

Privacy Threshold Analysis (PTA)  
and/or Privacy Impact Assessment (PIA)

for

Lexicon Relocations Government Services

(LRGS)



Date Approved by Chief Privacy Officer (CPO)/Designee: 10/22/2018

PTA/PIA TEMPLATE VERSION 1.9 - August 2017

## SECTION I – OUTSOURCED INFORMATION SERVICE DESCRIPTION

### 1. Describe the outsourced service and its purpose.

The Division of Finance (DOF) has procured the services of Lexicon Relocation Government Services (LRGS) to provide employee<sup>1</sup> relocation services including home sales, home purchases, household goods, shipping, move management, and temporary housing. LRGS supports DOF’s “Make Disbursements” and “Manage Travel and Relocation” business processes by managing the payments processing pertaining to the relocation of FDIC employees. LRGS supports FDIC’s mission by providing payment information for employees.

The process is initiated when the relocating employee’s supervisor submits via email an FDIC Official Notification of Relocation (ONOR) form to the DOF Travel Services Section (TSS). The ONOR contains information about the employee, such as name, email address, Employee Identification Number (EIN), phone numbers (personal and office), home address, auto registration, driver’s license, vehicle identifiers, date of birth, and employment information. The form may also contain personal information pertaining to the employee’s spouse/partner (i.e., name and work phone number) and/or dependents (i.e., name and date of birth). In addition, the employee must attach to the ONOR a signed Agreement to Remain in Service form (FDIC 2530/08A), which includes the employee’s name, mailing address, EIN, and signature. A DOF TSS staff member logs into the LRGS website and enters the relocating employee’s information online, thus authorizing the FDIC employee for relocation through LRGS’s online portal (Lexicon360.com).

An authorized LRGS representative contacts the FDIC employee to obtain and confirm personal information and relocation benefits; this may include the aforementioned personally identifiable information (PII), along with financial information (bank account number, credit card number), driver’s license, vehicle identifiers/auto registration, military status, and additional information about the employee’s spouse/partner as specified in Section II. Additionally, LRGS may collect Social Security numbers (SSNs) for homeowners who elect to participate in the LRGS Home Sale Assistance program and for tax withholding purposes. Legal documents, records, and notes collected by LRGS in the process of assisting with a home sale may also potentially contain SSNs. LRGS uses this information for processing the relocation and generating a check to either the employee or the moving vendor secured by the employee.

The relocating FDIC employee can interact directly with LRGS by self-registering on the LRGS website. The employee can review their profile and provide updated information regarding his/her current mailing address, family information, financial information, and other personal information identified above. They can also use the website to complete and submit expense reports for costs associated with relocation. LRGS does not directly interface with other FDIC systems.

## SECTION II – DATA TYPE, SOURCES, AND USE

### 2. Describe all information/data that will be collected, used, maintained or generated by the Outsourced Provider (Vendor) as part of the services provided under the contract. If no information/data is involved, select Not Applicable.

The data collected by LRGS contains PII, such as the employee’s name, employment information, home address, home and office phone numbers, personal email address, EIN, financial information (bank account number, credit card number), driver’s license, vehicle identifier/auto registration,

<sup>1</sup> As used in this document, the term “employee” includes current FDIC employees, as well as new hires who have been offered and accepted a position with FDIC.

military status, and SSN. LRGS may also collect legal documents, records, and notes from the employee in the process of assisting with a home sale. The data collected by LRGS may include PII about the employee’s dependents, such as name and date of birth, and the employee’s spouse/partner such as full name, financial information (bank account number, credit card numbers), date of birth, SSN, personal email, and telephone number (personal or work).

**3. Describe the intended purpose and use of the above information/data. If no information/data is involved, select Not Applicable.**

The data is required to support the FDIC’s employee relocation program, including verifying the identity of the relocating employee and allowing the vendor to assist and process the relocation expenses for the relocating employee. This includes moving services, home sale and repurchase, car transportation, and tax withholding.

**4. What types of personally identifiable information (PII) are (or may be) included in the information specified above? *(This is not intended to be an all-inclusive list. Specify other categories of PII, as needed.)*:**

PII Element	Yes	No
Full Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date of Birth	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Place of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Security Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Employment Status, History or Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Mother’s Maiden Name	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certificates (e.g., birth, death, naturalization, marriage, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Medical Information (Medical Records Numbers, Medical Notes, or X-rays)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Home Address	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Phone Number(s) (non-work)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Email Address (non-work)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Employee Identification Number (EIN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Financial Information (e.g., checking account #/PINs/passwords, credit report, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Driver’s License/State Identification Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Vehicle Identifiers (e.g., license plates)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Education Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Criminal Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Military Status and/or Records	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Investigation Report or Database	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photographic Identifiers (e.g., image, x-ray, video)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**5. If Social Security Number (SSN) is checked in question 4, please answer the following:**

**a) Explain the business purpose requiring the collection of SSNs:** The SSN is required for purposes of tax withholding and home sale/repurchase.

**b) Provide the legal authority which permits the collection of SSNs.**

**Other - give justification:** 12 U.S.C. 1819, and Executive Order 9397, as amended.

**c) Identify whether the SSN is masked or otherwise truncated as part of the outsourced service:** As noted above, the full SSN is required for certain relocation activities, including sale and purchase of homes, as well as the preparation of tax withholding forms. The SSN is

encrypted in the vendor’s system and access is restricted to authorized personnel with a “need to know” in order to perform their business duties.

**6a. Please provide an estimate of the number of records maintained by the vendor for this contract that contain PII:**

Estimated Number of Records Containing PII				
0 <input type="checkbox"/>	1-500 <input type="checkbox"/>	501-1,000 <input type="checkbox"/>	1,001 – 2,500 <input type="checkbox"/>	2,501 – 5,000 <input type="checkbox"/>
5,001 – 7,500 <input type="checkbox"/>	7,501 – 10,000 <input checked="" type="checkbox"/>	10,001 – 50,000 <input type="checkbox"/>	50,001 – 100,000 <input type="checkbox"/>	over 100,000 <input type="checkbox"/>

**6b. If “0” was answered for 6a, please explain<sup>2</sup>:**

**7. What are the sources of data (both PII and non-PII) for the outsourced service/project? How is the data derived?**

Data Source <sup>3</sup> (List all sources that the Outsourced Provider collects, obtains or receives data from, as part of the services provided under the contract.)	Type of Data Provided by Source & How It is Derived (Describe the type of PII and non-PII data provided by each source. If PII is included in the data, list the specific PII elements, and explain how the PII is derived.)	Does Data Include PII? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
FDIC Employees	<p>The relocating employee fills out and emails the FDIC ONOR form, along with the Agreement to Remain in Service form, to DOF TSS. The ONOR form contains information about the employee such as name, email address, EIN, phone numbers (non-work), home address, and employment information. The form may also contain personal information pertaining to the employee’s spouse/partner (i.e., name and work phone number) and/or dependents (i.e., name and date of birth). The Agreement to Remain in Service form (FDIC 2530/08A), includes the employee’s name, mailing address, EIN, and signature. A DOF TSS staff member logs into the LRGS website and enters the relocating employee’s information online, thus authorizing the FDIC employee for relocation through LRGS’s online feature (Lexicon360.com).</p> <p>An authorized LRGS representative contacts the FDIC employee to obtain and confirm his/her personal information and relocation benefits. FDIC employees provide their full name, legal records, SSN, DOB, bank account numbers, home address, home phone number, work phone number, auto registration, driver’s license, military records, employment status, work email address, personal email address, SSN, and employee EIN. They may also provide information about their dependents (dependent’s name and DOB) and spouse/partner, such as</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<sup>2</sup> If the vendor has not received work to date for this contract and “0” is checked in 6a, please explain approximately how many records may be maintained by the vendor if they are awarded work under this contract in the future. Additionally, the Division responsible for this vendor must update this PIA to reflect the accurate number of records containing PII that the vendor maintains if this changes in the future.

<sup>3</sup> Examples of potential data sources include, but are not limited to: internal (FDIC) or external (non-FDIC) systems, websites, individual members of the public (e.g., customers, borrowers, etc.), FDIC employees, FDIC contractors, credit bureaus, commercial entities, public records, government agencies, etc.

	<p>the spouse's full name, financial information (bank account number, credit card numbers), date of birth, SSN, personal email, and telephone number (personal or work).</p> <p>The relocating FDIC employee can interact directly with LRGS by self-registering on the LRGS website. The employee can review their profile and provide updated information regarding his/her current mailing address, family information, and other information identified above, as well as use the website to complete and submit expense reports for costs associated with relocation. LRGS does not directly interface with other FDIC systems.</p>	
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**8. How will FDIC and/or the Outsourced Service Provider retrieve data or records as part of the outsourced service or project? Can data be retrieved using a personal identifier (e.g., name, address, SSN, EIN, or other unique identifier)?**

The vendor can use the employee's name, SSN, or EIN to retrieve information about the employee.

**9. In the Federal Register, under which Privacy Act Systems of Record Notice (SORN) does this system operate? Provide number and name:**

The LRGS outsourced relocation service operates under FDIC 30-64-0012, Financial Information Management Records system of records.



**This completes the PTA.**

- Do not complete the rest of the form, if the service provider is not processing or maintaining sensitive PII. This is the case, if you checked:
  - NOT APPLICABLE for question 3 and NO for all items in question 4; OR
  - Only Full Name in question 4.
  
- Continue completing the remainder of the form, i.e., Sections III thru VI in their entirety (questions 10 through 18), if the service provider is processing or maintaining sensitive PII. This is the case, if you checked:
  - YES for Social Security Number (SSN) in question 4; OR
  - YES for SSN or for Full Name in addition to one or more boxes in question 4.

- If you have questions or are unsure about whether or not you should complete the remainder of this form, please contact your Division ISM or the Privacy Program Office ([privacy@fdic.gov](mailto:privacy@fdic.gov)).

## SECTION III – DATA ACCESS AND SHARING

**10. In the table below, specify the systems/applications and parties (FDIC and non-FDIC) that will access or receive PII data as part of the outsourced service/project. (Check “No” or “Yes” for each category. For each category checked “Yes,” specify who will have access to, be provided with, or maintain the PII, what PII elements will be accessed/shared/maintained by them, how the access or sharing will occur, and the purpose and use of this PII.)**

PII Will Be Accessed By and/or Provided To:	Yes	No	If Yes, Explain How and Why the PII Will Be Accessed/Shared
<b>10a. FDIC Outsourced Service Provider (OSP) Staff; OSP Subcontractors; and/or OSP Systems</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>As noted previously, FDIC/DOF staff utilize LRGS’s Lexicon360.com portal to enter PII for the FDIC employee for relocation processing.</p> <p>A LRGS relocation counselor contacts the employee and obtains and validates the employee’s personal information. The representative may directly access employee PII for the purposes of providing relocation services for the relocating employee. The PII includes the data elements specified in question 4.</p> <p>The data is stored at the OSP and is not shared with third parties unless required for relocation processing or a legal process.</p> <p>LRGS follows generally accepted industry standards to protect PII during transmission and storage. Sensitive information (such as bank account information and SSN) entered into the Lexicon360° portal, is encrypted using secure socket layer technology ("SSL") and Secure HTTP. The data is retained at the OSP in a secure database. Employee documents, files, and data processing records are restricted on a “need to know” basis to the minimum number of staff required to manage the relocation program.</p>
<b>10b. FDIC Personnel and/or FDIC Systems/Applications</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>FDIC Employees</b> can update, change or delete their PII by accessing Lexicon360° and signing in using the username and password established during the initial consultation.</p> <p><b>FDIC DOF Travel staff</b> using a username and password have access to the PII in the website for relocation processing including establishing the account and audit inquiries.</p>
<b>10c. Individual Members of the Public (e.g., bidders, investors, borrowers, customers, etc.)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>10d. Other Non-FDIC Entities/ Parties and/or</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>LRGS may provide PII data to the following third parties as required:</p>

<b>Non-FDIC Systems/Applications</b>		<p>(1) Mortgage companies, credit bureaus, moving companies, rental companies, title companies, financial institutions and transport companies. The data shared for the purposes of supplying relocation services include: name, address, DOB, driver license, personal email address; personal phone number. The sharing method can be US Mail, email, or secure transmission.</p> <p>(2) As required by law for a judicial proceeding, court order, or legal process served on the LRGS website; the method of sharing will be determined by the request.</p> <p>Additionally, LRGS will disclose PII to governmental agencies or other companies when trying to protect against or prevent actual or potential fraud or unauthorized transactions or investigating fraud which has already taken place.</p>
<b>10e. Federal, State, and/or Local Agencies</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <p>LRGS may provide PII data to the following third parties as required:</p> <p>(1) Federal, state, and local governmental agencies for the purchase or sell of home, auto registration, or tax reporting for relocation services. The data shared would be: name, address, DOB, driver license, personal email address, and personal phone number. The sharing will occur via US Mail, email, or secure transmission;</p> <p>(2) As required by law for judicial proceeding, court order, or legal process served on the LRGS website. The method of sharing will be determined by the request.</p> <p>(3) When disclosure is necessary to protect the vendor's rights and/or comply with a judicial proceeding, court order, or legal process served on its website. The method of sharing will be determined by the legal action.</p> <p>Additionally, LRGS will disclose PII to governmental agencies or other companies when trying to protect against or prevent actual or potential fraud or unauthorized transactions or investigating fraud which has already taken place.</p>
<b>10f. Other</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**11. If data will be provided to, shared with, or maintained by non-FDIC entities (such as government agencies, contractors, or Outsourced Information Service Providers), have any of the following agreements been issued?**

Data Protection and/or Sharing Agreements	Yes	No
FDIC Confidentiality Agreement (Corporation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
FDIC Confidentiality Agreement (Individual)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-Disclosure Agreement (NDA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Memoranda of Understanding (MOU)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information Sharing Agreements (ISA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Authentication Risk Assessment	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Other Applicable Agreement(s)

(Specify: \_\_\_\_\_)

**If you answered NO to any item above, please provide additional information if available:** This is an outsourced service provider whose system/website does not interface with non-FDIC or FDIC systems.

## SECTION IV – NOTICE AND CONSENT

**12. Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?**

No. Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. ***(Explain why individuals are not able to opt out (either for specific data elements or specific uses of their data.):***

Yes. Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. An opt-out option is available to the employees through the Lexicon relocation counselor. Employees opting out may cause interruptions in, and/or loss of, relocation benefits due to the inability to provide third parties critical information. The employee can opt out by contacting the relocation counselor.

**13. If PII is being collected via a public-facing website and/or application as part of this outsourced service, has the Outsourced Information Service Provider posted any of the following types of privacy policies or Privacy Act notices?**

No

Yes *(If yes, check applicable box(es) below.)*

Link to FDIC Privacy Policy

FDIC Privacy Act Statement

Contractor Privacy Policy or Statement \*\*

No Privacy Policy has been posted

Not applicable

## SECTION V – DATA SECURITY AND ACCURACY

**14. Please assert what administrative procedures and technical safeguards are in place to protect sensitive PII data in the Outsourced Information Service Provider’s care. *[Provide the name of the Outsourced Service Provider and check all applicable box(es).]***

LRGS **[will go]** through the security review required by the FDIC’s Outsourced Information Service Provider Assessment Methodology to determine and/or verify their having appropriate physical, technical, and administrative security measures to safeguard FDIC-provided PII and other sensitive data. If it has gone through the Methodology, has it been approved?  NO  YES/PENDING

The FDIC conducts background investigations (BIs) on key Lexicon Relocation Government Services personnel and other applicable personnel prior to their beginning work on the contract.

LRGS is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of the Outsource Service Provider’s facilities, personnel, hardware, software and its security and privacy practices by either the FDIC information technology staff, the FDIC Inspector General, or the U.S. General Accountability Office (GAO). These inspections may be conducted either by phone, electronically or in-

person, on both a pre-award basis and throughout the term of the contract or task order, to ensure and verify compliance with FDIC IT security and privacy requirements.

Other (Explain any other administrative and/or technical safeguards in place to protect PII data in the Outsourced Information Service Provider's care.) ***Attach the Contract Clause Verification Checklist to the back of this form.***

**15. What are the procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date? [Check all applicable box(es) and insert the appropriate response and System/Project name.]**

Data is collected directly from individuals. As such, the FDIC and its vendors rely on the individuals to provide accurate data. The employee validates the PII with the OSP.

The vendor/contractor works with FDIC to verify the integrity of the data before, in conjunction with, and after inputting it into the system or using it to support the project. DOF TSS provides data to LRGS that is verified by the employee.

As necessary, a DOF TSS staff specialist checks the data for completeness by reviewing the information, verifying whether or not certain documents or data is missing, and as feasible, updating this data when required.

Other (Please explain.)

**16. In terms of assuring proper use of the data, please assert whether the following statements are true for the Outsourced Information Service Provider. (Check all applicable box(es) and insert the name of the Outsourced Information Service Provider and title of the firm's senior management official.)**

Within FDIC, the LRGS Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager (ISM) are collectively responsible for assuring proper use of the data. In addition, it is every FDIC user's responsibility to abide by FDIC data protection rules which are outlined in the FDIC's Information Security and Privacy Awareness training course which all employees take annually and certify that they will abide by the corporation's Rules of Behavior for data protection.

Additionally, the Outsourced Information Service Provider is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and the vendor has designated Vice President of Information Systems to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the data. All vendor personnel with access to the data are responsible for protecting privacy and abiding by the terms of their FDIC Confidentiality and Non-Disclosure Agreements, as well as the vendor's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data. (Refer to Section III of this Privacy Impact Assessment for more information on data access criteria.)

The Outsourced Provider must comply with the Incident Response and Incident Monitoring contractual requirement.

None of the above. (Explain why no FDIC staff or Outsourced Information Service Provider personnel have been designated responsibility for assuring proper use of the data.)

## **SECTION VI – DATA RETENTION AND DISPOSAL**

**17. Where will the Outsourced Service Provider store or maintain the PII data identified in question 4? Describe both electronic and physical storage repositories, as applicable.**

The data is stored and maintained at the network server level, database level, or local workstations of the vendor.

**18. Specify the period of time that data is retained by the Outsourced Service Provider and the specific procedures for disposing of or returning the data at the end of the retention period or contract, whichever is first.**

LRGS will retain the information in accordance with its contractual agreement with FDIC and until the account is cancelled by the FDIC. Upon termination of the service, the Program Manager will contact LRGS to advise them to dispose of FDIC data in accordance with the contractual agreement (excerpts below). However, data may be retained and used as necessary to comply with LRGS legal obligations, resolve disputes, and enforce its agreements.

**Per the Contract Clauses:**

### **7.3.2-37 - Audit of Records - July 2008**

Retention Requirement. Contractor must retain the materials described in paragraphs (b) and (c) above for three (3) years following final payment under this contract, or for any longer period required by statute or another clause in this contract. Contractor must make the materials available to the FDIC for audit, examination and reproduction, at reasonable times during the retention period. Contractor must also provide the FDIC with working space at its facilities to conduct the audit and examination. If this contract is terminated, completely or partially, Contractor must maintain the materials described in subparagraphs (b) and (c) above for three (3) years following any final settlement Contractor must maintain, and make available to the FDIC, records relating to appeals under the "Disputes" clause of this contract, or to claims or litigation arising under or from this contract, until the appeals, claims or litigation are resolved.

### **Section C. Section 3.1 General:**

The Contractor must maintain all receipts and supporting documentation for all expenses billed under the contract. This includes those expenses incurred by the relocating employee and claimed through the contractor. All documentation must be immediately available online for the Program Office to view for the duration of the contract. Following contract close out all files will be available to the Program Office within 72 business hours following receipt of written request for six years following the completion of the last relocation activity for eachfile.