

# PRIVACY IMPACT ASSESSMENT

## Interagency Exam Repository (IER)

May 2014

FDIC Internal System

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## System Overview

The Division of Risk Management Supervision (RMS) within the FDIC promotes stability and public confidence in the nation's financial system through examining and supervising insured financial institution, and monitoring and mitigating systemic risks. RMS examiners produce Reports of Examination (ROE) when they conduct examinations of financial institutions as part of the FDIC's supervisory responsibilities. The ROE is the official record of an examination. As such, it goes through a post-examination review and signing process before it is considered complete and subsequently stored on the Interagency Examination Repository (IER). IER is an RMS system that stores electronic copies of ROEs and routes them through the review and signing process. Information contained in IER cannot be retrieved using a unique identifier as the system is not capable of retrieving data based on any personally identifiable information.

## Personally Identifiable Information (PII) - IER

Reports of Examination (ROE) maintained in IER typically contain personally identifiable information about individuals affiliated with financial institutions, such as board members, senior management, and/or borrowers of the institution. This includes full name, home addresses, and/or loan numbers when adversely classified loans are individually identified in the ROE. Older banking systems often used an individual's Social Security number (SSN) as a Customer Identification Number to link various accounts and loans belonging to that individual. In conducting examinations of older banking institutions, the RMS examination officer may inadvertently include SSNs in the ROE to identify loan numbers; this number would still be identified as a loan number and not the borrower's SSN.

Information contained in an ROE is collected directly from the records of the financial institution being examined. Additionally, state banking departments may submit ROEs for inclusion into the IER system. The data provided by state banking departments are shared with the FDIC as part of coordinated supervisory activities.

## Purpose & Use of Information - IER

The data in IER is both relevant and necessary to the examination process and to the purpose for which the application was developed (i.e., to support the ROE review, storage, and retrieval processes).

## Sources of Information - IER

Data is collected from each financial institution's records during an examination. As part of FDIC's coordinated supervisory activities, state banking departments may submit ROEs containing PII into the IER system.

## Notice & Consent

Individuals are not able to opt out or decline to provide their information for inclusion in the ROE. RMS examiners have legal authority to review bank records and conduct ROEs as part of their investigation into the soundness and viability of a financial institution. The information contained in the ROE is collected directly from the financial institution's records; therefore, it is not possible to opt out on an individual basis.

## Access to Data - IER

Authorized RMS examination staff and management including financial institution examiners, supervisors, and individuals with ROE review and signature authority have access to IER data. By agreement and pre-determined access levels, state examiners are restricted to IER examination data for institutions under their regulatory authority. Additionally, when access is requested for purposes of an audit, pre-determined Office of Inspector General (OIG) and Government Accountability Office (GAO) auditors are granted access to the IER system. Further, as approved by senior management, FDIC internal review staff is provided IER access.

IER data is only available to authorized users on FDIC-controlled networks (Intranet and Extranet). Authorized FDIC users generally have access to all data in the system. An FDIC user must belong to an RMS network group that maps to IER and provides access to the web-based portal and application server. State users must possess Extranet credentials and an FDIC Extranet browser certificate. A state user's account must belong to an Extranet network group that maps to IER and provides access to the web-based portal and application server. State users are restricted to data relating to institutions that fall under their respective state's regulatory authority.

## Data Sharing

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

System Name	System Description	Type of Information Processed
Virtual Supervisory Information On the Net (ViSION)	The Virtual Supervisory Information On the Net (ViSION) system is a web-based system used primarily to assess risks to the deposit insurance fund associated with the operations of insured depository institutions and their affiliates and servicers. IER interfaces with ViSION to retrieve relevant examination data. IER does not export any data.	Information related to the examination of financial institutions (no sensitive PII)
Structure Information Management System (SIMS)	SIMS maintains current and historical non-financial data for all institutions. IER interfaces with SIMS to retrieve relevant examination data.	Non-financial bank examination data (non-sensitive PII)

## Data Accuracy - IER

The amount of PII or sensitive information included in the ROE, such as customer names, account numbers, or insider addresses is generally very limited. If the information is included, it is checked for completeness using general auditing techniques. Financial information included in ROEs is verified through completeness checks embedded in examination software and through general auditing techniques.

Examination teams verify data obtained from bank records using standard auditing techniques. Authorized IER users are responsible for the content of files entered into IER and must have current antivirus software on their desktops and laptops. Input into IER is restricted to specific file types, and IER does not accept executable files.

## Data Security - IER

Authorized FDIC personnel can generally retrieve any data within IER. The FDIC personnel activities, and use of bank-related data, are governed by written RMS standards, policies, and directives. RMS considers the ROEs to be confidential documents and does not share ROE contents with the general public.

Authorized state regulators are restricted to IER data for institutions that fall under their regulatory authority. State personnel are governed by their own policies, directives, and examination practices in addition to their states' agreements with the FDIC. State banking departments also consider ROEs to be confidential documents and do not share ROE contents with the general public.

For the FDIC financial institution examination team, the Examiner-in-Charge is responsible for the actions of the examination team and ensuring the confidentiality of data gathered during examinations. RMS supervisors and management are responsible for maintaining information confidentiality while information is in their possession/control.

## System of Records Notice (SORN)

IER does not operate as an FDIC 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](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.

