Supervisory Information System – Examiner View (SIS-EV)

Privacy Impact Assessment (PIA)

Version 1.2

September 10, 2010

Prepared by:

Information Risk Management

NOTE

This document was prepared in support of the system's Certification and Accreditation effort. The document was developed in accordance with, or following the guidance contained in, the following:

- *The Privacy Act of 1974* (Public Law 92-132, 5 U.S. C. 552a).

- *Federal Information Security Management Act of 2002* (Title III of P.L. 107-347).

- Section 208 of the *E-Government Act of 2002* (Public Law 107-347, 44 U.S.C. Ch 36), April 17, 2003.

- Office of Management and Budget (OMB) Memorandum M-03-18, *Implementation Guidance for the E-Government Act of 2002*, August 1, 2003.

- OMB Memorandum M-03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, September 26, 2003.

- OMB Memorandum M-06-15, *Safeguarding Personally Identifiable Information*, May 22, 2006.

- OMB Circular No. A-130**,** Revised, (Transmittal Memorandum No. 4)**:** *Management of Federal Information Resources*, 28 November 2000.

- Computer Matching and Privacy Act of 1988 (Public Law 100-503).

- Department of the Treasury Publication, TD P 25-05, *Privacy Impact Analysis Manual*, dated July 2006

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PRIVACY IMPACT ASSESSMENT

1. SYSTEM IDENTIFICATION

1.1   Name of System, Project, or Program:

Supervisory Information System-Examiner View (SIS-EV)

1.2   Responsible Organization

Midsize/Community Bank
Office of the Comptroller of the Currency (OCC)
250 E Street, Southwest
Washington, DC 20219.

1.3   Information Contact(s)

Names of persons knowledgeable about the system, the system and data owner, security personnel, etc.:

Key System Contacts (include name, phone, and email):

	Name	**E-mail**	**Phone**
System Owner	**Don Titzman**	Don.Titzman@occ.treas.gov	874-4429
ITS Project Manager	**Cathy Michaely**	Cathy.Michaely@occ.treas.gov	874-5491
ITS Backup Project Manager	**Tamara Mahoney**	Tamara.Mahoney@occ.treas.gov	874-5059
Information System Security Manager/ System Administrator	**Don Ewan**	Donald.Ewan@occ.treas.gov	874-4729
Backup System Administrator	**Siva Karuppiah**	Siva.Karrupiah@occ.treas.gov	927-2810
Authorizing Official	**Jennifer Kelly**	Jennifer.Kelly@occ.treas.gov	874-5020
Chief Privacy Officer	**Roger Mahach**	Roger.Mahach@occ.treas.gov	874-7276

1.4   Security Categorization

The system was assessed in its Security Categorization Report (SCR) as **MODERATE** under guidance contained in Federal Information Processing Standards (FIPS) Publication (PUB) 199, *Standards for Security Categorization of Federal Information and Information Systems*, December 2003, as follows:

Information Type	Confidentiality	Integrity	Availability
Record Retention	Low	Low	Low
Financial Sector Oversight	Moderate	Low	Low
Legal Prosecution/Mitigation	Low	Moderate	Low
Inspections and Auditing	Moderate	Moderate	Low
Overall Per Category	**Moderate**	**Moderate**	**Low**
System Overall	**MODERATE**		

1.5   System Operational Status

The System is currently **operational.**

1.6   General Description/Purpose

SIS-EV is a software application designed by the OCC to assist bank examiners in preparing and conducting supervisory activities for financial institutions. It is part of the SIS suite of software that supports the work efforts of OCC bank examiners and management personnel. SIS-EV, which is a Windows .Net application, is used to support the Assistant Deputy Comptrollers (ADCs) and Field Office Analysts in the management of the institutions and bank examiners assigned to their office.

1.7   System Environment

SIS-EV is continuously connected and available on-line and off-line, meanings that the user's computer can either connect to or disconnect from the network to use the application and update data. In order to maximize the level of "code re-use" for the SIS applications, an architecture that supports both on-line and off-line applications has been implemented. All SIS-EV servers and users' computers

are connected to the OCC intranet inside of a firewall, except in the case of incoming Virtual Private Network (VPN) connections. This application employs:

- *Server Operating System:* Windows Server 2003 or later
- *Client Operating System:* Windows 2000 Professional or later
- *Database:* Sybase Adaptive Server Anywhere (ASA)
- *Web server for Business Logic:* Internet Information Server (IIS)
- *Network protocol:* Transmission Control Protocol/Internet Protocol (TCP/IP)
- SQL Server (used only by SIS-Reports)

1.8   Future Changes to SIS-EV.

No future modifications are planned for SIS-EV.

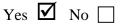**1.9   System Interconnection/Information Sharing**

SIS-EV information is provided to the Federal Reserve Bank (FRB) and Federal Deposit Insurance Corporation (FDIC) continuously on a daily basis.
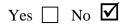
2. PRIVACY IMPACT ASSESSMENT

2.1   Privacy Assessment

The following paragraphs detail the Privacy Assessment applicable to the *SIS-EV*.

2.1.1 Does this system collect any personal information in identifiable form about individuals?

Yes ☑   No ☐

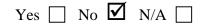**2.1.2 Does the public have access to the system?**

Yes ☐   No ☑

2.1.3 Has a PIA been completed in the past?

Yes ☑   No ☐

2.1.4 Has the existing PIA been reviewed within the last year?

Yes ☐   No ☑   N/A ☐

2.1.5 Have there been any changes to the system since the last PIA was performed?

Yes ☐   No ☑   N/A ☐

2.2   Data in the System/Application

2.2.1 What elements of PII are collected and maintained by the system?

Information about individuals is collected during the bank examination process. That information could include names, addresses, banking relationships and other information the bank may have collected in the course of doing business.

2.2.2 Why is the information is being collected?

The primary business function is the acquisition and recordation of results of supervisory review of financial institution activities.

2.2.3 What are the sources of the information in the system?
The information sources are from bank loan information and bank contact list.

2.2.4 How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?

The data is verified as a part of the bank examination review process.

2.2.5 Who will have access to the data and how is access determined?
The users are: assigned bank examiners, supervisor office personnel and headquarter analysts. The access is determined by the mission needs and assigned by the SIS-EV system administrators and examiner supervisors.

2.2.6 Describe the administrative and technological controls that are in place or that are planned to secure the information being collected.
Administrative controls are conducted by SIS-EV system administrators via a specific administration module.
Technological controls base on Windows Active Directory, RSA token, firewall, and Intrusion Detection System and other selected controls during the 2010 recertification and accreditation.

2.2.7 What opportunities will individuals have (if any) to decline to provide information or to consent to particular uses of the information?

The information was provided to the bank as a part of the business of banking. Individuals have the opportunity of declining to offer the information to the bank as it is requested by the bank. Information is subsequently provided to examiners as a part of the examination process.

2.2.8 What is the life expectancy of the data and how will it be disposed of when it is no longer needed?
Currently, there is no data being disposed. The system personnel is in negotiation with Record Management group.

2.2.9 Is the system owned, operated, and maintained by a contractor?

Yes ☐ No ☑

2.3   System of Records (SOR) Notice

Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?

Yes ☐ No ☑

2.4   Certification and Accreditation

Has the system been certified and accredited within the last three years?

Yes ☑ No ☐

Date ATO granted: **July 28, 2010**