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Privacy Impact Assessment Update

MATTERS MANAGEMENT SYSTEM

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DOCUMENT PURPOSE

The Privacy Impact Assessment or “PIA” provides the public with information about the Consumer Financial Protection Bureau’s (“CFPB” or “Bureau”) collection and use of personally identifiable information (“PII”). While PIAs are reviewed every three years to ensure accuracy, periodic changes to information systems may warrant more frequent notification. This document alerts the public to any changes to an existing CFPB IT system that creates new privacy risks. In general, such changes are minor. In cases where significant changes to a system occur, a new PIA may be drafted and published.

PROJECT / SYSTEM NAME: **Matters Management System**

PIA PUBLISH DATE: May 24, 2012

UPDATED / REVISED PIA SECTIONS:

- Section 1.0 – Purpose of Collection
 - Section 2.0 – Openness and Transparency
 - Section 3.0 – Data Minimization
 - Section 4.0 – Limits on Uses and Sharing of Information
 - Section 5.0 – Data Quality and Integrity
 - Section 6.0 – Security
 - Section 7.0 – Individual Participation
 - Section 8.0 – Awareness and Transparency
 - Section 9.0 – Accountability and Auditing
 - Appendices (if applicable)
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SECTION 3.0 DATA MINIMIZATION

The CFPB will limit the collection of PII to what is needed to accomplish the stated purpose for its collection. The CFPB should keep PII only as long as needed to fulfill that purpose.

3.8 What kinds of reports can be produced on individuals? Will the data included in the reports produced be made anonymous?

Updated Response: The CFPB may generate reports from the MMS that identify matters related to specific CFPB staff, the subject of the matter, or the matter type. Such reports include lists of names and contact information of individuals involved in a matter and CFPB employees. In addition, such reports may include sensitive non-identifying information about the status of a matter.

The Bureau distributes reports derived from MMS internally only to employees with a bona fide need for such reports to carry out their assigned job responsibilities.

Externally, the Bureau discloses reports on a limited basis, as required or necessary, to other state and federal government agency employees whose job functions allow them to review reports generated about a CFPB matter. Additionally, the Bureau's Legal Division may create service lists from the MMS. These lists include the names and mailing address of individuals who will be served by the Bureau with court documents and will be publicly released.

Section 4.2 of this PIA and the related SORNs, outline the ways the CFPB may share information from this system with other federal and state agencies.

SECTION 4.0 LIMITS ON USES AND SHARING OF INFORMATION

The CFPB will publish a notice about how we plan to use and share the PII that we collect from you. We will only share your PII in ways that are compatible with the notice or as stated in the Privacy Act.

4.2 Will the CFPB share any of the information with other individuals, Federal and/or state agencies, or private sector organizations? If so, how will the CFPB share the information?

Updated Response: Yes. The CFPB may share PII in reports about matters generated by the system with individuals at other federal and state agencies and with non-CFPB individuals associated with a particular matter if such sharing is warranted. Such sharing will only occur through secure channels, such as the Bureau's shared space on the Office of Management and Budget's ("OMB") MAX Portal tool¹ or similar secured portals, or through encrypted email.

In the case of service lists or similar reports generated from the system for the purpose of sharing with the public, such sharing will occur through publicly available means, such as the Bureau's website, consumerfinance.gov.

The CFPB has outlined the ways in which information from the MMS may be shared under the "Routine Uses" section of the related SORNs for the system.

4.4 Will the project interact with other systems, whether within the CFPB or outside of the CFPB? If so, how?

Updated Response: At this time, the MMS does not directly connect to systems outside of the CFPB. However, reports generated by the system, or information that is maintained in the system may be uploaded into a shared space the CFPB

¹ See Section 4.4 for more information.

shares maintenance responsibility for, in conjunction with the Federal Trade Commission (“FTC”), through the OMB MAX Portal’s “Federal Community”² in order to facilitate joint investigations and other related activities. In general, such reports will not contain PII, with the exception of names of CFPB employees involved in an investigation, supervision activity, or other matter, on behalf of the Bureau as part of their official duties.

Within the CFPB, the system will connect to the Bureau’s shared network drive in order to access documents and other files associated with a particular matter. This connection exists because the MMS does not serve as a document repository or document management system for documents associated with matters in the system. The system will also connect to the Bureau’s email server for the purposes of calendar and email synchronization, and to the Bureau’s Staff Directory for managing CFPB employee contact information.

² The OMB MAX Federal Community is a comprehensive collaboration, information sharing, document management, and knowledge management capability hosted and managed by the Office of Management and Budget. Use is restricted to employees of federal agencies and sponsored state agency users. The community allows for secure collaboration spaces and facilitates information sharing between agencies. Information housed in the Federal Community remains the property of the agency which uploads it.