

# Entellitrak Ombudsman Tool

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

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No.

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**What is the purpose?**

Manage inquiries to and outreach with the CFPB Ombudsman's Office.

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**Are there controls to enforce accountability?**

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

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**What opportunities do I have for participation?**

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

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Consumer Financial  
Protection Bureau

# Overview

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Public Law No. 111- 203, Title X (Dodd-Frank), established the Consumer Financial Protection Bureau (CFPB or Bureau). The Bureau administers, enforces, and implements federal consumer financial protection laws.

The CFPB Ombudsman's Office (Ombudsman's Office or Office), established in Dodd-Frank, is an independent, impartial, and confidential resource that assists consumers, financial entities, consumer or trade groups, and others (referred to herein generally as inquirers) to informally resolve process issues arising from Bureau activities. Dodd-Frank established the Ombudsman's Office to "act as a liaison between the Bureau and any affected person with respect to any problem that such party may have in dealing with the Bureau, resulting from regulatory activities of the Bureau...." § 1013(a)(5).

To manage the inquiries submitted to the CFPB Ombudsman's Office as well as the Office's independent outreach, the Office uses the Entellitrak application (also referred to as 'system'). Entellitrak is an enterprise level commercial off-the-shelf (COTS) product hosted by a third party service provider that provides the Ombudsman's Office with an integrated case management system with functionality to collect, track, manage and, process, as well as analyze information on individual inquiries to the Office. Entellitrak also provides the Ombudsman's Office with the ability to manage its independent outreach activity in an electronic format. The scope of this Privacy Impact Assessment (PIA) addresses the privacy risks associated with the Ombudsman Office's implementation and use of Entellitrak.

The Ombudsman's Office provides information on its public webpage on how to contact the Office at [www.consumerfinance.gov/ombudsman](http://www.consumerfinance.gov/ombudsman), and receives inquiries by email, telephone (including TTY/TDD), facsimile, or mail. The Ombudsman's Office also provides notice on its webpage that it has safeguards in place to preserve confidentiality. When the Office receives an inquiry, it creates an inquiry record in Entellitrak that includes the inquirer's first and last name, if an individual chooses to provide it, along with a summary of the inquiry. If the inquirer wishes to remain anonymous, the Office creates a record in Entellitrak without the name of the inquirer, reflecting only a summary of the inquiry. Otherwise, the system maintains a limited amount of personally identifiable information (PII) to only include first name and last name. The Ombudsman's Office does not include contact information associated with the inquiry in the Entellitrak record. Rather the Ombudsman's Office maintains contact information separately in the original format submitted by the inquirer (i.e., in the general Ombudsman Office email box, postal mail, or notes taken from the voicemail received). The purpose of collecting the PII is to enable the CFPB Ombudsman to assist consumers, financial entities, consumer or trade groups, and others in efficiently and securely resolving issues with the Bureau. The Ombudsman's Office may seek to resolve an individual or systemic issue by providing

feedback and making recommendations to the Bureau. To assist, the Office also can: facilitate discussions, brainstorm, and evaluate options and resources, share independent analyses, offer an impartial perspective, and engage in shuttle diplomacy, among other options. The information is also used for administrative purposes.

Entellitrak is a cloud-based solution accessed via a secure web interface used only by Ombudsman's Office staff. Entellitrak 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.

Individuals receive notice of the application and the uses of information collected and maintained within the application through the publication of this PIA and the CFPB.010—Ombudsman System, system of records notice (SORN). The Paperwork Reduction Act (PRA) will not apply to Entellitrak. The Ombudsman's Office collects and uses data to create and track inquiries to the office and outreach activities. Entellitrak does not ask "identical" questions of ten or more persons as defined in 5 CFR 1320.3(c).

## Privacy Risk Analysis

The primary privacy risks associated with this application are related to:

- Data minimization
- Confidentiality
- Security

### ***Data Minimization***

When submitting an inquiry to the Ombudsman's Office, an inquirer may put data at risk by providing additional or unnecessary PII. The Office mitigates this risk by limiting the scope of information collected in Entellitrak to the amount of data necessary to act upon inquiries. PII, limited to first name and last name, is used solely by the Ombudsman's Office to assist with resolving an inquiry. Any additional PII submitted by the inquirer is not included in the Entellitrak record. The information is collected directly from an inquirer, and the submission and collection of PII is voluntary. The collection of this data is the minimum necessary amount of information for the Ombudsman's Office to assist an inquirer with resolving the inquiry.

### ***Confidentiality***

Given the sensitive nature of inquiries received by the Ombudsman's Office, there is a risk of reputational harm to the inquirer, the Bureau, and the CFPB Ombudsman's Office in the event of a data breach or a breach of confidentiality. The Bureau minimizes risk by enforcing access controls to minimize the access to data to only authorized Ombudsman's Office staff. Ombudsman's Office staff are also trained on appropriate uses of the data within the application prior to receiving access to the application. Entellitrak does not connect with any other application or system.

### ***Security***

Given the content and sensitivity of information held within this cloud-based solution there is a risk that unauthorized individuals can gain access to the information via web interface. The Bureau mitigates this risk by only granting Entellitrak system access to authorized Ombudsman's Office staff who, based on their need to know, are restricted to the minimal amount of data required or appropriate to carry out their assigned job responsibilities. Access to the system is granted solely by the System Owner, the Ombudsman's Office, and approved users are required to log into the application with a secure username and password. This access is restricted or terminated at the request of the Ombudsman's Office, as necessary, should the staff member no longer have a need to know the information, change job functions, be terminated, or resign. Information within the application is subject to the appropriate technical, physical, and administrative controls implemented to address these risks, such as encryption for data maintained within the system. For example, National Institutes of Standards and Technology (NIST) controls families, including Identification and Authentication (IA) and Risk Assessment (RA), are implemented to restrict access to the information to authorized Ombudsman's Office Staff.

The technical, physical, and administrative controls implemented to limit uses of PII, secure the application, and minimize data to the amount necessary are appropriate for the purpose of the application.

## **Privacy Risk Management**

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

Authorized Ombudsman's Office staff collect information directly from inquirers who contact the Office, and include consumers, financial entities, consumer or trade groups, or anyone else who has a process issue from their interactions with the Bureau. These inquirers email, telephone (including TTY/TDD), mail, or fax an inquiry to the Ombudsman's Office. An Ombudsman's Office staff member securely accesses Entellitrak and creates an inquiry record, and the inquiry is auto-assigned

a record ID that is used to refer to the specific inquiry. This ID is not used to compare or match records, it serves only as a unique identifier for the inquiry as part of system functionality. PII, to include first name and last name, if an individual chooses to provide it, is within the inquiry record in Entellitrak unless the inquirer wishes to remain anonymous. The inquiry record is then assigned to an authorized Ombudsman's Office staff member to assist in trying to resolve the inquiry. If the inquirer has indicated that the Ombudsman's Office can share their PII with appropriate Bureau points of contact, the Ombudsman's Office may share their PII with the Bureau to assist in resolving the inquiry. After the initial review of inquiry information, an Ombudsman's Office staff member uses the available information in the Entellitrak record to assist in resolving the inquiry.

Inquirers often submit enough detail with their inquiry for the Ombudsman's Office to assist on an inquiry without following up with the inquirer for clarification. However, if needed, to contact the inquirer, the Office staff member references the name associated with the inquiry record in Entellitrak, if recorded, to search for the contact information in the original inquiry (email, mail, or via notes taken from a voicemail). The assigned staff member responds to the inquirer as needed and then closes the inquiry. Once the Office closes the inquiry, the assigned staff member may delete any PII associated with the Entellitrak inquiry record after 90 days in accordance with the Office's Records Schedule. The Office retains the summary of the inquiry within Entellitrak, without PII, for analytic purposes.

The Ombudsman's Office completes an annual report to the Bureau Director and a Mid-Year Update, as available on [www.consumerfinance.gov/ombudsman](http://www.consumerfinance.gov/ombudsman). The Ombudsman's Office uses information contained within the Entellitrak system to assist in resolving individual and systemic issues. The Office does not use PII to conduct these analyses nor does the Office publish PII in any of its reports.

The Ombudsman's Office also creates an outreach record within Entellitrak when the Office initiates a new outreach activity or engages in follow-up outreach with a wide array of external stakeholders, such as consumer, trade, and other groups and their memberships, financial entities, state and federal government agencies, and others. The outreach record includes the following PII: first and last name, title, organization's name, business email, and business telephone number.

Given the content and sensitivity of information collected and used by the Ombudsman's Office as described above, the Bureau required a solution that offered strict, transparent access controls to ensure confidentiality of the data. The Entellitrak application provides the robust, role-based security and access model to meet the Bureau's requirements, allowing the Ombudsman's Office to restrict access based upon role and responsibility.

## **2. Describe CFPB's objective for the information.**

The Ombudsman's Office collects the information to assist on inquiries submitted to the Office from consumers, financial entities, consumer or trade groups, or anyone else who has a process issue from interacting with the Bureau. The Office uses the data within the inquiry record in Entellitrak to assist in resolving the inquiry. The Ombudsman's Office uses information contained within the Entellitrak system to create reports without PII and identify larger systemic issues for review. The Ombudsman's Office also collects the information to conduct initial outreach and ongoing engagement with organizations external to the Bureau. The Office uses the data within the outreach record in Entellitrak to initiate engagement and follow-up on outreach 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.**

The Office may share PII within an Entellitrak record with internal or external stakeholders, who may assist with resolving the issue, if the inquirer indicates to the Office that PII can be shared. The Office also may have to share PII if there is a threat of imminent risk of serious harm, the inquirer raised an issue of government fraud, waste, or abuse, or if required by law. These activities are consistent with routine uses described within the Bureau's CFPB.010—Ombudsman System SORN. The Office does not share information collected for independent outreach with third parties. Additionally, that outreach information is typically publicly available.

## **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.**

The Ombudsman's Office does not require individuals to provide any PII; however, assistance with the resolution of an inquiry is very limited, and may not be possible, when PII is not provided. The Ombudsman's Office adheres to the ombudsman professional standards of practice of independence, impartiality, and confidentiality. Moreover, the Ombudsman Office's provides notice on its webpage that it has safeguards in place to preserve the confidentiality of the inquirer. When the Office receives an inquiry, it creates an inquiry record in Entellitrak that includes the inquirer's first and last name, if provided, along with a summary of the inquiry. If the inquirer wishes to remain anonymous, the Office creates a record in Entellitrak without the name of the inquirer, reflecting only a summary of the inquiry. The Office only shares the PII that is within Entellitrak if the inquirer indicates to the Office that it can be shared. The Office also may have to share PII if there is a threat of imminent risk of serious harm, the inquirer raised an issue of

government fraud, waste, or abuse, or if required by law. Individuals may request access to and amend their personal information in accordance with the CFPB.010—Ombudsman System SORN and the Bureau’s Privacy Act regulations, at 12 C.F.R. 1070.50 et seq. The Entellitrak system does not connect with any other internal or external system.

When conducting this PIA, the Privacy Office determined that a Privacy Act Statement must be provided on the Ombudsman’s Office webpage to provide notice to the public on the intended purpose and use of PII that is voluntarily submitted to the Office as part of an inquiry.

## 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.

The Bureau complies with the Privacy Act of 1974, Right to Financial Privacy Act, and E-Government Act of 2002; voluntarily adopts Office of Management and Budget privacy-related guidance as a best practice and applies NIST risk management processes for privacy. A full security review of the system was conducted by the Bureau based on all applicable federal laws, directives, and standards. The Bureau developed and followed a Security Implementation Plan (SIP) identifying the necessary procedures to use PII within the application. Additionally, the application is issued an Authority to Operate (ATO) prior to implementation.

The Bureau uses the following technical and administrative controls to secure the data and create accountability for the Bureau’s appropriate collection, use, disclosure, and retention of the information:

- Implementation of applicable NIST 800-53 control(s)
- Audit Logs and Reviews
- Bureau Personnel Privacy Training
- Bureau Privacy Breach Response and Recovery Plan
- Compliance with Bureau cybersecurity policy and procedures
- Data Quality and Integrity Checks
- Policy and Standard Operating Procedures
- Role-based Access Controls: The Ombudsman’s Office Entellitrak application is not accessible to the public. The following internal users have access to information collected and maintained by the application:
  - Ombudsman’s Office staff members: Each Ombudsman Office staff member has

access to the Entellitrak application to manage the status of inquiries. Each staff member assigned to assist with resolving an inquiry has access to the collected information, including any PII, to update the status of the inquiry workflow.

- IT System Administrators: IT system administrators, who are employees and contractors that directly support the Ombudsman's Office, are considered privileged users and as such have access to all data in the system, including PII associated with all records but not in a readable format, for the purposes of ensuring the systemic functionality of Entellitrak and other administrative application functions. Contractors acting in this role have reviewed and signed non-disclosure agreements (NDA) that describe the appropriate access and use of the system and the data it collects.
- Records Retention requirements: The Ombudsman's Office maintains records in accordance with the Office's National Archives and Records Administration (NARA) approved schedule. The records are covered by File Code #8000, RG 0587 Disposition Authority #N1-0587-2012-03.

As a result of the foregoing, the Ombudsman's Office can securely create, track, and manage inquiries electronically, reducing the privacy impact of manually managing inquiry details.

**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.)**

Only CFPB Ombudsman's Office staff and contractors acting on behalf of the CFPB Ombudsman's Office have access to the system. No other systems or individuals have access to the Ombudsman Office's data in Entellitrak.



# Document control

## Approval

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Date

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Wendy Kamenshine

CFPB Ombudsman

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