Enterprise Customer Relationship Management (eCRM) Tool PIA v.3

Does the CFPB use the information to benefit or make a determination about an individual?	No
What is the purpose?	To provide a more efficient and effective process for responding to inquiries, documenting interactions with external stakeholders, and approving Bureau documents for public release
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

Overview

The Consumer Financial Protection Bureau ("Bureau" or "CFPB") interacts with external stakeholders in a myriad of ways: the public, through various consumer-facing portals or direct interactions; the media, through speaking inquiries or requests for comment; other government officials, by responding to information requests or coordinating complementary regulatory efforts; and Congress, by responding to congressional inquiries and questions for the record. Between the significant interactions that take place with these external stakeholders, to the more formal responses that certain inquiry types may require, coordinating a response to each of these inquiries is often a complicated process that involves the efforts of multiple divisions within the Bureau.

As noted in Version 1 of this PIA, the Enterprise Customer Relationship Management (eCRM) tool,[1] is a consolidated database for some inquiries that the Bureau receives, aims to make the inquiry management process more efficient, and provides those involved in a response more ways to collaborate and have insight into the process. The tool represents a task tracker to coordinate the status of the response and allow for automation of the process as well as acting as a repository for the finalized responses to these inquiries for reporting purposes. In alignment with these goals, it is necessary to collect limited personally identifiable information (PII) related to external congressional, financial institution, and association stakeholders, such as name, phone number, email address, and mailing address[2] to allow Bureau staff to provide responses to the requestors.

Version 2 of this PIA includes assessment of the privacy risks associated with the updated functionality to include an Interaction Management module,[3] a Speaker Request module, and an Interaction Outlook Reporting feature for the eCRM tool. Through the Interaction Management module, eCRM users will create records of various interactions between Bureau staff and

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[1] The eCRM tool is built on the existing Bureau Salesforce Platform, which was issued an Authority to Operate ("ATO") at the Moderate level, signed November 16, 2016. The Cloud 2 General Support System PIA covers PII contained in Salesforce.

[2] A full list of the PII elements that may be captured within the eCRM system are included in Question 1 of the Privacy Risk Management section of this PIA.

[3] In previous versions of this PIA, this was referred to as "Interaction Management".

external stakeholders. The Speaker Request module is a tracking tool designed to replace an existing process for receiving and preparing requests from external parties for Bureau representation at external panels, functions, and industry events. The Interaction Outlook Report is a combined report of Interactions, Inquiries, and Speaker Requests built to provide a select group of Bureau executive staff a preview of upcoming events, deadlines, etc. for planning purposes, known as the Executive Report. Responses in this PIA will apply to all functionalities of the eCRM tool, unless specifically noted.

Version 3 updates this PIA to reflect changes to the system in the Engagement Management module, which includes both External Engagements and Speaker Requests. External Engagements were previously referred to as "Interactions" in previous versions of this PIA. The Speaker Request form now incorporates the cost of attendance and financial consideration sections, and the system routes the request to the Bureau's Ethics Program for their recommendation. This PIA will cover the eCRM tool as a whole, but risks and analysis may refer to specific modules of the eCRM tool.

The authority for the eCRM tool is Public Law No. 111-203, Title X, Sections 1011, 1012, 1013, codified at 12 U.S.C. 5491, 5492, 5493. PII collected in the eCRM tool is covered by the System of Records Notices (SORN), CFPB.011, *Correspondence Tracking Database* and SORN CFPB.013, *External Contact Database*.[4] The information collected within the Inquiry Management and Engagement Management modules do not require approval under the Paperwork Reduction Act (PRA) as information collected through the Inquiry Management module of the eCRM tool is not being collected through a "collection of information" under 5 C.F.R. 1320.3(c).[5] For information collected through the Engagement Management module, if

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[4] Information collected in the Speaker Request form is also covered under the SORN CFPB.015, *Ethics Program Records*, 83 FR 23435. However, the information covered under this SORN is specifically limited to Federal employees and is not the subject of this PIA.

[5] 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

information is collected through a form, survey, or other method of intaking information, the collection will go through the CFPB's Data Intake Group. The Data Intake Group assesses the collection, determines whether it is subject to the Paperwork Reduction Act, and the Privacy Program is consulted as to whether notice is needed, and if so, whether that falls under a general notice or under a Privacy Act Notice. Information collected on the Speaker Request form within the Engagement Management module is subject to the Paperwork Reduction Act and is currently in the process of PRA approval.

Privacy Risk Analysis

The Inquiry Management module was assessed for privacy risks in Version 1 of this PIA, approved January 4, 2019. This updated PIA accounts for three modules of the eCRM tool; Inquiry Management, Engagement Management, and Engagement Management Outlook Reporting. [6]

The Inquiry Management module is intended to automate the collection of incoming inquiries through postal mail, email, or in person, and provide efficiency while tracking the process of coordinating and producing the Bureau's response. PII collected through the Inquiry Management module is related to external congressional, financial institution, and association stakeholders. The Engagement Management module is limited to collection of the same PII, but PII collected would also include that of external industry contacts, vendor contacts, and financial institution representatives. [7] Additionally, context surrounding the interactions or individuals that the CFPB interacts with may increase the sensitivity of the PII. The information collected through the Speaker Request form is limited to collection of the same PII as the Inquiry Management and Engagement Management modules, and the PII collected would be from the same types of external individuals as the Engagement Management module. As noted

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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."

[6] An additional "Bureau-Wide Content Clearance" module of the eCRM tool has also been introduced. However, this module does not collect, maintain, or disseminate information in identifiable form from or about members of the public, and therefore, PIA analysis of this module is not required under OMB M-03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government of 2002.*

[7] The eCRM tool will not hold information regarding inquiries from consumer or interactions with consumers related to their consumer complaint; information related to those complaints are covered in the Consumer Response System PIA.

in the Overview, the Speaker Request form now incorporates the cost of attendance and financial consideration sections, and the system routes the request to the Bureau's Ethics Program for their recommendation. The Engagement Management Outlook Reporting feature does not capture additional PII, but combines details captured in the other modules for a specific executive staff audience. Accordingly, this PIA examines additional risks, in addition to the risks presented in Versions 1 and 2 of the eCRM PIA.

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 eCRM tool Inquiry Management and Engagement Management modules are risks related to:

- Limits on Uses and Sharing of Information
- Awareness and Training
- Data Minimization
- Data Quality and Integrity
- Individual Participation
- Accountability and Auditing
- Openness and Transparency

These risks and their mitigations are described below:

Limits on Uses and Sharing of Information

The development and use of the eCRM tool creates privacy risk due to the consolidation of contact and tracking information into one repository that may increase the risk of improper access to PII or improper use or disclosure of information. PII contained in the eCRM tool may be considered non-public, including private contact information. Least access privileges and role-based need-to-know principles will be implemented both through technical and administrative controls in order to control the sharing of information to those without a need to know. Additionally, information that will be visible to all approved users of the eCRM tool will be the name, entity, and title of individuals; contact information including phone number, address, or email address will be available only to individuals with a need to know.

Additionally, some of the inquiries the CFPB receives through the Inquiry Management module could include sensitive information or PII about third parties (such as when members of Congress request assistance for one of their constituents). Appropriate access controls and internal sharing of information with individuals that have a need to know are important to

mitigate this risk. The eCRM tool's inclusion of audit logs and comprehensive access controls, including role-based access for need to know, will enable the CFPB to mitigate the risk of inappropriate use of stored information in the eCRM tool.

Awareness and Training

The CFPB plans to mitigate risks presented by the misuse of the eCRM tool through training of users. Training will include guidance on appropriate use of the tool and PII contained in the system, as well as reinforce the need to quickly report unauthorized disclosures of information through the Bureau's Service Desk for routing to the privacy and cybersecurity teams. Additionally, if a disclosure occurs, the Senior Agency Official for Privacy (SAOP) makes a determination about a suspected or confirmed disclosure of sensitive information to Bureau personnel, contractors, or others with access to the Bureau's information and information systems as defined in the Bureau's Policy on Suspected Breach Reporting.

Data Minimization

Risks associated with data minimization primarily apply to the Inquiry Management and Engagement Management modules. Because the Bureau cannot control the content of submitted inquiries and information associated with Speaker Requests, the submitted inquiries and requests could contain information that would be considered unnecessary PII. For the Inquiry Management module, the system is designed to allow for a copy of the original inquiry and draft or final responses to be saved in the system. The content contained within these documents may refer to or include information pertaining to third party external individuals who are not within the Bureau or initiating the inquiry. If an inquiry or speaker request inadvertently contains sensitive information, including unnecessary PII, the Bureau will take steps to either exclude that PII from the system or to limit access to the sensitive information to only those individuals with a bona fide need to know through role-based access controls.

Data Quality and Integrity

Because the Inquiry Management module is being used for the purpose of submitting inquiries to the CFPB in order to get a response, it is assumed that the PII being collected is accurate and that there are not data quality or integrity issues. Additionally, with regard to the Engagement Management module, because this information is being collected directly from the individual in most cases, it is assumed that they are providing accurate information. Similarly, the Speaker Request form within the Engagement Management module will be collecting PII provided by individuals requesting speaker attendance and it is assumed the PII provided is accurate.

However, when that information is entered into the module, there is the possibility of human error in entering the correct information.

Individual Participation

Information contained in the eCRM tool is collected in accordance with the Privacy Act of 1974, and therefore, individuals will have the opportunity to access their PII and allow them to correct or amend it if it is inaccurate through the processes provided in the governing SORNs.

Accountability and Auditing

The eCRM tool is being developed in accordance with input of representatives from the Privacy Program and the Legal Division to ensure compliance with all relevant governing authorities. Additionally, both internal and independent auditors hold the Bureau accountable for complying with CFPB policies and procedures related to the processing of PII. The CFPB is committed to taking swift and immediate action if we uncover any violations of law or our policies and procedures.

Openness and Transparency

Contact information collected in the eCRM tool is collected directly from the individual. With regard to the Inquiry Management module and Speaker Request form within the Engagement Management module, individuals are submitting information for the purpose of receiving a response from the CFPB; the collection of information is inherent to the submission. Prior to the collection of information included within the Engagement Management module, if appropriate, individuals will be provided a Privacy Act Notice. Additionally, the information collection associated with the Speaker Request form within the Engagement Management module is subject to the Paperwork Reduction Act; accordingly, this collection is subject to Office of Management Budget review and must include appropriate notice on the information collection form.

The technical, physical, and administrative controls implemented to limit the risk of harm to individuals are appropriate.

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 eCRM tool has two different modules that collect PII from members of the public: Inquiry Management and Engagement Management. For both modules, the system will allow for the capture of the limited following information: First Name, Last Name, Associated Entity, Phone Number, Mobile Phone Number, Preferred Phone Number, Title, Email Address, Secondary Email Address, Mailing Address, and Military Information (including branch, rank, location, service status) for external stakeholder contacts described above and Bureau employee contact records. However, most of this data is optional, with only a Last Name and either a Phone Number or Email being required fields. There is also a "notes" field in the eCRM tool, in which users can include notes or comments relating to the inquiry or record. In addition to providing privacy-specific training for the tool, the Bureau will provide training to all users of the tool to emphasize that any "notes" field should not include PII.

Bureau employees and contractors who have been granted system access through the approval of the application product owner will have the following details captured in the system: First Name, Last Name, Bureau Phone Number, and Bureau Email Address.

Speaker Request data is collected through a Speaker Request form, which is subject to the Paperwork Reduction Act. All other data stored in this system is not collected through surveys or forms (physical or digital).

Inquiry Management

The Inquiry Management module of the eCRM tool will hold limited relevant information related to external congressional, financial institution, and association stakeholders who have filed an inquiry with the Bureau. The system will also include a copy of the inquiry and the final response. The inquiry and response may contain sensitive information to include PII about third parties. Additionally, some information about employees and contractors working for the Bureau will be captured when they are given assigned roles relating to an inquiry.

External stakeholders will include members of Congress who have initiated inquiries with the Bureau, congressional staffers who have initiated an inquiry on behalf of the member of Congress that they serve, as well as individuals initiating a request on behalf of the financial institution or association they represent. Information will be collected through mail and email, although there is the possibility of collecting information by phone or through in-person contact. Types of inquiries include: briefing requests, Congressional Budget Office requests, congressional correspondence, Office of Legislative Affairs information requests, intergovernmental inquiries, letters, questions for the record, reports, and technical assistance requests.[8]

Individual contact records will be entered manually by CFPB employees who have been granted system access using the contact information provided by the individual making an inquiry to the Bureau, or through linking to information that has already been entered into the system through use of the eCRM tool. "Phone book" records containing limited details taken from the new contact record will be created by the system and will be visible to all authorized and approved users of the eCRM tool following the creation of a new contact record. The phone book entries will be limited to the following details: Name, Entity, and Title. System access to the additional contact details will be provided only due to a defined need to know.

Engagement Management

As noted in the Overview, the Engagement Management module now accounts for external engagements (formerly known as "interactions") and speaker requests. The Engagement Management module collects basic contact information for external individuals that are or will be involved with specific "significant interactions". The information collected is exclusively contact information necessary to identify the individual for CFPB records with the goal of creating a history of the types of external interactions the Bureau is having and with whom these interactions are occurring. eCRM Users will create "eEngagement" records, which represent a phone call, email, meeting, webinar, etc. that the eCRM user engaged in with a Congressional stakeholder, Financial Institution stakeholder or an intermediary and will then associate the "Contact" record (representing these external individuals) to the

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[8] See Appendix A.

newly created engagement record. These engagements and contacts will be visible only by eCRM users who are associated with the same division as the record creator, pursuant to current sharing and access guidelines. Each division has defined their own set of events that they consider "significant interactions".[9]

The use of "Contact" records in the system will capture data about external industry contacts, vendor contacts, and representatives of financial institutions who have interacted with Bureau employees will remain the same as in the Inquiry Management module. Information will be collected directly from the individual via verbal or emailed requests for their contact information, through the individual's contact information provided in their email signature, or other direct conversation or request for contact information. Phone book entries will also be created by the system for these contact records as well as described above.

While typically name, company, job title, and business contact information are considered to be non-sensitive, the context can also determine the sensitivity of the PII collected. In the case of the Engagement Management module, the CFPB may have collected contact information in the context of a supervisory examination or under another sensitive context. Additionally, a contact may have a "flag" associated with their contact record, in the case that eCRM users should be aware of a pending examination or other sensitive circumstances. Thus, the PII may be considered to be sensitive, and it may be linked with "Confidential Supervisory Information".

Speaker Request Form

The Speaker Request form within the Engagement Management module collects basic information for external individuals who are requesting CFPB presence at an external function, panel discussion, or other event. The module will leverage existing contacts that have been added to the system through the Engagement module, or approved and authorized users of the system will add new contacts if there is no existing phone book entry for the requestor. Contact information will be gathered directly from the individual making

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[9] See Appendix B.

the request. System access to speaker request records will be maintained through similar role-based need to know as described in the other modules.

Engagement Outlook Reporting

The Executive Report produced by the Engagement Outlook Reporting feature does not capture additional PII beyond what is stored in the previous three modules. However, this feature consolidates the details of Engagements and Inquiries into a "look ahead" report for CFPB executive staff, providing them the details of upcoming interactions with external stakeholders. Details such as the external point of contact information, status of the interaction, topics discussed, etc. will be consolidated in the Executive Report. The report will provide details on upcoming events across all divisions. The target audience is senior level executives and their staff, including Policy Associate Directors and Associate Directors.

2.   Describe CFPB's objective for the information.

Inquiry Management

The Inquiry Management module of the eCRM tool was designed to support and track the intake, processing, and response to formal inquiries regarding Bureau activities. The goal of this function is to provide a structured customer relationship process that will allow for efficient management of formal inquiries from the point they are received by the CFPB to when the response or responses have been approved and sent back to the requestor. The information being collected as part of this phase will be used to provide a secure role-based repository of external stakeholder information, manage the inquiries that stakeholders have with the Bureau, and provide an Inquiry Management application that will allow the Bureau to efficiently coordinate and approve correspondence in response to these inquiries.

In alignment with the stated goals of the Inquiry Management module of the eCRM tool, it is necessary to collect limited PII related to external congressional, financial institution, and association stakeholders such as name, phone number, email address, and mailing address. This PII will be used to respond to inquiries as necessary and where appropriate, in alignment with the stated goals of the eCRM tool. Additionally, by associating the contact records created for these stakeholders to inquiries, the Bureau will be able to view a clear history of the inquiries that stakeholders are sending to the Bureau and drive improvements to how the Bureau interacts with these individuals in the future. As noted earlier in this PIA, there is the option of

collecting additional elements of PII in the eCRM tool. Although only basic contact information (last name and either a phone number or email address) is required for collection, additional limited contact information provides additional context for the inquiry and providing an appropriate response.

Engagement Management

The information captured for the eCRM Engagement Management module will be used exclusively to identify industry individuals with whom the Bureau is interacting on an official and significant capacity. The purpose of this identification is for tracking, reporting, and future outreach. The goal of the application is to provide each Division's Front Office with a clear understanding of what significant engagements are taking place within their divisions and the external individuals and entities that are involved with these engagements. This will provide the Bureau with a more complete understanding of who and how it is interacting with vendors, industry contacts, and representatives of financial institutions.

The information captured within the Engagement Management module for the Speaker Request form will be used exclusively to identify industry individuals who have requested CFPB presence at a panel or event. The purpose of this identification is for tracking, reporting, and future outreach. This information is primarily used to provide a clear understanding of who is requesting CFPB presence and how to contact them for additional details, if necessary.

Engagement Management Outlook Reporting

The Executive Report consolidates information regarding upcoming engagements across all divisions for Bureau executive planning purposes. Presenting the details of upcoming Engagements and Inquiries provides the executive audience a clear understanding of current and upcoming Bureau activities with external stakeholders in order to review, plan, and monitor these activities.

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.

Under the Routine Uses of the SORNs CFPB.011, *Correspondence Tracking Database* CFPB.013, *External Contact Database,* there are additional limited circumstances in which any personally identifiable information in the eCRM tool could be released to a third party.[10] Additional details about sharing information with third parties is explained below by each functionality of the eCRM tool.

Inquiry Management
PII collected from external stakeholders and Bureau employees is intended only for use by authorized users of the eCRM tool to include employees or contractors of the Bureau.[11] Information stored in the system about individuals will not be shared outside the Bureau, except in the case where third party PII is included in either the full text of an inquiry or the response to the inquiry. In that case, the information is shared with the original submitter.

Engagement Management
Information collected for the Engagement Management module is not intended to be shared with any other third-party organizations, federal agencies, or state agencies; its use is entirely intended for internal Bureau review.

Engagement Management Outlook Reporting
Information organized in the Executive Report feature is not intended to be shared with third-party organizations, federal agencies, or state agencies; its use is entirely intended for an internal, executive level audience.

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[10] See CFPB.011, *Correspondence Tracking Database*, CFPB.013, *External Contact Database*, CFPB.014, *Direct Registration and User Management System* for the full lists of Routine Uses.

[11] There is also the possibility that other Bureau staff will have access to this information, including detailees, interns, and official volunteers.

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.**

PII collected for the purpose of Inquiry Management that is contained in the eCRM tool is covered under the SORN, CFPB.011, *Correspondence Tracking Database*. PII collected for the purpose of Interaction Management that is contained in the eCRM tool is covered under the SORN, CFPB.013, *External Contact Database*. 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.

Inquiry Management

Regarding the Inquiry Management module, individuals will not be given notice prior to the collection of their personal information for use in the module. The tool is built to allow CFPB employees to respond to inquiries that have been initiated by congressional members, congressional staff on behalf of their congressional members, individuals acting on behalf of financial institutions, and individuals acting on behalf of associations. The CFPB is not soliciting personal information from these individuals; rather they are providing this information voluntarily with the expectation of receiving a response from the CFPB. Due to this, there is an implicit expectation that the CFPB would capture that information in order to track, draft, and respond to the inquiries. There is also considered to be implicit consent that the CFPB would collect that information in order to track, draft, and respond to the inquiries.

Contact records will be entered manually by CFPB employees or contractors who have been granted system access using the contact information provided by the individual making an inquiry to the Bureau, or through information that has already been entered into the system through a previous inquiry.

Contact records will not be verified for completeness at a system level but do require either a phone number or email address before the record can be saved. It is assumed that the individuals initiating inquiries in their official capacity as a member of Congress, representative of a financial institution, etc., will provide sufficient and correct contact details to ensure the response can be provided. The contact information contained in the system will be provided directly by the individuals initiating the inquiry.

Engagement Management

Individuals will not be provided notice prior to the collection of their personal information for use in the Engagement Management module. The tool is built to allow CFPB employees to track engagements with external contacts in their official capacities. The CFPB is not soliciting personal information from these individuals; rather they are interacting with the Bureau and providing their information voluntarily.

Contact records will not be verified for completeness at a system level, but do require either a phone number or email address before the record can be saved. The contact information contained in the system will be provided directly by the individuals interacting with the Bureau (for example, through a conference registration or an email to a Bureau employee).

As the Speaker Request form within the Engagement Management module is subject to the Paperwork Reduction Act, individuals will be provided appropriate notice prior to the collection of their personal information for use in this module. However, the CFPB is not soliciting information from the individuals producing speaker requests. Rather, the individual is providing their information voluntarily in order to request CFPB presence at an event with the expectation that CFPB may need to communicate with them for further details. Due to this, there is an implicit expectation that the CFPB would capture that information in order to track, prepare for, and respond to requests for speakers.

Engagement Management Outlook Reporting

The Executive Report does not collect additional PII, but the individuals included in the report would have been provided with the same notice, and opportunities for consent and access as discussed in the prior sections for Inquiry Management and Engagement Management.

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 eCRM tool has been conducted by the CFPB following the CFPB's Risk Management Plan (RMP) process for a Federal Information Security Modernization Act (FISMA) Moderate Major Application (MA). The Salesforce

Government Cloud Platform is reviewed under the HHS FedRAMP authorization package. The CFPB has developed and followed a Security Implementation Plan (SIP) identifying the necessary steps to store sensitive information within the Salesforce Platform. Furthermore, the eCRM tool has been issued an Authority to Operate at the moderate level, signed January 4, 2019. Additionally, the Salesforce platform has been issued an Authority to Operate (ATO) at the Moderate level, signed November 16, 2016.

The CFPB issues authorized personnel non-transferrable access to the Salesforce platform following the CFPB's User Access Request process. Employees 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 eCRM system will not be stripped of direct identifiers and will be fully accessible to employees, contractors, and any other personnel with access to specific records. As noted earlier in this PIA, while information will not be masked, if an inquiry contains sensitive information, including PII, the Bureau will take steps to either exclude the PII from the system, or to limit access to the sensitive information to only those individuals with a bona fide need to know.

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:

- 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
- Extract logging and reviews
- 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. Phone book entries with limited contact details will be visible to all authorized and approved users of the system regardless of role.[12]

- Records Schedule Submitted to/Approved by National Archives and Records Administration (NARA): The Bureau maintains computer and paper records indefinitely until the NARA approves the Bureau's records disposition schedule. Records that fall under a general records schedule will be disposed of according to the applicable schedule

- Personnel Security, including background checks of contractors and federal employees

6. Discuss the role of third parties that collaborate or partner with the CFPB, if any. Identify any controls used to protect against inappropriate collection, use, disclosure, or retention of information.

The Contact details captured in the system will not be shared externally. Information collected for external stakeholders and Bureau employees is intended only for use by authorized users of the eCRM tool to include employees or contractors of the Bureau.[13] There are no plans to make the eCRM tool and the information contained within accessible to third parties. Information stored in the system about individuals will not be shared outside the Bureau, except in cases noted below within the Inquiry Management module.

Inquiry Management

Information stored in the system about individuals will not be shared outside the Bureau, except in the case where third-party PII is included in either the full text of the inquiry or the response to the inquiry. In that case, the information is shared with the original submitter.

The Contact information within the system will not be shared with other employees within the Bureau, while full text of inquiries and their responses will be shared with employees

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[12] The phone book entries will be limited to the following details: Name, Entity, and Title.

[13] There is also the possibility that other Bureau staff will have access to this information, including detailees, interns, and official volunteers.

who have a need to know because they are working on the response. As detailed in Section 5, sharing of the information contained in the eCRM tool will be protected under the applicable controls.
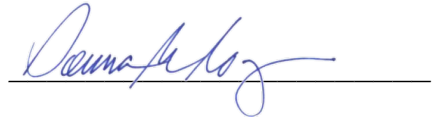
Engagement Management

There are no anticipated third-party collaborators or partners who will have access to PII contained within the Engagement Management module.

Engagement Management Outlook Reporting

There are no anticipated third-party collaborators or partners who will have access to PII consolidated in the Executive Report.

Document control

Approval

Donna Roy

Chief Information Officer and System Owner

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Tannaz Haddadi

Acting Chief Privacy Officer

Change control

Version	Summary of material changes	Pages affected	Date of change
1	New	All	01/04/19
2	Added details related to Speaker Request module and clarifications to sharing and record access	All	07/18/19
3	Added details related to the changes of the Interaction Management module to the Engagement Management module, which incorporates the Speaker Request form and external engagements (previously interactions). Reflects new system owner.	All	03/30/20

Appendix A

Types of Inquiries in the eCRM Tool

Inquiry Type	Definition
Briefing Requests	Inquiry received by CFPB employee to attend a briefing request
Congressional Budget Office Request	Any Inquiry received from Congressional Budget Office
Congressional Correspondence	General Inquiry received from Congress
OLA – Information Request	Inquiry for the Bureau specifically related to Legal Authority/Policy
Intergovernmental	Inquiry received from another Federal Agency
Letter	Inquiry received from Constituent or any other external Stakeholder
Question(s) for the Record	Inquiry received from Congress following a Congressional Hearing
Report	Reports and white papers received from Stakeholders; Submit an Informational memo to Executive Secretariat
Technical Assistance Request	Inquiry received for Technical Assistance for Salesforce Apps or CFPB website

Appendix B

Types of Engagements in the eCRM Tool

Interaction Type	Description
Call	For official phone conversation with a contact at an Entity/Intermediary
Email	For official conversation via Outlook with a contact at an Entity/Intermediary
Meeting	For official gathering while representing the Bureau
Webinar	For webinars that the Bureau leads or conducts
Ad-Hoc Request Check In	For meetings or calls with Financial Institutions or Vendors
Site Visit	For official Bureau business at an Entity Location
Industry Meeting	For attendance to a Forum, Conference, etc., specific to the Financial Industry (Includes structured phone calls)
Speaker Request	For requesting a Bureau employee to speak at a forum, conference, or any other external event