

PIA Advisory Committee Application Manager (ACAM) v.1

Does the CFPB use the information to benefit or make a determination about an individual?

Yes

What is the purpose?

To collect, organize, and review applications for positions on advisory committees.

Are there controls to enforce accountability?

Yes, all standard CFPB privacy protections and security controls apply.

What opportunities do I have for participation?

Appropriate opportunities for notice, consent, access, and redress.



Consumer Financial
Protection Bureau

Overview

The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Act”), Public Law No. 111-203, Title X, established the Consumer Financial Protection Bureau (“CFPB” or “Bureau”). The CFPB implements and enforces Federal consumer financial laws consistently to ensure that consumers have access to markets for consumer financial products and services, and that such markets are fair, transparent, and competitive. Section 1014(a) of the Act and the Federal Advisory Committee Act (“FACA”) as amended, 5 U.S.C., App. 2,¹ establish the Consumer Advisory Board (“CAB”) to “advise and consult the Bureau in the exercise of its functions under the Federal consumer financial laws.”² In addition to the CAB, the Bureau has established three additional advisory committees pursuant to the executive and administrative powers conferred on Bureau by Section 1012 of the Dodd-Frank Act, which are the Academic Research Council (“ARC”),³ the Community Bank Advisory Council (“CBAC”),⁴ and the Credit Union Advisory Council (“CUAC”).⁵ Each of these additional councils have a specific area of focus but they have all been established to support the primary goal of the CAB which is to “provide information, analysis, and recommendations to the Bureau.”⁶ The board and councils will herein be collectively referred to as the advisory committees or committees.

The Advisory Board and Councils (ABC) group within the Consumer Financial Protection Bureau (“CFPB or Bureau”) is responsible for maintaining the engagement and relationship with all formal advisory committees. Each year, the ABC group collects and reviews around two hundred applications for positions for each advisory committee from external applicants. The committees are comprised of academics, non-profit and finance industry subject matter experts, and other industry representatives who advise and consult on the Bureau’s operations. Each

¹ “Consumer Financial Protection Bureau Charter of the Bureau’s Consumer Advisory Board”, March 19, 2019, found [here](#).

² Id.

³ “Consumer Financial Protection Bureau Charter of the Bureau’s Academic Research Council”, March 19, 2019, found [here](#).

⁴ “Consumer Financial Protection Bureau Charter of the Bureau’s Community Bank Advisory Council”, March 19, 2019, [here](#).

⁵ “Consumer Financial Protection Bureau Charter of the Bureau’s Credit Union Advisory Council”, March 19, 2019, [here](#).

⁶ “Consumer Financial Protection Bureau Charter of the Bureau’s Consumer Advisory Board”, March 19, 2019, [here](#).

committee has a distinct area of specialization, but the application review process is similar for all four. Applicants selected to serve on a committee hold a two-year term, and the membership is staggered such that half of the members will be replaced every year. Applicants have the opportunity to reapply when their term has been completed in order to serve another term. The ABC group collects personally identifiable information (PII) from applicants as part of the application and selection process.

In order to facilitate the goals of the ABC group and application process, the ABC uses an implementation of Salesforce Communities, the Advisory Committee Application Manager (“ACAM”), to collect application questionnaires and supporting documentation each year to complete the selection process necessary to fill vacancies in the four committees described above. Using the ACAM tool, the ABC can better organize the application and supporting documentation that was submitted, and package and distribute them to a small selection committee formed by assistant directors from the Bureau’s divisions for review and comments. The selection committee then ranks applicants and make recommendations on who moves onto the interview phase of the selection process. The tool also allows applicants to establish a username and password to register as users, which allows them to create, complete, submit, and view applications.

The collection of applicants’ PII is authorized by Sections 1011, 1012, 1014 of the Dodd-Frank Act. The collection is also covered by the System of Records Notices (SORN), CFPB.016, CFPB *Advisory Committees Records System*. The information collected within the ACAM tool requires approval under the Paperwork Reduction Act (PRA) as information collected through the Tool is a “collection of information” under 5 C.F.R. 1320.3(c) requiring the Office of Management and Budget (OMB) approval.⁷ OMB approved the collection of information for CFPB under control number 3170-0037.⁸

⁷ The Code of Federal Regulations defines a “collection of information” as: “[T]he obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on , ten or more persons, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit. ‘Collection of information’ includes any requirement or request for persons to obtain, maintain, retain, report, or publicly disclose information. As used in this Part, ‘collection of information’ refers to the act of collecting or disclosing information, to the information to be collected or disclosed, to a plan and/or an instrument calling for the collection or disclosure of information, or any of these, as appropriate.

⁸ For more information, please go to: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201911-3170-002

The ACAM Tool is being developed using the agile methodology. As such, system change requests and security assessment and authorization (SA&A) documentation address privacy relative to systems development, including, as warranted and appropriate: statement of need, functional requirements analysis, alternatives analysis, feasibility analysis, benefits/cost analysis, and, especially, initial risk assessment.

Privacy Risk Analysis

The ACAM collects PII from individuals who voluntary apply to serve as members of the CFPB advisory committees. Most of the PII collected through the application process is contact information and work/job-related experience information, which poses minimal privacy risk to the individual. Additional information related to citizenship and/or resident status, as well as demographic information, is collected to determine eligibility of the applicant and to ensure diversity of the applicants, respectively. These data elements may raise the privacy sensitivity of the collection. Accordingly, this PIA examines the additional risks.

Some privacy risks that the Bureau Privacy Program normally considers, including risks relating to the Bureau Privacy Principles, may be mitigated with the inclusion and application of appropriate security controls. The primary risks associated with the ACAM are risks related to:

- Data Quality and Integrity, and
- Data Minimization/Limit on Use.

Data Quality and Integrity: The Bureau collects PII to select qualified individuals to serve on the advisory committees. The Bureau relies on the quality and integrity of the information submitted through the applicant to ensure that appropriate selections are made. As such, applicants are provided with various mechanisms and opportunities to review and correct their information, as needed. Applicants can register and create a user account in order to access and correct their applications as they are completing it; however, once applications are submitted, applicants can only access read-only applications, including applications submitted in previous years. CFPB provides the opportunity for applicants to formally request their information through the Privacy Act request process.

Data Minimization/Limit on Use: The Bureau collects PII through applications that may contain open text boxes. This means that applicants can type in their input in the text boxes,

increasing the risk of extra or unnecessary personal information being provided by the applicants. The Bureau mitigates this risk by providing clear instructions on the application for the information being requested, and only asks for the minimal amount of PII necessary to adequately review the application and make a selection. In the event the applicant provides additional PII, the risk is further mitigated by the Bureau limiting the use of the information for only authorized purposes. This means the Bureau will only use the application to select qualified individuals to serve on its advisory committees. The applications will not be used for any other purpose.

Privacy Risk Management

- 1. Describe what information the CFPB collects, how the information is collected, and the sources from which the information is collected.**

The ACAM tool collects application questionnaires and supporting documentation including resumes, cover letters, and letters of recommendation directly from individuals who are applying for a position on one of the advisory committees administered by the ABC group. The tool will utilize Salesforce Communities to provide a website, applicant portal, and questionnaire form for application collection. The ACAM tool collects PII from individuals applying to serve on the committees through free text responses or attachments submitted to support the application. Applicants also include PII for one or more individuals who will be providing a recommendation on their behalf.

The application captures the following information from the applicant: first name, last name, middle initial, employer, email address, position/title, employer's address, work phone, mobile phone, place of birth, date of birth, gender, race/ethnicity, and citizenship and/or resident status. Additionally, the applicant provides the following information for all individuals who contribute a recommendation on their behalf: full name, title, and organization. The application forms include open text fields for longer response questions that do not directly request PII, but the responses to these questions may contain PII. Examples of these questions include requesting professional experience not listed on the applicant's resume, experience serving on a Federal advisory committee or board, and other affiliations or relevant experience. The form also provides open text fields for additional explanation for some of the yes/no

questions, such as whether the applicant is currently involved in any business before the CFPB or has ever been under investigation by the Internal Revenue Service (IRS).

Each year, the forty-five-day application window will open in January. During this window, applicants can register or log into the applicant portal to start, continue, or submit at most one application for each of the advisory committees. The application questionnaires for the committees differ slightly and contain unique questions necessary to determine appropriate experience, knowledge, and expertise from among the potential candidates, but all include the PII data elements listed above. These data are saved on each individual application separately. During the application window, an applicant can return to the portal to update these data but once the application window closes, or the applicant chooses to submit a complete application, these are saved and accessed in a view only format.

The tool allows for the upload and submission of supporting files in addition to the questionnaire responses. A completed application requires a resume, cover letter, and recommendation for review. The resume and cover letter must be uploaded through the tool before the application will be considered complete, but letters of recommendation may or may not be uploaded at the time of submission. Letters of recommendation that are emailed or mailed to the ABC are scanned and loaded to the appropriate application by the ABC. All files are submitted using secure hypertext transfer protocol (HTTPS) for file security.

Additional PII is captured from the applicant to create and register an ACAM user account. During account registration (to gain access to the Applicant Portal), applicants provide their first name, last name, and email address. Their username is sent to them in an email which includes a link to set a password in the system. Applicants have access to a profile which includes first name, middle initial, last name, email address, work phone, and mobile phone. This profile is available at all times via the portal, regardless of whether there is an application session open or not.

Information about employees and contractors working for the Bureau is also captured when it is imported into the system through Sailpoint, the Bureau's identity management system. The Sailpoint connection only syncs data details for CFPB employees and contractors who are actively working in the ACAM system. The following details about these users are synced in the system: first name, last name, display name, Bureau email address, Bureau division, Bureau office, office location, manager/supervisor name, contracting officer representative (COR) (if the user is a contractor), work phone, mobile phone, work address, job title, and work region.

2. Describe CFPB's objective for the information.

The ABC uses the collected application questionnaire data and supporting documents submitted to the ACAM tool to determine eligibility and select applicants to fill vacant positions on the CAB, ARC, CBAC, and CUAC. Members serve a two-year term and the terms are staggered such that vacancies are made available each year. Following the collection period for applications, the ABC team reviews all received applications for accuracy and completeness. The full details of all applications (including supporting documents) are shared with a small selection committee formed by assistant directors from the Bureau's divisions. Each selection committee member is assigned a subset of applications to review, and their analysis of each application is used to support the vetting and eventually selection of new committee members.

All details captured on the questionnaire forms are vital to this vetting process. The CAB, ARC, and CBAC/CUAC each have slightly different sets of questions included on the applicant questionnaire. Each of the advisory committees are subject to different membership criteria and restrictions as defined in their specific charters, and the unique questions on each questionnaire are necessary to determine appropriate experience, knowledge, and expertise from among the potential candidates. The application collects the place of birth and citizenship information to determine eligibility to serve on the advisory committees (i.e., must be U. S. citizen to be eligible to serve). Additionally, the stated goals included on the Privacy Act statement for the collection discuss a special interest in ensuring diversity and regionality considerations, so the gender, race/ethnicity, and employer region responses are vital for appropriately vetting candidates and obtaining these goals. The tool also captures resumes, cover letters, and letters of recommendation which are also utilized by the ABC and selection committee to evaluate the candidates.

Specific eligibility requirements for each of the committees are as follows:

- CAB: members of the CAB shall be “experts in consumer protection, financial services, community development, fair lending and civil rights, and consumer financial products or services and representatives of depository institutions that primarily serve underserved communities, and representatives of communities that have been significantly impacted by higher-priced mortgage loans, and seek representation of the interests of covered persons and consumers, without regard to party affiliation.”
- ARC: members of the ARC are economic experts and academics including economists with research and publishing experience, academics with recognized professional achievement and economic analysis of household finance, finance, financial education,

labor economics, industrial organization, etc. In particular members are expected to have technical expertise in econometrics, modeling of decision-making, survey and controlled trial methods, cost benefit analysis, and/or marketing.

- CBAC: members must be employees of bank or thrifts with total assets of \$10 billion or less that are not affiliates of depository institutions or community banks with total assets of more than \$10 billion.
- CUAC: members must be employees of credit unions with total assets of \$10 billion or less that are not affiliates of depository institutions or credit unions with total assets of more than \$10 billion.

In order to facilitate this process, ABC members utilize reporting functionality within the system to manage and organize the data. Selection committee members utilize the tool to view their assigned applications and record comments for use during the internal discussion and decision process. The data from the tool is not shared with any third-party partners or outside collaborators. Selection committee members review all provided data as well as attached supporting files in order to rank a subset of applications that they were assigned to review. These rankings facilitate a conversation between the selection committee members and ABC regarding which candidates are the best fit for the open positions on each committee, given the guidelines above. All data is used exclusively for the eligibility and vetting process by Bureau employees. Designated system administrators have visibility into the data for troubleshooting and system maintenance purposes only.

3. Describe how CFPB shares any of the information with third parties with whom the CFPB shares the information for compatible purposes, e.g. federal or state agencies, the general public, etc.

The information collected by the ACAM tool is not shared with third parties. This information is intended only for use by authorized users of the ACAM tool including but not limited to specified Bureau employees, contractors engaged in system maintenance, designated detailees, interns, or official volunteers at the discretion of the ABC and system owner. The applicants have view and edit access to their in progress applications only, and will retain view permissions to their completed applications from previous application periods but will not be able to view applications from any other applicant. The data is intended for Bureau use only and is not intended to be shared with third-party organizations, federal agencies, state agencies, or the general public.

Under the Routine Uses of SORN CFPB.016 *Advisory Committees Records System*, this information may be released to a third party under additional limited circumstances. Any disclosures made will be in accordance with the CFPB's rules on treatment of confidential information, 12 C.F.R. Part 1070.

4. **Describe what opportunities, if any, individuals to whom the information pertains have to (a) receive notice regarding the CFPB's use of the information; (b) consent to such use; (c) access the information that pertains to them; or (d) obtain redress.**

This PIA and the Privacy Act Statement posted on the login/registration page prior to logging into the applicant portal provide notice to the applicant on the intended purpose and use of the PII and whether or how applicants may opt out of providing personal data. Applying for and submitting an application is completely voluntary; by submitting the application, applicants are consenting to the Bureau's use of their information in accordance with the Privacy Act Statement. Individuals are also able to access and edit information that pertains to them through the applicant portal, but details included on submitted applications for previous collection periods may only be available in a view-only format on the applicant portal. Applicants may also send an email to the ABC email inbox to request any changes to their information or provide additional details or updates.⁹ The Bureau gives individuals the ability to request access and amendment to their personal information in accordance with the Privacy Act and the CFPB's Privacy Act regulations, at 12 C.F.R. 1070.50 et seq.

5. **Explain the standards and relevant controls that govern the CFPB's—or any third party contractor(s) acting on behalf of the CFPB—collection, use, disclosure, retention, or disposal of information.**

A full security review of the Salesforce Platform hosting the ACAM Diversity Assessment Tool has been conducted by the CFPB based on all applicable federal laws, directives, and standards. The CFPB has developed and followed a Security Implementation Plan (SIP) identifying the necessary steps to store PII within the Salesforce Platform. Additionally, the Authority to

⁹ Contact details can be found at the Advisory Group page on consumerfinance.gov. [Link](#)

Operate (ATO) for the CFPB Salesforce platform and ACAM Tool are underway and expected to be issued by the end of November 2020.

The CFPB issues authorized personnel non-transferrable access to the Salesforce platform following the CFPB's User Access Request process. Some users may also include CFPB contractors. Employees and contractors must also complete system training, including confidentiality and privacy briefings. Users will be granted roles based on their division and need to access the data in the system. The PII in the ACAM tool will not be stripped of direct identifiers and will be fully accessible to approved employees, contractors, and any other personnel with access to specific records. The CFPB uses the following technical and administrative controls to secure the data and create accountability for the CFPB's appropriate collection, use, disclosure, and retention of the information:

- Implementation of applicable National Institute of Standards and Technology (NIST) 800-53 control(s)
- Audit Logs and Reviews
- CFPB Personnel Privacy Training
- CFPB Privacy Breach Response and Recovery Plan
- Compliance with CFPB cybersecurity policy and procedures
- Data Quality and Integrity Checks
- Policy and Standard Operating Procedures
- Role-based Access Controls: Initial access to data are established as private within the application, meaning only the data owner can see the data, but with the Application Owner's approval, additional data sharing rules may be built into the system that may allow multiple users to see data on a divisional or organizational wide basis. All users of the system will receive role-based training.
 - The following internal users will have access to information collected and maintained by the ACAM tool:
 - Applicants: External applicant users who have access to their own information.
 - ABC and Selection Committee Users: Internal users (potentially including detailees, interns, and official volunteers) who have access to application details, submitted files, application review records, and comments pertaining to the applications.

- Developers: Internal users (CFPB employees or contractors) who have administrator access in the sandbox (i.e., testing) environments they work in. Developers have access to User Acceptance Testing (UAT) sandboxes that contain a full copy of production data from the ACAM tool to allow for full testing of the applications. Developers do not have access to the ACAM production environment and cannot make changes to the system without support of the release management team. Requests must be submitted for elevated access.
 - Business Analysts: Internal users (CFPB employees or contractors) who work with development teams to configure the ACAM tool and have Administrator level access in both the team sandboxes and the UAT sandboxes to assist with development and testing of the applications. Business Analysts do not have access to the ACAM tool in the production environments. Requests must be submitted for elevated access.
 - Release Management Team: Internal users (CFPB employees or contractor) who have Administrator level access in all Salesforce environments including the ACAM tool production environment to conduct deployments and make system changes as necessary.
 - System Administrators: Internal user (CFPB employees) who are Salesforce platform system administrators have full access to the system, data, and all applications within to perform critical functions such as troubleshooting issues and user access setup. All system administrator access is considered elevated and requires an approved and active user access request.
- Records Retention Requirements: The Bureau maintains the applicant's records in accordance with GRS 6.2 Federal Advisory Committee Records, item 060 (DAA-GRS-2015-0001-0006). The records are destroyed when 3 years old, 3 years after submission of report, or 3 years after superseded or obsolete, as appropriate. Longer retention is authorized as required for business use.
 - Personnel Security, including background checks of federal employees, contractors, detailees, interns, and official volunteers.

6. Discuss the role of third party(ies) that collaborate or partner with the CFPB, if any. Identify any controls used to protect against inappropriate collection, use, disclosure, or retention of information. (This does not include third parties acting on behalf of the CFPB, e.g., government contractors discussed in Question 5.)

The application information captured and maintained in the ACAM system will not be shared externally. Information collected is only intended for use by authorized system users of the ACAM system to include employees and contractors of the Bureau, as well as approved detailees, approved interns, and approved official volunteers supporting the Bureau. Aggregated statistics of demographic details may be shared with Congress as a result of specific congressional inquiry requests.

Document control

Approval

Donna Roy

Chief Information Officer (Acting)

Tannaz Haddadi

Chief Privacy Officer

Kimberley Medrano

Program Manager, Section for Advisory Board and Councils

Change control

Version	Summary of material changes	Pages affected	Date of change
1	New Publication	All	