

PRIVACY IMPACT ASSESSMENT

Legislative Information Tracking System (LEGIT)

April 2007

FDIC Internal System

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System Overview

The FDIC Office of Legislative Affairs (OLA) serves as the agency's liaison to the U.S. Congress and closely monitors and responds to legislation important to the FDIC. When members of Congress and/or their staff would telephone the FDIC, their inquiries would be handled manually by OLA staff using a paper-based system. To aid in this process, OLA began using the Legislative Information Tracking (LEGIT) system, an electronic application, for storing and tracking telephone inquiries from members of Congress, their staff, and congressional committees. LEGIT contains a caller inquiry tracking system that allows OLA staff to create records of inquiries made by congressional staff, along with their business-related information. This includes name, telephone number, the office for whom the staff work, and the subject of the inquiry.

While most telephone inquiries from congressional staff request information regarding policy issues, matters of law or banking statistics, upcoming hearings and committee requests for data, some inquiries may deal with specific constituent problems. When a congressional inquiry involves constituent problems with FDIC or the banks regulated by the FDIC, the congressional staff may describe the inquiry in general terms. Most such questions are resolved by directing staff to the appropriate public source of information regarding asset sales, lien clearances, or the appropriate federal regulator for a particular institution. When a constituent requests assistance in dealing with the FDIC or an insured depository institution, LEGIT may acquire personal information about the constituent who has requested assistance from the congressional office; they may include the individual's name, address, telephone number, and a brief summary of the problem as reported by the OLA staff from information provided by the congressional staff.

Although some personal information may be maintained in the LEGIT application, records in the system are not set up to sort the data by Social Security Number (SSN), full, phone number, or other personally identifiable information. LEGIT is designed to sort and retrieve records by: date that the incoming call was received by FDIC, name of member of Congress whose office made the call, name of the congressional staff that called, or last name of the constituent on whose behalf the inquiry was made. In addition, records can be sorted by status (Open/Closed).

Personally Identifiable Information (PII) in LEGIT

The LEGIT application was not designed as a collection system for personally identifiable information and does not solicit data from the public. Much of the data contained in LEGIT describes obtaining and/or organizing information for congressional staff from publicly available information sources, ranging from statutory citations to how to find FDIC documents in electronic or printed form and contacting them when the information is ready. However, inquiries on behalf of constituents may contain the constituent's full names, addresses, telephone numbers, business titles, and other personal information.

As stated above, personal information provided to the FDIC by the congressional staff on behalf of an individual (such as SSN or full name of the individual) are not searchable sorting terms for the LEGIT application.

Purpose & Use of Information in LEGIT

The LEGIT application carries out the processing and tracking of congressional staff calls placed to the FDIC Office of Legislative Affairs. Data in the system is used to respond to those inquiries. The system was not designed to collect personal information; however, certain personally identifiable information (i.e., names, addresses, business titles, and other personal information) obtained from congressional staff are necessary in order to respond to the callers.

Sources of Information in LEGIT

Congressional staff contact the FDIC OLA via telephone with inquiries related to policy issues, matters of law or banking statistics, upcoming hearings and committee requests for data, or specific constituent problems. OLA staff obtain information from congressional staff and enter the data directly into the LEGIT system.

Notice & Consent

The LEGIT application was not designed to collect and sort personally identifiable information. Once a call is placed to the FDIC, however, it is not possible to opt out. Facts are recorded as related to the OLA staff by congressional staff. The data submitted is used to provide assistance to the individual only for the specific problem cited by the individual.

Access to Data in LEGIT

Users of the LEGIT system include FDIC employees from the Office of Legislative Affairs (OLA) who manage the system and provide all data entry in the system. FDIC subject matter experts (SMEs) who are consulted in preparing a response to the congressional inquiry on behalf of a constituent do not have access to the LEGIT system. When the assistance of an SME is required, the specific data is extracted from the LEGIT system by OLA staff and related to the SME in the course of resolving that inquiry.

Data Sharing

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

No other systems have access to or share data in the LEGIT application.

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

Data Accuracy in LEGIT

Data in LEGIT is collected when members of Congress and/or their congressional staff make inquiry calls to the FDIC. It is up to the individual(s) requesting FDIC assistance to ensure that the information and material they are providing are complete and accurate. Therefore, it is the responsibility of individual members of Congress and/or their staff to verify and ensure the accuracy of the data provided to OLA staff for use in LEGIT. As OLA staff do not directly engage with members of the public whose data is related to them via the congressional staff making the inquiry, it is impossible for OLA staff to verify and/or test the accuracy of any personally identifiable information provided to them. If in the process of preparing a draft response to an inquiry, the FDIC subject matter expert discovers that incomplete information has been supplied, OLA will contact the congressional office making the inquiry and inform them of the need for additional data.

Data Security for LEGIT

Unauthorized browsing and other misuse of data is limited by restricting the users of LEGIT to a small number of FDIC OLA personnel who maintain access to the system. The ability to modify or delete records in the system are restricted to only those users with the authorized access level. Prior to access to the system, FDIC staff must receive a certificate for use of the database software and have specialized database software installed on their workstation. The certificate requires periodic renewal without which access to the software is denied.

System of Records Notice (SORN)

LEGIT operates under the FDIC Privacy Act SORN 30-64-0030, *Legislative Information Tracking System 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 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.

