

# PRIVACY IMPACT ASSESSMENT

## Board of Directors' Records (BODREC)

January 2015

FDIC Internal System

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## System Overview

The Federal Deposit Insurance Corporation (FDIC) is an independent agency whose main objective is to maintain stability and public confidence in the nation's financial system by: insuring deposits, managing receiverships, and examining and supervising financial institutions for safety and soundness and consumer protection. Within the FDIC's Legal Division, the Executive Secretary Section (ESS) provides direct administrative and legal support to the FDIC Board of Directors. In this capacity, ESS provides the logistical support for Board meetings, records the minutes, and maintains the official records of the Board. The Board of Directors' Records (BODREC) solution is being used to upload and house board meeting minutes and supporting documents dating back to the 1930s. Currently these records are maintained in FDIC's Board Meeting Minutes (BODMIN) tracking system and Consolidated Document Information System – Board of Directors Minutes and Cases (CDIS-SUPER). BODREC implements a solution to replace the existing outdated systems, BODMIN and CDIS-SUPER, to store and retrieve documents from Board of Directors meetings and contain them within FDIC's Enterprise Secured Repository/Documentum. Documentum is a unified Content Management System that provides tools for working with many types of content (i.e. documents, drawings, scanned images, and hard copies) into a single repository that can span multiple departments and functional areas within an organization. BODREC will migrate data from BODMIN and CDIS-SUPER to Documentum, utilizing the Captiva interface which establishes a cabinet and folder structure within Documentum.

## Personally Identifiable Information (PII) in BODREC

The Executive Secretary Section (ESS) creates and compiles FDIC Board of Directors meeting minutes and other related documentation in order to accurately record the discussions that take place during Board meetings. Content recorded from Board meeting discussions, and supporting documentation may contain agency-sensitive and personally sensitive information, to include employee disciplinary data or bank closing-related information.

## Purpose & Use of Information in BODREC

ESS creates and compiles FDIC Board of Directors meeting minutes and other related documentation in order to accurately record the discussions that take place during Board meetings. These documents contain important precedent and historical information that can be used in the Board's subsequent decision-making process.

## Sources of Information in BODREC

The originating sources of data in the system include: CDIS-SUPER, which does not contain or provide data elements to BODREC. However, documents pulled from CDIS-SUPER include meeting minutes and jackets (jackets provide more detailed information). Another source of information is BODMIN which also provides no data element but instead provides a synopsis of each agenda item that the FDIC/RTC/ Board and committees pull in PDF form.

## Notice & Consent

Individuals may not opt-out of providing the information. BODREC is used for storage of Board Meeting documents that are essential to conducting FDIC business. The Board records stored in BODREC are not collected directly from individuals, but recorded during Board meetings that include relevant supporting documents. Some of these documents may hold personally sensitive or business/agency sensitive information captured during Board meetings; thus, it is not possible to "opt-out" on an individual basis.

## Access to Data in BODREC

Currently, approximately 15 internal FDIC Legal staff have authorized access to the board material, and include:

Legal Division, Executive Secretary Section (ESS): ESS staff utilize BODREC to produce, edit, and store Board of Director meeting minutes and documents relevant to Board of Directors' Meetings; and search for relevant information from board meetings at the request of the Board or other executives.

Legal Division, Information Technology Unit (LITU): — LITU Staff have access to the material stored in BODREC in order to assist with uploading of information and to conduct other system administration functions such as adding users to the system, system upgrades, and troubleshooting user reported problems. As such, they are able to view the BODREC data.

## Data Sharing

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

No other systems currently shares or has access to the data within BODREC.

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

## Data Accuracy in BODREC

BODREC data is reviewed for accuracy, timeliness, and completeness by an authorized FDIC BODREC team member. Access to BODREC material is restricted and role-based according to job function and contingent on a business need to know. All users must have the approval by the Program Manager in the FDIC Legal Division

in order to gain access to the data. BODREC has controls in place to prevent the misuse of data by those having access. Such security measures and controls consist of: user identification and authentication, network/database permissions, and software controls to complete the Corporation's annual Information Security and Privacy Awareness Training, which includes the Rules of Behavior to which all users must adhere. This training also states specifically the rules for protecting and preventing the compromise and misuse of sensitive information and PII.

## Data Security for BODREC

The BODREC solution has technical security controls in place in accordance with the National Institute of Standards and Technology (NIST) Special Publication (SP) 8-00-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations. These security controls include, but are not limited to, access controls, firewalls, network login credentials, data permissions and intrusion-detection systems to prevent unauthorized monitoring.

## System of Records Notice (SORN)

BODREC 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](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.

