

# PRIVACY IMPACT ASSESSMENT

## iComplaints (iComplaints)

June 2008

FDIC External System

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## System Overview

iComplaints is used by the FDIC Office of Minority and Women Inclusion (OMWI) and the FDIC Legal Division to track Equal Employment Opportunity complaints. iComplaints is a commercial-off-the-shelf (COTS) web-based service, hosted by an off-site vendor, MicroPact Engineering, Inc. The federally mandated reports generated by the system are the Annual 462 Report<sup>1</sup> and the Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act) Report<sup>2</sup>.

## Personally Identifiable Information (PII) in iComplaints

Data collected by iComplaints includes: Full Name, Date of Birth, Employee Identification Number, Home Address, Phone Numbers, Medical Information, Investigation report or database, Device Identifiers, Web URLs (personal), E-mail Address (non-work), Education Records, Military Status and/or Records and Employment Status and/or Records. This information is collected only from employees and job candidates seeking employment with the FDIC who wish to file an EEO complaint. Data is not collected from members of the general public.

## Purpose & Use of Information in iComplaints

It is a requirement that this system be able to accurately identify the employee who is making the complaint, and that the information to contact the complainant is accurate and up to date.

## Sources of Information in iComplaints

FDIC employee information is manually transferred by authorized OMWI employee from the National Finance Center (NFC), an U.S. Department of Agriculture (USDA) personnel system used by the FDIC. It may also be entered directly from information provided by the complainants.

## Notice & Consent

iComplaints does not specifically require individuals to provide any of their personally identifying information. However, resolution of the EEO complaint is understandably

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<sup>1</sup> The U.S. Equal Employment Opportunity Commission produces an Annual Report on the Federal Workforce that includes, among other data, information on federal equal employment opportunity complaints and Alternative Dispute Resolution activities (EEOC Form 462). This data is collected from the FDIC and other agencies in the Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints (EEOC Form 462).

<sup>2</sup> The Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act) or Public Law 107-174 seeks to discourage federal managers and supervisors from engaging in unlawful discrimination and retaliation. Federal agencies are required to post quarterly on their public Web sites certain summary statistical data relating to equal employment complaints filed against the respective agencies. Additionally, federal agencies are required to submit an annual report to the Speaker of the House of Representatives, the President Pro Tempore of the Senate, the Committee on Governmental Affairs of the Senate, the Committee on Government Reform of the House of Representatives, each committee of Congress with jurisdiction relating to the agency, the Equal Employment Opportunity Commission, and the Attorney General.

limited when contact information is not provided. There is no dissemination of information to outside agencies.

## Access to Data in iComplaints

Members of the FDIC who have access to iComplaints are authorized employees of OMWI and the Legal Division who need to enter case information and update ongoing investigations as a part of their job functions. Access to iComplaints is determined by the OMWI Complaints Processing Branch and is limited to authorized for individuals who have a need to know the information in order to carry out their official duties.

All iComplaints users who manage EEO cases require access to the majority of data contained in the system, including employee information. However, the EEO complaint caseload of the Legal Division and OMWI are segregated so that users will only be able to access EEO complaints within their respective caseloads. Access to certain administrative functions, such as adding new users, is restricted to system administrators. Only designated Super Users can add or modify data.

## Data Sharing

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

No other systems share or have access to the data iComplaints.

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

## Data Accuracy in iComplaints

Information is entered manually into the system as provided directly the employee making the complaint. To ensure data accuracy, there are three levels of review for iComplaint case information: peer review, Complaints Processing Branch management review, and Quality Control Review Committee (QCR) review.

## Data Security for iComplaints

In addition to completing mandatory iComplaints training, all users are required to take FDIC's annual IT Security Awareness and Privacy Act Training, and will be required to take iComplaints system training. The system does not do any monitoring of individuals for whom privacy information is kept. Certain aspects of the system do trace transaction histories that indicate that the EEO representative has performed some work or action, and this may be used in a case review.

The service vendor, MicroPact, requires two a factor authentication for access. Authorized users are issued a user ID, a password, and a certificate.

## System of Records Notice (SORN)

iComplaints operates under the Government-wide Privacy Act SORN EEOC/GOVT-1, *Equal Employment Opportunity in the Federal Government Complaint and Appeal 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](mailto: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.

