preliminary data validation is performed on the data during the process to commit the data from the ERTS Staging tables to the Core tables. Data elements failing the validation are kicked out and an exceptions report is generated as part of the audit reporting process.

Regarding the timeliness of data in the system, ICDM is updated nightly to ensure the data is timely and up-to-date.

Data Security for ERTS

The ERTS system has security controls in place in accordance with Office of Management and Budget (OMB) mandates. In particular, ERTS follows security guidance, per National Institute of Standards and Technology Special Publications (NIST SP) 800-53, which includes managerial, technical, and operational security controls. All users of the ERTS system must abide by the DRR Security and Privacy Awareness Course which encompasses all DRR applications and network resources. In addition, all users must complete and abide by the Corporation's Information Security and Privacy Awareness Training, which includes the Corporate Rules of Behavior for protecting the privacy and security of sensitive information.

System of Records Notice (SORN)

ERTS does not operate as a Privacy Act system of 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.

