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Date: October 4, 2018
Appraiser: Andreea Vlaicu, ACR1
Agency: Bureau of Consumer Financial Protection (BCFP)
Subject: DAA-0587-2018-0001

AKV
10/4/18

INTRODUCTION

Schedule Overview

BCFP Public Website (Site Content)

Additional Background Information

The process of posting information on the Bureau of Consumer Financial Protection (BCFP)'s website involves the program office whose information is being posted along with several other divisions and offices within the agency including the Legal Division, Office of the Executive Secretary, and the Office of Technology and Innovation. Prior to any website publication, the information must be pre-cleared by the Legal Division and senior stakeholders within the agency and all relevant feedback and corrections have to be addressed before final approval. Once the document is approved, a copy is submitted to the webmaster, for upload and publication. All website data is cloud-based and backed-up at the BCFP data centers. The recordkeeping copy is maintained by the program office.

Prior to submitting this proposed schedule to NARA, the agency conducted an underlying systematic analysis of the information published on each webpage of the website. This analysis included a mapping of the website and subsequent identification of all disposition authorities that apply to the original records whose copies are published.

Permanent records whose copies are published on the website will be transferred to NARA according to the transfer timelines indicated in their respective disposition authorities. The Home Mortgage Disclosure Act data, which has been previously maintained by the Board of Governors of the Federal Reserve System, was previously scheduled as permanent under N1-082-05-001. The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Bureau of Consumer Financial Protection

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(BCFP). Regulation C requires lending institutions to provide data on home purchase loans, home improvement loans, and home loan refinancings. BCFP has indicated that it is currently in the process of scheduling these records. NARA will continue to appraise these records as permanent.

Overall Recommendation

I recommend approval of the attached schedule.

APPRAISAL

Item 0001: Web Content

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate.

Appraisal Justification:

* The website does not contain unique information. Content on the website is duplicative of records maintained in other recordkeeping systems in the agency, appropriately scheduled, in the scheduling process, or covered by the General Records Schedules (GRS).

*Captured elsewhere in permanent records:

Significant rulemaking records (DAA-0587-2015-0002-0001);
Fair Landing Enforcement Files (DAA-0587-2014-0003-0007);
Significant Non-Rulemaking Policy and Official Research Publications Records (DAA-0587-2015-0002-0006);
Case Tracking System (DAA-0587-2017-0002-0001);
Administrative Hearing and Official Docket Files (DAA-0587-2017-0002-0002);
Consent Orders and Stipulations (DAA-0587-2017-0002-0004);
Final Reports, Studies and Recommendations (DAA-0587-2014-0006-0010);
Private Education Loan Ombudsman Annual Reports (DAA-0587-2014-0006-0021);
Audio Visual Files (DAA-0587-2014-0006-0007);
Historic publication files (DAA-0587-2014-0006-0001);
Historic event files (DAA-0587-2014-0006-0004);
Formal Regulatory Interpretations Records (DAA-0587-2015-0002-0004);
Press Conference Records (DAA-0587-2015-0001-0005);
Index of Master Copies of Press Releases (DAA-0587-2015-0001-0002)
Home Mortgage Disclosure Act Data (N1-082-05-001) *pending BCFP authority*
Periodic reports: Reports submitted to Congress, Office of Minority and Women Inclusion (N1-587-12-010)
Enforcement Actions: Historically significant cases/matters, completed projects, system data sets, and files exhibiting the criteria (N1-587-12-008 / 5.a.)

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability.

Media Neutrality: Approved.



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Appraiser