

RESCINDED

NOTICE TO READERS

Any attachments to this document are rescinded only as they relate to national banks and federal savings associations.

This CEO Memo addresses the financial privacy regulations that became effective on July 1, 2001, and it transmits to thrift CEOs a training and reference CD that OTS issued to its examination staff to assist them in implementing the new regulations.

Due to production costs, the CD referenced in the memo was made available to our regulated institutions only, but you can easily access the same material on the FFIEC Internet website <http://www.ffiec.gov/exam/infobase.htm>

We recommend that you visit that site if you are interested in the content of the CD.



Office of Thrift Supervision
 Department of the Treasury

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MEMORANDUM FOR: CHIEF EXECUTIVE OFFICERS

FROM: Richard M. Riccobono *Richard M. Riccobono*

SUBJECT: Financial Privacy Infobase CD-ROM

Accompanying this memo, you will find a copy of a CD-ROM titled "Financial Privacy Infobase." This CD contains a variety of both print material and audio-visual training segments on the Privacy of Consumer Financial Information ("the privacy rule"), section 305 of the Gramm-Leach-Bliley Act. In addition to the final privacy rule, the CD includes related reference materials for section 501(b) of the Gramm-Leach-Bliley Act dealing with information security and the Fair Credit Reporting Act. We had originally planned for this product to be used exclusively as an examiner training tool, but we believe that its comprehensiveness and streamlined design make it a good resource for institutions in their efforts to implement and maintain compliance with the privacy rule.

A partial list of the materials included on the CD is as follows:

- Gramm-Leach-Bliley Act: Summary of Provisions
- Gramm-Leach-Bliley Act § 501(b)
- The Fair Credit Reporting Act
- The Bank Holding Company Act, Section 4(k)
- Privacy of Consumer Financial Information: Final Rule
- Twelve Privacy Training Segments (PowerPoint slide presentation accompanied by audio narration)
- Examination Procedures, both interagency version and OTS-version containing supplemental material [**Note:** the examination procedures are also currently available through the OTS web-site as part of the electronic version of the Compliance Activities Handbook Section 375 at <http://www.ots.treas.gov/docs/48831.pdf>]

The CD has a great many more documents and features, and all are arranged for ease of access by various means (in chronological order, in alphabetical order, by regulating entity, et. al.). When the CD is used with an active Internet connection, there are a great many hypertext links that will redirect the user to the appropriate web site. [**Note:** Attached is a Fact Sheet that provides guidance on using the CD. Please note that the CD requires the Macromedia Flash

browser plug-in to review some of the material. Unless you have previously installed it on your computer, you should do so by connecting to the Internet and opening the Privacy CD. Click the Software Installers button on the first page and then click on Macromedia Flash Player to install the software.]

We hope that you will find the enclosed CD-ROM to be useful and authoritative. But the CD is just a starting reference point. As experience grows, best practices will develop. This is particularly true when it comes to preparing readily understandable privacy notices. Institutions should continue to evaluate their notices and benchmark against those prepared by others with the goal of communicating more effectively with consumers.

We would appreciate learning how you and your staff regard the CD's contents and usability in order to determine whether this is a delivery mechanism we wish to continue. Any feedback can be directed to your OTS regional compliance staff or to privacycheckup@ots.treas.gov.

Enclosures

Note: The contents of the CD are available on the FFIEC website at <http://www.ffiec.gov/exam/infobase.htm>



FFIEC Financial Privacy - InfoBase & Training CD - July 2001

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Fact Sheet

Overview:

As part of an interagency project to develop new methods of delivering interagency training, the FFIEC Examiner Education Office has created the FFIEC "InfoBase." The "InfoBase" provides a vehicle for the prompt delivery of educational, reference, and introductory training material on specific topics of interest to field examiners. The initial distribution is being made on the enclosed CD-ROM to accommodate examiners with limited Internet access. The enclosed CD-ROM represents a hybrid "browser-based" delivery method that may easily be transported to an updateable interagency web site in the near future.

Privacy Material Contents on this CD-ROM:

The CD contains a browser-based "web site" that provides the user with structured access to training and reference materials on Financial Privacy, as identified or developed by an FFIEC working group.

In addition to agency policy statements, examination procedures, and other reference documents, the CD contains 12 Flash-based presentations with audio. The time required to view all of these presentations is approximately 70 minutes. Individual segments may be viewed at different times. All materials are accessed from the main "control pad" or home page, named "Start.Htm."

Computer Requirements:

A Pentium 166MHZ PC with 64 Megs of RAM and multimedia capabilities is the minimum platform that has been successfully tested; however, many factors such as network connections and system settings may hamper performance. For this reason, the recommended minimum listed on the CD is 128 Megs of Ram.

Application Software Requirements:

The Privacy InfoBase CD has been tested on a variety of Windows operating systems including Windows 95, 98, ME, and 2000. A standard Web Browser, such as Internet Explorer (IE) 4.0 or Netscape 4.7 or above, is required. IE 5.5 is recommended. Two freely available standard "browser plug-ins" are also required. The Adobe Acrobat Reader plug-in, version 4.0 or higher is required for viewing reference documents and the Macromedia Flash plug-in, version 4.0 or higher, is required for the training presentations. An alternative to the Flash Plug-in that may be used to view the training presentations is also on the CD. This player option, Apple Quick Time Player version 5.0, may provide more stability on older machines. It also allows better end-user control with its enhanced "slider bar" presentation controller.

How to Start:

This CD will load and start automatically if the user computer's "autorun" feature has not been disabled. The InfoBase may also be started by using Internet Explorer (or Navigator) to open the file named "**Start.htm**" on the CD.

Many new PC's include the Internet Explorer web browser as well as the Flash and Acrobat plug-ins. However, links are provided on the CD under the "software installers" button on the control pad to enable individual users to update their machines when connected to the Internet. All of these plug-ins are available without charge from these sites. For individuals who do not desire to update their individual computers and who lack the Flash player, individual stand-alone versions of the training presentations are provided under the folder "Projector_files." These files are not accessible from within the InfoBase, and must be opened directly from the CD-ROM using Windows Explorer. These are self-contained executable "Flash movies" that do not alter the user's PC configuration in any way.

The FFIEC Examiner Education Office welcomes all comments, suggestions, and observations concerning this InfoBase. E-mail should be directed to FFIECInfoBase@fdic.gov.