Supervisory Information System – Examiner View (SIS-EV)

Privacy Impact Assessment (PIA)

Version 1.2

September 10, 2012

Prepared by:
Security and Compliance Services
# Document Change Control

<table>
<thead>
<tr>
<th>Version</th>
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<td>1.2</td>
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<td>Tamara M.</td>
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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:

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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 (Midsize-SI)
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.:

See PTA (Privacy Threshold Analysis) document
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:

<table>
<thead>
<tr>
<th>Information Type</th>
<th>Confidentiality</th>
<th>Integrity</th>
<th>Availability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Record Retention</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>Financial Sector Oversight</td>
<td>Moderate</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>Legal Prosecution/Mitigation</td>
<td>Low</td>
<td>Moderate</td>
<td>Low</td>
</tr>
<tr>
<td>Inspections and Auditing</td>
<td>Moderate</td>
<td>Moderate</td>
<td>Low</td>
</tr>
<tr>
<td><strong>Overall Per Category</strong></td>
<td>Moderate</td>
<td>Moderate</td>
<td>Low</td>
</tr>
<tr>
<td><strong>System Overall</strong></td>
<td><strong>MODERATE</strong></td>
<td></td>
<td></td>
</tr>
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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.

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 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**