

Consumer Financial Protection Bureau

Data Intake Group Charter

I. Purpose of the Data Intake Group

The ability to intake and analyze information is fundamental to the Consumer Financial Protection Bureau's mission. This analysis informs Supervision, Enforcement and Fair Lending decisions, guides policy development and rulemaking, provides critical information about the condition of consumer financial markets, and supports decision-making about Bureau internal policies and operations. The DIG is established in accordance with the *Policy on Information Governance*.

The Data Governance Board (DGB) formed the Data Intake Group (DIG) as an operational committee to 1) coordinate Bureau data intake compliance and 2) ensure that the Bureau is responsible for its intake of information.

II. Membership

A. Members

The DIG consists of the following members:

- A representative from the Data Policy Team
- A representative from the Legal Division
- A representative from the Privacy Team
- A representative from the Cybersecurity Team
- A representative from the Enterprise Data Team
- A representative from the Paperwork Reduction Act Office
- A representative from the Records Management Office
- A representative from the Freedom of Information Act Office

B. Delegates

DIG members may, at their own discretion, have a delegate from their office or Division attend a meeting in their place. Delegates will have the same authority as the member they are representing. The DIG may invite other Bureau stakeholders to attend meetings or engage in relevant topics.

C. Membership Selection

Members shall be identified by senior leadership in the areas identified above. Leadership may change their choice of appointed representative at any time by notifying the Data Governance Board or Data Policy Team.

III. DIG Coordinator

The Data Policy Team will appoint a DIG Coordinator to facilitate Bureau data intakes and manage the DIG process. The DIG Coordinator is responsible for determining the appropriate path by which the Bureau may consider intaking information, including whether proposed intakes:

- Require DIG review
- May be brought in under a delegation of authority
- May be brought in under an exception to, or are otherwise exempt from requirements
- May be brought in after a determination that compliance assessments and requirements have otherwise been completed

The DIG Coordinator, with support from the Data Policy Team, is responsible for:

- Scheduling regular meetings
- Planning meeting agendas
- Working with staff who would like to request data intakes
- Compiling and sharing materials for DIG member review, prior to the meeting
- Facilitating the collection and submission of recommendations from each DIG member
- Facilitating the approval, and/or escalation to the DGB, as necessary
- Recording all decisions, and
- Maintaining relevant DIG documentation (e.g. meeting presentations, minutes, recommendations) in a central location

IV. Responsibilities of the DIG

Facilitated by the Data Policy Team, the DIG is responsible for assessing whether and how data should be brought into the Bureau in accordance with the *Policy on Information Governance*, other relevant Bureau policies, and appropriate legal concerns. As part of this assessment, the DIG will provide recommendations to the CDO.¹

Each DIG member is responsible for providing timely review, feedback and recommendations of data intakes brought before the DIG.

V. DIG Process

¹ Per the *Policy on Information Governance*, the Chief Information Officer (CIO) may for operational purposes, and at his/her discretion, delegate information governance oversight authority to individuals or to operational committees. The CIO has delegated the authority to make data intake decisions to the CDO. The CIO may still exercise his/her information governance oversight authority at his/her discretion.

A. Meeting Schedule

The DIG will generally meet no less than once a month. Meetings shall be held at a time convenient to as many members as possible.

B. Required Reviews

If the DIG Coordinator, Data Policy Team, or the CDO determines that a DIG review is required, relevant information about the proposed intake is provided to the DIG for review. The DIG reviews generally include:

- A review for compliance with applicable laws and regulations.²
- A review for compliance with applicable Bureau Policies, Standards, Procedures, and Processes.
- A review of proposed plans for each data intake request, including; the purpose, ownership and access, storage, intended use, method of intake and whether the information needs to be de-identified before its proposed use.
- A written recommendation.

C. Required Recommendations and Approval

For each data intake for which DIG review is required, DIG representatives provide their recommendation as to whether or not the Bureau should intake the data. These recommendations may include reservations or conditions and should be conducted in a timely manner.

Each DIG member is responsible for conducting an independent review of intakes under the laws, regulations, and Federal policies that govern their respective areas of compliance. Individual DIG members, unless otherwise delegated, do not have the individual authority to approve an intake of information into the Bureau.

During the CDO review process, the CDO may request more information from the DIG, or discuss the proposed intake with the Data Governance Board or other advisors. The CDO ultimately approves or rejects the proposed data intake request, and may indicate reservations, require conditions of approval or restrictions on use.

D. Timing of Data Intake or Collection

Data subject to review by the DIG may not be brought into the Bureau or collected on behalf of the Bureau until it is approved. In extenuating circumstances, the CDO may approve or reject a

²These include, but not limited to, the Dodd-Frank Wall Street Reform and Consumer Protection Act, Paperwork Reduction Act, E-Government Act, Privacy Act, Federal Information Security Management Act, Federal Records Act, and Freedom of Information Act.

given data intake without DIG review. The CDO informs the Data Policy Team, who in turn informs the DIG, of any such decision, and any such data intake may be subject to post-hoc DIG review.

E. Documentation and Reporting Requirements

The DIG Coordinator, with support from the Data Policy Team, will maintain and circulate, as needed, documentation about DIG recommendations and decisions.

The Data Policy Team will provide read-outs to the DGB on DIG activity generally on a quarterly basis, but no less than annually. These read-outs will include also summaries of determinations, when requests have been received and approved by the DIG Coordinator, CDO, for intakes of information other than through the DIG process.

VI. Revision History

Action	Date	Approval Authority
Initial version	June 25, 2015	Ashwin Vasan, CIO
Revised version	November 14, 2017	Linda Powell, CDO

VII. Signature and Effective Date

Approved: 

Date: 2/14/2018

Linda Powell, Chief Information Officer

This Charter is effective when signed.