

# PRIVACY IMPACT ASSESSMENT

## Specialized Tracking and Reporting System (STARS)

June 2008

FDIC Internal System

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## System Overview

The FDIC uses the Specialized Tracking and Reporting System (STARS), a customized tracking and workflow system designed for use by the Division of Depositor and Consumer Protection (DCP) to track incoming correspondence and telephone calls from consumers and bankers that are not examination related. The STARS system contains two on-line Web surveys (Consumer Satisfaction Questionnaire and Customer Satisfaction Survey) as well as the publicly accessible corporate web form "Customer Assistance Form.

The Customer Assistance Form (CAF) is used by the public to submit their complaints or inquiries regarding various banking issues and deposit insurance. Once the consumer completes the form and submits their request, it is routed to the STARS mailbox. Once the email is received and verified by DCP personnel, a record is created, and the incoming CAF submission is attached to the record.

Correspondence can be received from consumers via the Customer Assistance Form (CAF) or email which is reviewed and then saved to STARS. Correspondence may also be received through hardcopy mail or faxes, which are then scanned to create an electronic image and subsequently linked to a STARS record. Additionally, telephone calls received directly by the Consumer Response Center (CRC) or from the FDIC Call Center that require a CRC subject matter expert, are also entered into STARS.

## Personally Identifiable Information (PII) in STARS

STARS may contain the following data elements pertaining to the individual making the request: full name, home address, email address, title, organization, and telephone number. STARS does not have any fixed database fields to record other types of PII (i.e., Social Security Number, personal bank account or financial information, date of birth, etc.). However, DCP personnel are tasked with imaging incoming paper correspondence and attaching emails or input from the CAF into STARS. While correspondents with the FDIC are never asked or required to submit this PII information, individuals may include such data elements along with their CAF. In such cases, the FDIC may not be able to prevent a submitter from including additionally sensitive PII in the correspondence.

## Purpose & Use of Information in STARS

The data is both relevant and necessary for the purpose for which it was designed, which is to track and respond to correspondence received from consumers related to banks and financial institutions. Any PII or sensitive information included in incoming correspondence is voluntarily submitted by the consumer. However, if a consumer fails to provide the adequate information, the FDIC may be unable to provide a sufficient answer or solution regarding that individual's complaint/inquiry.

## Sources of Information in STARS

The system contains the complainant's incoming correspondence, the Customer Assistance Form (CAF), internal codes to identify complainant's concerns, information concerning the bank in question (bank name, address, class code, supervisory region) and internal tracking dates regarding action(s) taken on the record.

STARS may contain consumer correspondence that may have been referred from another federal regulatory agency. For example, if a consumer writes to the Office of the Comptroller of the Currency (OCC) about a financial institution supervised by the FDIC, the OCC would forward the incoming consumer correspondence to the FDIC for handling and response. Additionally, STARS may contain correspondence from state and local banking agencies that refer consumer correspondence to the FDIC.

Supplementary data in STARS may be pulled from the Structure Information Management System (SIMS), which provides information regarding the financial institution identified by the complainant. SIMS is the FDIC's system of record for the compliance and examination program and is used by compliance field supervisors, examiners, review examiners, and FDIC policy staff. Bank information pulled from SIMS is publicly available and does not contain sensitive data.

## Notice & Consent

Although the consumer cannot opt-out of providing the PII, which is needed to respond back to the requestor (name, address, email, etc.), the requestor can indicate in the incoming correspondence that they do not want their correspondence shared with anyone outside the FDIC, (i.e., with the financial institution in question).

## Access to Data in STARS

Authorized FDIC employees within the Division of Depositor and Consumer Protection (DCP) have access to STARS for the purposes of performing their daily job functions. These employees include those in the Deposit Insurance Outreach section, review examiners, and field staff who require access in order to respond to consumer complaints and inquiries, either in writing or via the telephone.

Access to STARS requires management approval, as well as setting up the internal user profiles through the applications administrative table. Users are limited by predetermined roles and responsibilities to viewing only data pertaining to their business processes.

## Data Sharing

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

System Name	System Description	Type of Information Processed
<b>Structure Information Management System (SIMS)</b>	This system maintains current and historical non-financial data for all institutions. This data is retrieved by AIMS to identify the current assessable universe for each quarterly invoice cycle. SIMS obtains the number of complaints or inquiries submitted against a specific bank from STARS.	Non-PII data related to banks

## Data Accuracy in STARS

The STARS application relies on the accuracy of the information received from complainants. As such, it is the responsibility of the individual submitting the complaint to the FDIC to ensure that all information contained in his/her correspondence is accurate and up to date. STARS does not have any built-in mechanisms to check the accuracy of the data submitted. Data integrity checks may be completed by DCP staff to ensure that required fields in STARS are filled in and not left blank.

## Data Security for STARS

General access controls, firewalls, and intrusion-detection systems are used to prevent unauthorized access and monitoring of data contained in STARS. Controls are in place to ensure that only those authorized individuals with a "need to know" the information in STARS have access to the data.

## System of Records Notice (SORN)

STARS operates under the FDIC Privacy Act SORN FDIC 30-64-0005, *Consumer Complaint and Inquiry 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.



